

IMPORTANT NOTE TO ALL MEMBERS AND RLI's

Following a lengthy debate during the LIASA general meeting held on 15th June 2007, the LIASA Executive was mandated to propose a definitive, legal and binding policy with regard to Comprehensive Reports (Annexure B Certificates).

A task team led by Mr. Willem du Toit forwarded me the draft proposal which was, thereafter, kindly edited by Dr. Theo Kleinhans. The draft proposal was subsequently perused by an Attorney specialising in OHS Act matters and an Advocate. The policy document, and references, was communicated and accepted at the LIASA general meeting held on 17th August 2007.

Since the terms of references are legally correct, LIASA has an expectation that all RLI's, and in particular LIASA members, will abide by the policy with effect from 25th August 2007.

The policy clearly differentiates between:

- a) The commissioning documents (Annexure A)
- b) The commissioning certificate (Annexure B)
- c) Who is responsible for completing each document.

New Installations and Modernisations:

It is clear that the installer has full control of the installation and further, the installation is manufactured and installed as per the code specified in the Annexure 1 document. Consequently, the RLI completing the Annexure B certificate has an obligation to ensure that items listed on the Annexure A are completed.

The Annexure B certificate for a new installation or modernisation should contain no items. The purpose of the Annexure B document is to verify compliance and is definitely not a means to highlight a non-compliance.

Existing Installations:

For various legitimate factors, a clean Annexure B issued for a periodic inspection, may be a near impossibility. Depending on the date of the original installation, only items that can be directly referenced with:

- a) The OHS Act as amended,
 - b) The C Regulations (if applicable),
 - c) SABS 1545 or 1543 as the case may be,
 - d) The latest SANS standards,
 - e) Other applicable standards published by the Dept. of Trade & Industry,
- are permissible for entry on the Annexure B document.

The following pages are the details of the LIASA policy with the appropriate references.

COMPREHENSIVE REPORTS

COMPREHENSIVE REPORTING HISTORY

- In the beginning we had the following test certificates:
 - ANNEX A for new and modified electric lifts,
 - ANNEX B for new and modified hydraulic lifts and
 - ANNEX C for the periodic inspections on both electric and hydraulic.
- Then the experts, who were representatives of all role players in the industry, decided to simplify the forms or make them more users friendly.
- This threw some of us out of our comfort zone and created two schools of thought. Those who served on the various committees and who knew what was going on and those others who still work on the old certificate specifications utilized by them since the early 1990's.

WHAT CHANGED AND WHY?

- The very first inspection documents were put together by the peer group of persons from the industry that did their best at the time, but as problems surfaced it became up to the SABS TC (Technical Committee) to improve on the documents.
- For this reason it was decided that we were not going to keep updating the original SABS 1545-1 and SABS 1545-2, but rather use the EN81 codes, which are now known to us as SANS 50081-1 and SANS 50081-2.
- The various test documents were then also removed from SABS1545-10 and placed in the relevant specification document namely SANS 1545-1 and SANS 1545-2. This was done to keep relevant documents together and to bring it in line with the Escalator Specification SANS 1543, which tests were always in the escalator Specification.
- The old ANNEX C as we all knew it changed to ANNEX B, because it was the second test in the document.
- The ANNEX A was then changed to the lift company's commissioning document just the way it was before 1May1994. This was done on request from the major lift installers. The argument was that all the tests, readings and measurements were done by the adjuster and field engineer during adjusting, why then do it again after commissioning.
- Because the new ANNEX A can now be signed by persons other than a Registered Lift Inspector, it is compulsory that an ANNEX B be issued before the unit can go into service.
- If the ANNEX A is now carried out by a Registered Lift Inspector, he must just complete the ANNEX B as well as the ANNEX A. It should not take him more than 5 minutes extra, because he has already carried out all the tests and measurements.

OCCUPATIONAL HEALTH AND SAFETY ACT

Some Lift Inspectors appear to refuse to change because they feel the changes are not in the OHS Act ... so let's look at the OHSAct for Lifts, Escalators and Passenger Conveyors :-

Section (2) of the law states that no person shall put a lift into use without a comprehensive report as contemplated in section (4):

- After a new installation is completed a new comprehensive report shall be obtained:
- Also after a modification,
- After a failure,
- After a change in the competent person (service provider) and
- Within 36 months thereafter (already reduced to 24 months by most major multi-lifted portfolio holders).

READ THE LAW CAREFULLY ... IT DOES NOT MENTION TWO DIFFERENT TYPES OF REPORTS. FIRSTLY YOU MUST HAVE A REPORT WHEN THE LIFT IS NEW AND THEN YOU MUST GET A NEW REPORT WITHIN 36 MONTHS.

Section (4) of the law states that the lift shall be inspected and tested in accordance with the SABS 1545-10 specification before the lift goes into service and at intervals not exceeding 36 months. Again the grammar indicates that there is only one type of report.

Also note that the law refers to specification 1545-10. No mention is made of any date or edition, because it is a *living document*, so we must use the latest edition.

FROM SANS 1545-10 ... The following amendments were made to SABS 1545-10:

- We originally started of with SABS 1545-10:1992 and we quote from Clause 3.1.1: ... “The performance of certain tests, as required to complete the appropriate test and examination certificate, shall be undertaken for every installation before it is put into normal service, i.e. at the time of commissioning. In addition, a thorough inspection of the entire equipment shall be undertaken at this stage, and the appropriate certificate shall be completed in all respects.” ... CLEARLY TWO CERTIFICATES.
- Part 10 was then amended to: SABS 1545-10:2000, edition 2. We all accepted the amendment and used it.
- Part 10 is now amended to: Replaced by SANS 1545-1 partially and SANS 1545-2 partially. *Why shall we not use it now?*

TO SUMMARISE within the current legislated lift regulations ...

- The OHSAct specifies the qualification for a lift inspector and it calls for the ANNEX B certificate, but not for an ANNEX A certificate as we know it today.
- SANS 1545-1 and SANS 1545-2 call for the ANNEX A and ANNEX B certificates as we know them, but does not specify the qualifications for a lift inspector.

WHAT CONCLUSION can we draw of what is applicable currently?

The ANNEX A document is the *commissioning document of the manufacturer* and can be signed by any qualified employee or contractor of the manufacturer, but it *must be accompanied* by an ANNEX B which is issued by a Registered Lift Inspector.

(Compiled by Buddie Ceroni & Willem du Toit, Edited by Dr. T. E. Kleinhans)