

# Elevating Device Program

➤ Program Overview Manual



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# Elevating Device Program

## Introduction

As of 2005, British Columbia had the third largest concentration of elevators in Canada. In fact, it would be difficult to find a recently built structure that does not have an elevating device of some sort. The Elevating Device Program is a safety program responsible for the safe design, installation, operation, maintenance, repair, inspection, alteration, and manufacture of elevating devices in British Columbia. In addition, the program monitors the activities of licenced elevating device contractors, adopts codes,



releases documents about safety issues, and attends to issues that may not be covered by the codes but require attention. Generally, the program ensures the safety of people, products, and work practices regarding all elevating devices by enforcing the *Safety Standards Act*, the *Safety Standards General Regulation*, and the *Elevating Devices Safety Regulation*.

Elevating devices come in several forms. These include elevators, escalators, personnel lifts, lifts designed for persons with physical disabilities, moving walkways, dumbwaiters, and dumbwaiters with automatic transfer devices. Elevating devices also include material lifts, rotating platforms, personnel hoists, and revolving platforms, such as the one found in the Harbour Centre in downtown

Vancouver. The program regulates any elevating device that travels 2 feet to 52 floors and that travels 30 feet per minute to 1,000 feet per minute.

Under the *Safety Standards Act*, an elevating device is defined as any apparatus, mechanism, or device that is installed or positioned with the intent of raising, lowering, moving, carrying, conveying or directing people, materials, or goods. To be more specific, elevators can be either hydraulic, rack and pinion, roped hydraulic, or traction. A rotating platform is a special elevating device that has a turntable that transports passengers in a circular direction around a given axis. Another type of an elevating device is a personnel hoist. This is used to raise or lower people, materials, or both during the construction, the alteration, or the demolition of a building. Often, the hoist is not a permanent part of the building and is taken down when the building project has been completed.

The Elevating Device Program regulates all elevating devices in British Columbia with the exception of single home dwellings and any federal jurisdiction. Almost every area in the province falls under the jurisdiction of the program. The City of Vancouver, however, has its own charter codes, which are often more stringent than those of the *British Columbia Building Code*.

To ensure safety in British Columbia, the Elevating Device Program applies consistent standards to regulated work and products. It is important that all regulated work and products meet code and regulation requirements. The program also registers designs for elevating devices, issues operating permits, conducts acceptance inspections, and investigates incidents. Any decisions made by a Safety Officer can be reviewed by a Safety Manager. If the client is not satisfied with the review, the client has the right to appeal the decision to the Safety Standards Appeal Board, which is independent of the BC Safety Authority.

Technology in the elevating devices industry has come a long way over the last century. Gone are the days when means of suspension, such as rope fibres, were used to support elevators. Today, those ropes have been replaced by multiple-steel ropes. Factory inspectors used to regulate elevating devices under the *Factories Act*; however, eventually it became necessary to have specialized inspectors from the elevator industry check elevating devices.

The first edition of the *CSA B44 Safety Code for Elevators* was published in 1938 to meet a uniformed legislation throughout the various provinces. This was done to replace inadequate legislation or elevator practices. Separate codes existed for the United States and for Canada until 2000, when the two were harmonized into one code for all of North America (with a few deviations from the Canadian code). The 2004 edition of the code contains fewer differences than the original versions.

Today, the Elevating Device Program follows the codes as outlined in the *ASME A17.1, Safety Code for Elevators and Escalators*, and *CAN/CSA B44, Safety Code for Elevators*. The *ASME A17.1/CSA B44 Code* is the North American standard for the design, construction, installation, operation, inspection, testing, maintenance, alteration, and repair of elevating devices.

The National Association of Elevator Safety Authorities (NAESA) qualifies the Elevating Safety Officers to inspect and regulate all elevating devices in British Columbia. In turn, the American Society of Mechanical Engineers accredits the NAESA Qualified Elevator Inspector Program. Safety Officers are required to write the inspectors examination annually. Accordingly, the Elevating Device Program ensures the Qualified Elevator Inspector requirements are met. The program verifies that the Safety Officer has completed the specific courses and attended seminars and industry workshops before writing the annual exam. This is how the program ensures its personnel are qualified to conduct the inspections and enforce the codes and regulations.

