

By post and by email at eld-el-3@labour.gov.hk

26 November 2019

Engagement and Liaison Division
Occupational Safety and Health Branch
Labour Department
Room 1401, 14/F, Harbour Building, 38 Pier Road
Central, Hong Kong

[Attn: Mr LEUNG Ning, Occupational Safety Officer]

Dear Mr LEUNG

Revision of Code of Practice for Safety at Work (Lift and Escalator)

Thank you for inviting the Institution to provide views on the captioned subject. We are pleased to provide herewith our views and suggestions on the subject matters for your consideration.

Thank you for your attention.

Yours sincerely



Monica YUEN (Mrs)
Chief Executive & Secretary
The Hong Kong Institution of Engineers

Enc

MY/SW

Enclosure

**Views from the Hong Kong Institution of Engineers
on Revision of Code of Practice for Safety at Work (Lift and Escalator)**

The Hong Kong Institution of Engineers (HKIE) supports the revision of Code of Practice for Safety at Work (Lift and Escalator) to provide updated practical guidance for lift and escalator works.

2. The HKIE would like to provide the following suggestions and views with respect to various Sections of the draft document for the Administration's consideration:-

DRAFT REVISED CODE OF PRACTICE FOR SAFETY AT WORK (LIFT AND ESCALATOR)

Section	Suggestions/ Views
4.2.2 (a) and (b)	Suggest to define " <i>Competent Person</i> " by his/ her qualification/ experience to plan and carry out task-specific risk assessments
4.2.2 (c)	Suggest to define " <i>Sufficient</i> " by specifying the minimum number of workers, such as, a team with at least 2 people, as far as practicable, to enhance work safety in whatever circumstance
4.3.1 (a)	Suggest to emphasise workers' understanding of safety by including specific wordings, i.e. " <i>have understood the instructions and information on safety issues provided by their supervisors</i> "
5.1	<ul style="list-style-type: none"> Suggest to define the number of training hours relating to lift and escalator safety and be specific to unique safety design of different brand/ types of lifts and escalators being installed/ maintained by the Registered Lift and Escalator Companies (RC) in lieu of using general trade practices to install/ maintain all brands/ types of lifts and escalators Suggest to provide a booklet of safety rules for different brands/ types of lifts and Escalators maintained by the RC to Persons Employed so that they can follow and make reference to
6.1.2	Suggest that the record of periodic re-assessments should be maintained in the lift and escalator machine room for checking when necessary
6.3	Suggest to emphasise workers' knowledge of different brands/ types of lifts and escalators by including specific wordings, i.e. " <i>He should have full knowledge of relevant works of different brands/ types of lifts and escalators,...</i> "

7.1.2 (c)	Suggest to include regular checking, i.e. “... <u>metal scaffolds supported by fastenings (or anchors) to concrete or masonry should be checked by a professional engineer of the structural discipline or equivalent at a defined interval.</u> ”
7.1.4	Suggest to include the word “ <u>proper</u> ”, i.e. “... <u>and adequate/ proper safety nets...</u> ”
7.1.5	Suggest to emphasise the importance of proper training provided by suppliers of erecting and dismantling safety nets, i.e. “ <u>The work of erecting and dismantling safety nets should be carefully planned and supervised and only undertaken by competent personnel with proper training from suppliers.</u> ”
7.1.10	Suggest to emphasise the loading of safety net and include regular inspection, i.e. “ <u>A safety net corresponding to possible maximum falling load must be inspected at defined interval.</u> ”
7.2.4 (i)	Suggest to include “ <u>Safe Working Load should be posted on working platforms.</u> ” in the paragraph
7.3.1 (a)	Suggest to include “ <u>If the actual weight of the load to be handled is not known, the load and respective risks should be assessed by a safety supervisor or trained worker beforehand.</u> ” in the paragraph
7.3.2 (a)	Suggest to include further safety precaution in the paragraph, i.e. “... <u>in the direction he intends to move and ensure the route ahead is clear before move.</u> ”
7.5.2	Suggest to emphasise regular fire drill i.e. “ <u>Regular fire drill on site should be carried out.</u> ”
7.5.5	Suggest to define the condition of the fire extinguishers, i.e. “... <u>fire extinguishers should be available at suitable work locations and each of them are checked with effective expiry date.</u> ”
7.5.9	Suggest to emphasise the safety for specific material, i.e. “ <u>Incompatible work processes not with Material Safety Data Sheet should be strictly prohibited. Disposal of chemicals, flammable substances, oily rags, adhesives and solvents etc. should also be addressed.</u> ”
7.6.1 (a)	Suggest to include “ <u>Proper personal protective equipment including safety belt should be provided to workers before start of welding and cutting work in lift well or escalator truss.</u> ” in the paragraph
7.6.3 (e)	Suggest to include “ <u>Remove all dust around before carrying out the welding and cutting work inside lift well or escalator truss.</u> ” in the paragraph

