



Technical Warning Notice

Subject: Accessible Goods-Only Lifts (AGOLs) with no safety gear

Summary

We are aware of a number of incidents on Accessible Goods-Only Lifts (AGOLs) with lift cars not fitted with safety gear. Safety gears are almost universally fitted to lift cars which are suspended by ropes, chains, flat belts etc to prevent free-fall and uncontrolled movement when tripped by suitable actuation means.

AGOLs not fitted with protection against free-fall and uncontrolled movement pose an obvious danger to those who might enter the car for loading/unloading or those who might access the car or lift well as part of maintenance or thorough examination.

If any AGOL is encountered which does not have safety gear fitted, we strongly recommend the following:

1. **The owner should have a risk assessment carried out on the use of the lift including loading and unloading the lift car, access for inspection and maintenance.**
2. **The competent person carrying out thorough examination should report the lack of safety gear to the owner as an immediate defect.**
3. **The maintenance contractor should report where it is not possible to carry out work safely to the lift owner.**

This technical warning notice provides more recommendations and also provides our understanding of the conformity requirements for AGOLs in relation to prevention of free fall or uncontrolled movement.

Conformity requirements for AGOLs – prevention of free-fall and uncontrolled movement

AGOLs are specifically excluded from the scope of the Lifts Regulations and come under the Supply of Machinery (Safety) Regulations (SMSR).

Until the end of 1995, British Standards such as BS 2655-1, BS 5655-1 and BS 5655-2 would have applied to AGOLs and required safety gear to be fitted to rope or chain suspended lifts.

Since **1 January 1996**, all new AGOLs had to conform to the **Supply of Machinery (Safety) Regulations 1992** which enacted the 1992 EC Machinery Directive. The regulations set essential health and safety requirements (EHSRs) including 4.1.2.6 which required machinery such as lifts to be designed and constructed so that loads could not creep dangerously or fall freely and unexpectedly. The general principles required machinery to be designed to prevent *abnormal use* if such use would engender a risk.

From **29 December 2009**, the **Supply of Machinery (Safety) Regulations 2008** have applied enacting the latest Machinery Directive. The EHSRs of these regulations include the important refinement of the general principle to consider *reasonably foreseeable misuse*. Further requirements were included including EHSR 1.3.9 to address the risks of uncontrolled movements; EHSR 4.1.2.6 was similar to the earlier regulations, and EHSR 4.1.2.8.2 required that where persons have access to the carrier, the machinery must be designed and constructed in such a way as to ensure that the carrier remains stationary during access, in particular while it is being loaded or unloaded.

Demonstrating conformity to the EHSRs of SMSR was complicated by the lack of a harmonised standard. Following a harmonised standard gives a presumption of conformity to relevant EHSRs of the regulations. The alternative to following a harmonised standard is to base the design on a risk assessment which must address relevant EHSRs of the SMSR.

In 2010, a harmonised standard was published for AGOLs: BS EN 81-31:2010; *Accessible goods only lifts*. AGOLs following this standard have a presumption of conformity with EHSRs of SMSR/Machinery Directive. This standard requires rope and chain suspended lifts to be fitted with means to prevent free fall and uncontrolled movement.

Until 29 December 2009, it might have been arguable that SMSR 1992 did not require AGOLs with rope and chain suspension to have free fall protection on the basis that persons were prohibited from accessing the lift car.

From 30 December 2009, the new EHSRs and the publication of a harmonised standard to meet these should remove any argument about the need for prevention of free-fall and uncontrolled movement of AGOLs. Since then, any AGOL designed without safety gear would need to be based on a risk assessment showing how the EHSRs of SMSR are met.

AGOLs not fitted with prevention against free fall and uncontrolled movement.

Any AGOL with suspension and not fitted with prevention against free fall and uncontrolled movement poses obvious risks to the safety of those loading and unloading the lift car, those carrying out thorough examination or maintenance; whether accessing the lift car, the car roof or the lift pit. We strongly recommend the following in these cases:

1. **The owner should have a risk assessment carried out on the use of the lift including loading and unloading the lift car, access for inspection and maintenance.** The owner might need the assistance of their lift maintenance contractor. If access to the lift car cannot be prevented (e.g. lift car made not accessible as defined in BS EN 81-31) and inspection and maintenance cannot be done from outside the lift well, then the owner should put control measures in place until safety gear is fitted.
2. **The competent person carrying out thorough examination should report the lack of safety gear to the owner as an immediate defect.** Unless it can be carried out safely, the competent person should not carry out thorough examination. The owner should have suitable remedial work carried out to address the risks identified.
3. **The maintenance contractor should report where it is not practicable to carry out work safely to the lift owner.** The owner should have suitable control measures put in place until remedial work is carried out to address the risks identified.

Where the lift was originally designed without safety gears, it may be that the guidance design (guide rail type, size, guide brackets including structure and fixings) precludes the addition of safety gears. The addition of safety gear is considered to be an important modification of the lift requiring the design to be assessed for the higher loads to be imposed including suitable design calculations. Where the design is not suitable, it should be improved or changed for a new solution.