As the economy and population of British Columbia continue to grow, the Elevating Device Program may need to evaluate its operating capacity in order to meet the needs of the people of the province, enhance its enforcement of the codes and regulations, and further develop and implement its programs to continue its delivery of safety services.

## Services

Almost 21,000 elevating devices are registered with the BC Safety Authority. The Elevating Device Program delivers its services to ensure the safety of people, products, and work practices relating to elevating devices in British Columbia. The program provides the following services:

- Conducts inspections;
- Issues contractor's licences, operating permits, and certificates of inspection;
- Checks that elevator mechanics and constructors are qualified;
- Grants variances to the codes or regulations when the proposed alternative method meets or exceeds the safety objectives;
- Investigates incidents;
- Registers design submissions;
- Provides technical expertise; and
- Informs the public and stakeholders regarding safety issues.

Roles and responsibilities of the Safety Manager and Safety Officers focus on administering the *Safety Standards Act* and the *Elevating Devices Safety Regulation*. These are their guides to ensure that all clients that have elevating devices comply with the codes and regulation requirements.

The BC Safety Authority appoints the provincial Safety Manager, who has the power to do the following: issue permits; register design submissions; grant variances; issue directives, information bulletins, safety orders, and safety advisories; and issue, suspend, or revoke a contractor's licence. The Safety Manager also provides technical advice and support to Safety Officers, recommends changes to the *Safety Standards Act* and the regulations, provides advice on risk management systems, and undertakes incident investigations, which includes analyzing the root causes and statistics of incidents.

In addition, the Safety Manager represents the BC Safety Authority at appeal hearings, issues discipline orders and monetary penalties, and reviews any disputed decision made by a Safety Officer. The Safety Manager may also request clients who hold a contractor's licence, certificate, permit, or any other permission under the *Safety Standards Act* to take an examination to prove their qualifications in order to maintain their status. As a representative of the BC Safety Authority, the Safety Manager also



acts as a liaison to standardize and harmonize codes and standards across jurisdictions. This is done by participating in committees and submitting ballots with national and international standards development organizations and certification agencies.

Safety Officers are at the forefront when dealing with clients and provide the following services: issue permits; conduct inspections; answer inquiries; grant variances; investigate incidents; check that workers are qualified to perform the regulated work; review requests for variances and provide recommendations to the Safety Manager; issue, suspend, or revoke permits; and issue compliance orders.

Overall, Safety Officers monitor the elevating devices industry and witness acceptance inspections to ensure that all elevating devices comply with the codes and regulations before they are put into service. New elevating devices are inspected at the time of their installation. When an elevating device has passed an acceptance inspection, the Safety Officer issues a Certificate of Inspection which permits the client to operate the unit.

## **Licences**

One of the services the Elevating Device Program provides is the issuance of contractor's licences. Each class of licence has certain restrictions regarding what regulated work the contractor can perform. Class A licence has the widest scope and allows the licenced contractor to manufacture and install any type of elevating device.

Regardless of the class of licence, the applicant goes through an audit process with the Safety Manager, which consists of an interview and a review of qualifications and experience. The Safety Manager reviews the applicant's business plan, which should include an inventory of parts for elevating devices. It should also include resumes outlining the education and experience of each of the applicant's staff. When everything is in order, the Safety Manager issues an elevating device contractor's licence, which allows the contractor to perform regulated work under the *Safety Standards Act* and regulations.

An applicant that wishes to obtain or renew a contractor's licence must list all the elevating units that are to be maintained and how frequently each unit is to be maintained under a *mandatory maintenance program*. A mandatory maintenance program means the licenced contractor has a service contract with an owner to maintain and examine the elevating device periodically and repair or replace any defective equipment or components as per the *Safety Standards Act* and regulations, and applicable codes. Services should include cleaning, lubricating, making adjustments, conducting safety-related tests, and correcting any deficiencies. This contract does not, however, include making any alterations as specified by the Safety Manager or as defined by the codes.

The BC Safety Authority sends out notices annually to remind contractors to renew their licences. However, annual renewal notices are not sent out for licences for a construction hoist operator or a temporary license to operate an elevating device. Therefore, it is up to these contractors to renew their licenses before the expiry dates.