7.7.1	Suggest to include “ <u>Ensure the each terminal of strings of rope wire to be bent inward the rope socket before pouring Babbitt.</u> ” in the paragraph
7.8.1	Suggest to include “ <u>Adequate lighting should be provided to workers when working inside lift well or escalator truss.</u> ” in the paragraph
7.8.3 (NEW)	Suggest to include an additional paragraph as follows: “ <u>Means to prevent falling at height should be provided in lift well. Accidental sliding of step chain of escalator after installation or during maintenance should be avoided and assured when working inside its truss.</u> ”
8.2.3 (a)	Suggest to include registered lift and escalator workers in working with live electrical equipment relating to life and escalator works, i.e. “ <u>work should only be carried out by registered electrical workers and registered lift and escalator workers or under supervision of a registered lift and escalator worker (registered under EMSD’s legislation);</u> ”
8.4.4 (d)	Suggest to include warning in an overload device, i.e. “ <u>An overload device with audible warning should be installed...</u> ” and to include “ <u>A Safe Working Load notice should be posted on guided suspended working platforms.</u> ” in the paragraph
8.4.4 (m)	Suggest to define the personnel involved, i.e. “ <u>The appliance should have regular inspection by a lift safety supervisor to ensure its safety. It should be tested and thoroughly examined by a Registered Professional Engineer [RPE] in Mechanical Engineering or Marine & Naval Architecture or Registered Lift Engineer.</u> ”
9.1.10	Suggest to define the person-in-charge, i.e. “ <u>Any items of equipment for dismantling should be lowered under strictly under control of a lift team lead...</u> ”
9.1.15 (ii)	Suggest to amend the paragraph as follows: “ <u>the temporary jumper can only be applied by trained and registered working personnel who are authorized by registered contractor registered lift or escalator worker.</u> ”
9.2.7	Suggest to include additional condition, i.e. “ <u>Special care should be taken where car tops are curved or domed or a common well shaft with two or more lift moving inside.</u> ”
9.2.8	Suggest to further define the condition, i.e. “ <u>All lift workers travelling on the car top with a lighting switched on should fully understand...</u> ”

9.7.5	Suggest to include specific working locations, i.e. “ <i>Work should not be carried out in severe weather conditions such as heavy rain and strong wind, <u>particularly for those who work in container terminals, etc.</u></i> ”
10.7	Suggest to include the condition that the driving motor of escalator should be stopped, i.e. “ <i>The landing plates of the driving and return stations, <u>when removed or displaced, the driving motor of escalator should be stopped...</u></i> ”
10.11	Suggest to include “ <i><u>When working inside the escalator truss / steps, besides electrical protection, a mechanical means to prevent the main step chain with steps accidentally sliding down must be considered to protect the worker safety.</u></i> ” in the paragraph
10.13	Suggest to include “ <i><u>When the escalator is tested to run, no one is allowed to ride or step on the escalator.</u></i> ” in the paragraph
12.1	Suggest to include “ <i><u>...in the risk assessment, which should include the hazards from fire, flooding, falling at height and falling objects etc.</u></i> ” in the paragraph
12.9.1	Suggest to include “ <i><u>A predetermined communication means shall be identified among workers before commencing replacement of hoisting ropes.</u></i> ” in the paragraph