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The professional voice of the
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Response to the BS EN 81-76 – Safety Rules
for the construction and installation of lifts –
Particular applications for passengers and
goods passenger lifts – Part 76: Evacuation
of persons with disabilities using lifts

18th December 2019

To MHE/4 British Standards Institution,

prEN 81-76 – Safety Rules for the construction and installation of lifts – Particular applications for passengers and goods passenger lifts – Part 76: Evacuation of persons with disabilities using lifts Draft for Public Consultation

Please find attached the National Fire Chiefs Council (NFCC) response to the Drafts for Public Consultation for *prEN 81-76 – Safety Rules for the construction and installation of lifts – Particular applications for passengers and goods passenger lifts – Part 76: Evacuation of persons with disabilities using lifts Draft for Public Consultation*.

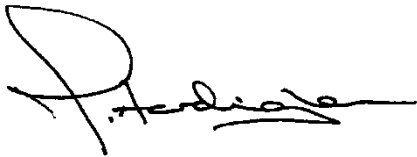
The NFCC is the professional voice of the UK fire and rescue services and is comprised of a council of UK Chief Fire Officers. This submission was put together through the NFCC's Protection and Business Safety Committee, which I Chair. The Committee is comprised of protection and fire safety specialists from across the UK.

The NFCC supports the standardisation of an approach to the specification for the construction and installation of lifts to be used for the evacuation of persons with disabilities. The use of lifts can form an intrinsic part of a safety management plan, particularly where it would prove to be impractical to evacuate a building by other means. The recommendations from the Grenfell Tower Inquiry Phase One Report emphasise the need for managers of buildings to formulate evacuation plans for people with disabilities. The use of evacuation lifts for this purpose will be key to ensuring a practical, safe solution for high-rise residential buildings.

NFCC is, however, concerned that this guidance is not viewed in isolation. Recommendations in the EN relating to automatic and remote evacuations using lifts have no references in current guidance in the UK. Following the publication of this standard, NFCC would call for a review of Annex G of BS 9999, which is the current main piece of guidance on the design and use of evacuation lifts. NFCC is concerned that, without additional information with regard to safety management and the risk assessment of the

suitability of the use of automatic and remote evacuation lifts, they could be installed in premises without adequate consideration and risk assessment of the control measures that may be required. An automatic or remotely controlled evacuation lift should not be seen as an adequate compensation for a lack of on-site management to assist where needed. Whilst some of these considerations are outlined in the normative Annexes A and B, NFCC would like to see that this information be incorporated into the main guidance for building design and management in order to reach a wider audience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Hardingham', with a stylized flourish at the end.

Mark Hardingham

NFCC Protection and Business Safety Committee Chair

Template for comments observations

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| Date: 20/12/19 | Document: BS EN 81-76 |
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| Organization | Line number (e.g. 17) | Clause/Subclause (e.g. 3.1) | Paragraph/Figure/Table/ (e.g. Table 1) | Type of comment ² | Comments | Proposed change | Accepted/Rejected (with rationale) <i>BSI use only</i> |
|--------------|--------------------------|--------------------------------|---|------------------------------|--|---|---|
| NFCC | | 5.4 | | ge | <p>NFCC is concerned that this guidance is not viewed in isolation.</p> <p>Recommendations in the EN relating to automatic and remote evacuations using lifts have no references in current guidance in the UK . Following the publication of this standard, NFCC would call for a review of Annex G of BS 9999, which is the current main piece of guidance on the design and use of evacuation lifts. NFCC is concerned that, without additional information with regard to safety management and the risk assessment of the suitability of the use of automatic and remote evacuation lifts, they could be installed in premises without adequate consideration and risk assessment of the control measures that may be required. An automatic or remotely controlled evacuation lift should not be seen as an adequate compensation for a lack of on-site management to assist where needed. Whilst some of these considerations are outlined in the normative Annexes A and B, NFCC would like to see that this</p> | <p>Draft a UK specific annex outlining requirements that should be considered in order to adopt remote and automatic left evacuations.</p> <p>Also, inform FSH14 of the need to review the evacuation lift guidance which forms part of Annex G of BS9999</p> | |

MB = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

1 Type of comment: **ge** = general **te** = technical **ed** = editorial page 1 of 2

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Template for comments observations

Date: 20/12/19

Document: BS EN 81-76

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