<b>Classes of Contractor's Licences Issued by the Elevating Devices Program</b>	
<b>Class</b>	<b>Scope of Licence</b>
Class A	Designing, constructing, installing, altering, repairing, maintaining or testing any elevating devices except passenger ropeways or amusement rides.
Class RA	Installing, altering, repairing, maintaining or testing elevating devices, other than passenger ropeways or amusement rides, that are indicated on the licence.
Class M	Maintaining and repairing elevating devices, other than passenger ropeways or amusement rides, that are indicated on the licence.
Class C	Designing, constructing, installing, altering, repairing, maintaining or testing personnel hoists.
Class H	Designing, constructing, installing, altering, repairing, maintaining or testing elevating devices for individuals with physical disabilities.
Class IC	Installing non-structural elevator cab enclosure linings.
Class MR	Maintaining and repairing elevating devices indicated on the licence.

Each class of licence has restrictions on what type of regulated work a contractor can perform.

## ***Certifications***

The Elevating Device Program does not issue Certificates of Qualification nor qualify tradespeople, but does ensure that clients in British Columbia are using qualified regulated workers. Licenced elevating device contractors are to only employ qualified workers to perform the regulated work. The majority of elevator constructors and mechanics receive qualification from the Canadian Elevator Industry Educational Program. This, however, only applies to signatory elevator companies, which are signatory to the International Union of Elevator Constructors. This is a quasi-apprenticeship program that provides a combination of training courses and apprenticeship work. Usually, a company that specializes in elevator construction and maintenance arranges the work experience for the apprentice. After a six month probationary period, the apprentice becomes eligible to take the courses offered by the International Union of Elevator Constructors. Once the apprentice completes this apprenticeship program, the apprentice may apply to write the Certificate of Qualification (TQ) exam in order to receive a certificate that is recognized at a national level. Alternative mechanic certification programs are offered from Durham College, in Toronto, Ontario.

## ***Design Submission Registrations***

The Elevating Device Program registers design submissions but does not provide approvals for them. Every year, the program registers nearly 850 new design submissions. Approvals, however, are done by professional engineers that have Class A licences, who certify that the contents are in compliance with the safety codes. Any contractor with a restricted Class A licence and all other classes of contractor's licences may hire a professional engineer to ensure that all the contents in the technical information package is complete and accurate before sending it to the Safety Manager for registration.

Clients need to register design submissions for all new installations or alterations to existing elevating devices. All the necessary and approved information should be contained in a technical information package. Before this package reaches the Safety Manager, a professional engineer needs to do three things:

- Approve the manufacturer's specifications for constructing and installing the new elevating device;
- Approve the design drawings and specifications for altering an existing elevating device; and
- Verify the accuracy of the information contained in the package.

All information in the package must comply with the *Safety Standards Act*, the *Safety Standards General Regulation*, and the *Elevating Devices Safety Regulation*, and any applicable codes, such as the *CSA B44 Elevator Safety Code*. When all the contents are in order, the professional engineer stamps the drawings with an Engineer Seal and provides a date and signature on the seal of approval. The client submits the package to the Safety Manager who registers the documents before an acceptance inspection by a Safety Officer occurs.

## ***Permits***

A Safety Officer inspects the elevating device at the time of installation and issues a Certificate of Inspection. Any non-compliance noted on the certificate needs to be corrected by the client. Non-compliance is any work or equipment that fails to meet code and regulation requirements. After a year, the client takes out an operating permit for the elevating device and renews the permit annually. A condition for a renewal is that the owner must name on the permit the registered contractor who will be maintaining the elevating device.



## ***Inspections***

The Elevating Device Program often issues over 2,500 Certificates of Inspection in a given year. Safety Officers conduct acceptance inspections and billable inspections. An acceptance inspection is conducted when the elevating device has been installed, modified, or has undergone major alterations and is ready to be put into service. Under this type of inspection, the Safety Officer determines that the unit complies with the requirements of all applicable codes, regulations, and standards. Billable inspections are for when a client requests an inspection or when the inspection requires more time than what was initially scheduled.

