INFORMATION NOTE

Inspection and Test of Escalators and Moving Walks

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SNee Working Group

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Summary on inspection and test of escalators and moving walks

1. Introduction

ELA is committed to ensuring the safety of escalators and moving walks and therefore aims to also ensure that EU regulations help guarantee and enforce this commitment to safety. ELA therefore continues to closely monitor the status of the revision of the EU Machinery Directive and any possible overlap with the EU Lifts Directive and their overall impact on the European lifts, escalators and moving walks sector in Europe.

For these reasons, ELA’s SNEE Working Group has taken note of and held substantial discussions on the specific question of how the status of EU regulations may impact on the safety of escalators and moving walks.

In particular, it is the view of the WG that before we can fully understand the issue of safety and how the revision of the Machinery Directive may affect the safety of escalators and moving walks, ELA must first decide as an association what its approach to the safety of escalators and moving walks is.

The central question is:

- whether the current requirement for inspection and test before putting escalators and moving walks into service (and carried out by a competent person) must be extended to third party inspection and test;
- and also, if further inspection and test will have to be introduced and carried out by a competent person or a third party.

This issue is crucial in order to ensure that our sector guarantees safety over the entire lifetime of the product and that external stakeholders are fully aware and understand our sector’s commitment to safety.

2. Possible options for inspection and test

Chapter 7.3.1 of EN 115-1 requires that escalators and moving walks shall be inspected before their first use and under Chapter 7.4.1 that within the operating manual, information shall be provided about periodic inspection and test to ascertain whether the escalator or moving walk is safe during operation. In considering how best to comply with these requirements, the WG has discussed:

i. Whether inspection and test carried out by a third party should take place before putting the product into service, and
ii. Whether inspection and test should take place at regular and periodic intervals.

The WG has also addressed the definition of third party and examined who should carry out the inspection and test: should they be carried out by the industry itself (by competent persons) in a self-regulatory manner or by a third party?
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In discussing what the WG thinks the best approach to ensuring safety is, the premise was that the industry must at all times ensure consistent and effective inspection and test procedures.

The WG also acknowledged that escalators and moving walk across the EU vary in size and also have different levels of compliance with agreed safety standards across the entire lifetime of the product.

3. **SNEE WG proposal on inspection and test**

For the sake of better defining and agreeing the WG’s position in this regard, the WG has identified that the key actors who could potentially carry out inspection and test are: manufacturers, installers, third parties (such as inspection bodies or notified bodies).

A “third-party” is defined as a supplier (or service provider) who is not directly controlled by either the seller/Original Equipment Manufacturer (OEM) (first party) or the customer/buyer (second party) in a business. The third party is considered independent from the other two parties, even if it was hired by them. The third party is expected to be qualified to assure the quality of inspection and test.

Specifically, the WG’s views on inspection and test of escalators and moving walks are as follows:

i. Inspection and test must not necessarily be carried out by notified bodies.

ii. However, inspection and test are required before the Escalator or Moving Walk is put into service (in accordance with the Machinery Directive and EN 115-1); such inspection and test should at least be carried out by the Installer.

iii. Inspection and test also have to be carried out on a regular basis. In addition, inspection and test should be carried out by a third party at a maximum interval of two years.

iv. When a major modification is made to the escalator or moving walk, then a third party should again carry out an inspection and test.

v. In the case of an accident with a reported injury, a third party has to carry out the inspection and test. The OEM/installer/maintenance company should also have the possibility to carry out its own (additional) inspection and test.

Since escalators and moving walks have a very long-life time expectancy and can be in operation for several decades when they are maintained well, it is important that inspection and test are carried out periodically, preferably on an annual basis or at maximum intervals of two years rather than only after the escalators and moving walks have been placed on the market.