

Schindler Elevator Ltd. Corporate R&D
Attn. P. Casteleyn
Codes & Standards Manager Europe
Bronstraat 15
1060 Brussels, Belgium

Date : July 26, 2013
Reference : 011-13-PC/PS
Treated by : P.J. Schaareman
Concerns : Application of regulated ventilation valve in Schindler 3300 lifts with EC type certificate number NL04-400-1002-004-27

Dear Mr. Casteleyn,

By e-mail dd. July 18, 2013 you have asked us several questions related to the application of a regulated ventilation valve "BlueKit" or similar device in combination with Schindler 3300 lifts. These lifts are certified by Liftinstituut, EC type-examination certificate number NL04-400-1002-004-27.

Main issues concerned with this kind of applications are related to the impact of the system on the safe use of the lift, the application of "not-lift-related equipment" in the well, the question if specific conformity assessment procedures are needed and, of course, if the solution provides suitable ventilation. Herewith you find our answers on your formulated questions.

Q1) *"Is the "BlueKit" or similar a "solution" **deviating** from the harmonised standard EN 81-1 clause 5.2.3 ?"*

[LI] No, we do not consider the application of "BlueKit" or similar device as a deviation of the Standard. The standard (clause 5.2.3) requires suitable ventilation. Additionally clause 5.8 is also seen as being fulfilled when the "BlueKit" or similar device is installed by the lift company and so considered to be part of the lift while maintenance is performed by or in charge of Schindler).

Q2) *"Is well ventilation required by an EHSR of the Lift directive?"*

[LI] No, there is no Annex I EHSR dealing with ventilation. The ventilation of the well can be done by a permanent opening, by a "BlueKit" or similar system and can be organised by the building owner prior to the installation of the lift (e.g. by the constructor) or at the same time of the lift installation by a subcontractor or even the lift installer.

Q3) *"Is a well ventilation device ("BlueKit" or similar) , as is the case for lift components, to be assessed with a view to prove compliance with the essential requirements of the LD ?"*

[LI] No, there is no specific EHSR to assess the solution. However it might be necessary to assess the suitability of the solution chosen.

(Note: National requirements might be available for ventilation of the well.)

Q4) "Is it compulsory that the installation of a "BlueKit" or similar device is subject (included) of a lift EC type-examination (annex V,B), EC design examination (annex XIII, 3.3) or unit verification (annex X) **if installed in the well** ? "

[LI] No, in our opinion the ventilation is no part of the lift installation itself for which a conformity assessment procedure is required. There are however certain design rules to be taken into account when applying a "BlueKit" system or similar device in the well. There are clear requirements that the "BlueKit" or similar device is not allowed to intrude in safety volumes and the general requirement what is to be considered as "suitable ventilation".

Maintenance and tests before use (fits for purpose) required for the "BlueKit" or similar system needs to be included in or added to the documentation of the lift. The same applies for the description of the interface of the lift to the "BlueKit" or similar device, the general technical product description and manufacturer declaration of conformity.

Q5) "Is it compulsory that the installation of a blue kit or similar is subject (included) of a lift EC type-examination (annex V,B) or EC design examination (annex XIII, 3.3) or unit verification (annex X) **if installed outside the well** ? "

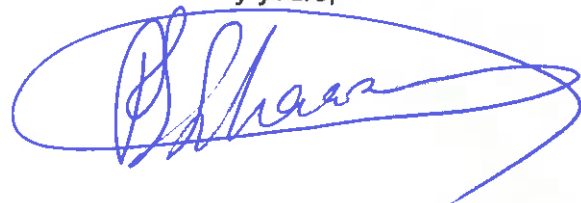
[LI] No , see Q4

Q6)" Is it compulsory that the installation of a blue kit or similar **in the well** is subject (included) of a lift EC type-examination (annex V,B) or EC design examination (annex XIII; 3.3) or unit verification (annex X) if months, years, later installed in the existing well in which a CE- lift already in use?"

[LI] NO, modification of an existing lift is in any case subject of National regulations. Basically similar motivation as Q4 applies.

We trust to have informed you properly. If you have any questions, please let us know.

Sincerely yours,



P.J. Schaareman
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