Inspecting an elevating device is an involved process. Inspection times for elevating devices may vary. For example, an elevator in a building with 21 floors may take the Safety Officer two days to inspect; whereas, inspecting a lift for people with disabilities require a couple of hours. The Safety Officer works from a Data Sheet (which is like a checklist) to inspect all the necessary parts on the elevating device. During the inspection, the Safety Officer checks the amperage, voltage, and hydraulic pressure and ensures that all the electrical circuits are working properly. The speed of the unit and all of its clearances are also measured. After the inspection, the Safety Officer completes a Certificate of Inspection and notes any non-compliance on it, which the contractor must correct within a certain timeframe. The Safety Officer then does a follow up on the correction of the non-compliance.



When the unit passes the acceptance inspection, the Safety Officer issues a metal identification plate. For passenger type elevators, the client must display the plate somewhere visible inside the car. For all other elevating devices, the client must display the plate in a visible spot somewhere that is adjacent to the unit. Wherever the client places the plate, the Safety Officer should be able to have access to it.

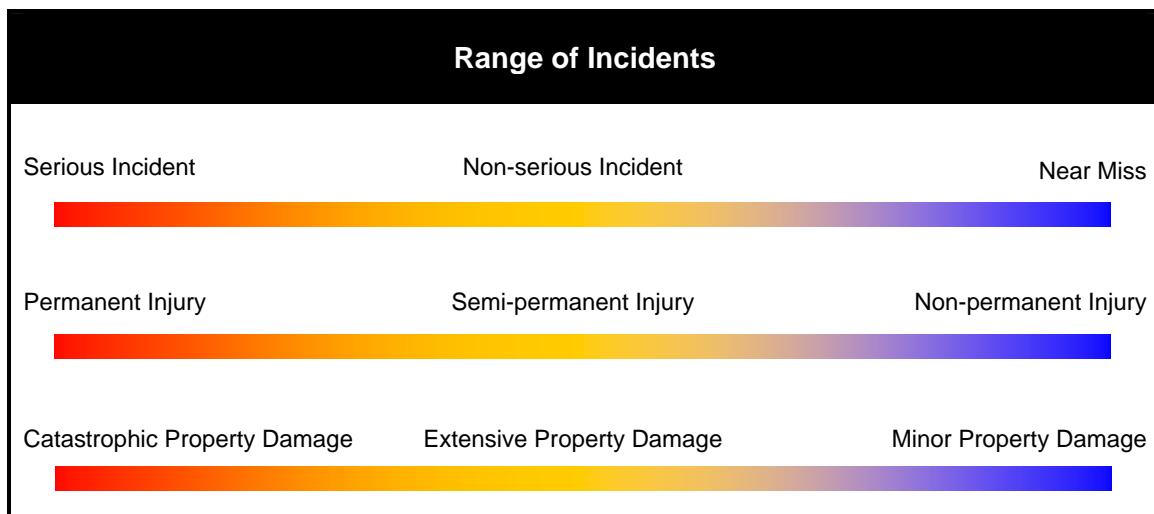
Safety Officers provide risk-based assessments on units that are already in service. In an extreme case, an elevating device may be taken out of service. If an elevator needs to be shut down, the Safety Officer removes the electrical fuses, seals the switches in an open position, ensures all power circuits are opened, and places a sticker to indicate the unit can not be used. Essentially, the Safety Officer physically removes the elevator from service to ensure safety.

## Investigating Incidents

A Safety Officer may also conduct an incident inspection on an elevating device if there are complaints about its operation or if the unit is a suspected safety hazard. Unless otherwise specified by the Safety Manager, the client must shut down the elevating device immediately if it was involved in an incident. As well, the client may not repair it or return it to service without the Safety Officer's permission.

The severity of an incident may require the services of many groups during the investigation. A Safety Officer, the licenced elevating device contractor, the client, the police, a WorkSafeBC Officer, and a coroner may need to be involved. The Safety Officer's role is to gather all the facts in order to determine the cause of the incident. This may mean interviewing witnesses and experts or obtaining the necessary data about specific parts from the manufacturer. The Safety Officer then prepares a detailed report, which the Regional Business Manager reviews before sending it to the Safety Manager.

Passengers slipping, tripping, or riding the escalator in an unsafe manner are the majority of elevating device incidents. Another leading cause stems from objects falling down escalators because of mishandling. Such objects are carts, strollers, and bikes, which are not permitted to be used on escalators.



Incidents involve personal injury or damage to property and range from serious to minor.

Human error is the main cause of incidents; however, the BC Safety Authority believes that new technology in elevating devices should reduce incidents significantly over the long term. Elevating devices are safer now than they were in the 1970s. Each year, the codes and standards are amended to cover more safety features in order to provide a safer ride for passengers. Such features include better detection devices at the door entrances of elevators, car levelling accuracy at all floor levels, and improved circuitry

in elevating devices. The program learns from investigating incidents and can apply the results to the codes in order to prevent similar incidents from happening again.

### ***Technical Expertise***

With the increasing advancements in the elevating device industry, it is important for the Safety Manager and Safety Officers to upgrade and stay current on rapid changing technology. Their technical expertise becomes vital to the Elevating Device Program as clients and stakeholders rely on their experience. Safety Officers also provide technical expertise to legal counsel regarding information on the operation of elevating devices. In some cases, the Safety Officer may be asked to attend hearings and coroner inquests. Safety Officers are also helpful in assessing the need for changes in the codes, standards, and regulations.

Technology in elevating devices continues to progress and newer products may not be covered in the present codes and regulations. An example of this is the European concept of a machine-roomless elevator. These were introduced to British Columbia in 2003 and are now being installed throughout Canada and United States. Most conventional geared or gearless elevators have a large machine room that sits on the roof of the building. This new technology, however, uses a smaller sheave that can be mounted within the hoist way of the elevator. The Safety Manager can review such new technology and recommend legislation, policy, and regulation amendments concerning safety systems.

The Safety Manager continues to review the program's inspection standards and procedures so as to evaluate other existing safety programs in the elevating device industry. In addition, the Safety Manager studies the trends in compliance of owners, contractors, and tradespeople with regards to regulated work and products. Furthermore, the Safety Manager composes papers on issues regarding technology changes and on findings from incident investigations.

### ***Variances***

The Elevating Device Program issues variances frequently: Often 60 a year. Under the *Safety Standards Act*, a variance is a formal document that allows a client to deviate from the codes and regulations for a one-time circumstance without compromising safety. For example, a client may request a variance for a building that is not designed to allow the licenced elevating device contractor to install an elevator according to the codes. This would pose a problem for the contractor, who would need to consider an alternative other than making some structural changes to the building. The contractor would then approach the Safety Manager for a variance to the codes, which would only be granted if the contractor can guarantee or exceed an equivalent level of safety.

## ***Equivalent Standards Agreements***

An Equivalent Standards Agreement is a written agreement between the client and the Safety Manager and is an innovative way for the Elevating Device Program to develop a working partnership to ensure safety. This agreement allows the client operational flexibility on performing regulated work or using a regulated product in a different manner than is prescribed by the codes and regulations. Before an agreement can be reached, the Safety Manager must be satisfied the alternative approach to the work or use of the product is consistent with objectives of the regulations and does not increase or create additional risk of injury or damage to property. The Safety Manager may also terminate the agreement at any time.

It is probable that the Safety Manager of the Elevating Device Program will enter into Equivalent Standards Agreements with some of the larger industrial sites, such as pulp mills and stations that generate resources. Organizations such as these would have the resources for maintaining and conducting periodic inspections of their own elevating devices and equipment. However, this program will likely enter into most agreements with clients in combination with other technologies, such as the Electrical Program.

## ***Accessibility and Communications***

With regards to safety, communicating information and access to BC Safety Authority employees is critical. Clients may obtain many of the documents and forms at any BC Safety Authority office or access them through the website.

The program also informs the public, clients, and stakeholders on safety issues, potentially hazardous products, and regulatory amendments by issuing safety advisories, directives, information bulletins, and safety orders.

The Safety Manager can issue any of four types of documents. Safety advisories are non-binding and non-statutory and inform or remind the public of existing potential hazardous products or unsafe practices. The Safety Manager issues a directive to clarify the interpretation of the codes and regulations, to provide directions on the application of a regulation, or to exercise the powers granted under the *Safety Standards Act*, regulations, or code. Information bulletins are non-binding and non-statutory and are issued to provide general information to staff, stakeholders, and the public. Finally, safety orders are binding and are issued to prevent, avoid, or reduce the risk of personal injury or damage to property. A safety order can be processed within a few days and is sent out to reach as many affected clients as practicably possible.

## ***Other Services***

Safety Officers foster public safety awareness. They also educate the public and the elevating device industry on the changing technology, codes, and standards. This involves developing and delivering training seminars and briefings.

The BC Safety Authority is represented on the Board of Directors with the Elevator Escalator Safety Foundation of Canada, which puts on a Safe-T Rider program to educate children and to help promote escalator safety. Teaching children about safety issues is a fast and effective way of getting the message across to others, such as their parents and the elderly.

When people are not careful, they can be susceptible to tripping, falling, and getting personal apparel or footwear trapped on escalators. Children tend to step on the sides of the step-treads of the escalators and drag their feet against the side panels. The friction creates enough heat to entrap the soles of their running shoes. The elderly that use walkers are also prone to accidents on escalators. A simple misstep would be enough for an injury to occur. As well, people who carry items, such as strollers, bicycles, and shopping carts, increase their chances of getting into an accident. The program educates the public on these safety issues.



On occasion, a local fire department may ask a Safety Officer to conduct tests on smoke sensors and fire alarm systems in elevators to ensure they respond the way they are supposed to. This is a service provided by the BC Safety Authority to ensure safety.

## **Resources**

The Safety Manager of the Elevating Device Program is a major resource for providing technical expertise to Safety Officers and industry stakeholders. Several years of work experience and competent technical knowledge along with interpersonal communication skills are important assets for the Safety Manager to have.

Becoming a Safety Officer requires a minimum of five years related experience as an elevator mechanic and knowledge of maintaining and safely operating elevating devices. Preference is given to those having a two-year diploma from a recognized institute of technology. In addition, a Safety Officer needs a passing mark of 70 percent

on the Elevating Safety Officer Certificate of Qualification Examination within the first six months of employment at the BC Safety Authority. After a year of employment, the Safety Officer must pass an exam administered by the National Association of Elevator Safety Authorities, who accredits the Safety Officer as a Qualified Elevator Inspector. The Safety Officer, however, must write an exam annually in order to retain membership. Since the codes are continually changing because of technical



advancements, Safety Officers are encouraged to upgrade their knowledge and may attend seminars or take courses. As well, the BC Safety Authority provides additional training and resources for Safety Officers to conduct inspections and enforce the codes and regulations.

Clients may ask a Safety Officer about the codes and regulations. Safety Officers should have full knowledge of the *Safety Standards Act*, the *Safety Standards General Regulation*, and the *Elevating Devices Safety Regulation*. They also need to have knowledge of the *Canadian Electrical Code Section 38* as there is some overlapping of electrical components in elevating devices. To further guide the Safety Officers, the BC Safety Authority provides additional training and continues to update and develop *Standard Operating Policies and Procedures* for them to follow.

Inspections ensure the safety of people, products, and work practices and ensure that clients are complying with the codes and regulations. Safety Officers conduct visual inspections of elevating devices and use such tools as required to perform tests. These may include a Vernier caliper, door torque gauge, tachometer, rope, tape measure, flashlight, and sheave.

The BC Safety Authority uses POSSE – software adopted in 2003 – to manage all the client accounts and inspection reports. After completing an inspection, the Safety Officer records the data into POSSE or on a laptop computer into RANGER, which is an extension of POSSE. The Safety Officer can print out a Certificate of Inspection on a portable printer while still on the client's site.

## Clients and Stakeholders

The Elevating Device Program has over 18,000 different clients in British Columbia, some of which, such as BC Ferries, have a *Fee for Service* contract with the program. To better serve the province in the delivery of safety services, the program maintains an open dialogue and communication with its clients, as well as its stakeholders. Taking these groups into consideration, the program continues to focus on the areas of most concern regarding safety. One such area where the program tends to focus its attention is on people who ride escalators.

The program works with several groups to ensure the safety of people, products, and work practices regarding elevating devices. An extension of the program is the technology committee, which is made up of industry representatives, contractors, representatives from technical schools, and other interested stakeholders. The agendas of the committee members are to review new standards, identify safety issues, recommend changes to regulations, and evaluate the delivery of safety services. They also help the program to develop policy and to propose regulatory changes.

Some of the groups that the program relates to are as follows:

- National Association of Elevator Safety Authorities (NAESA)
- American Society of Mechanical Engineers (ASME)
- Building Owners and Managers Association (BOMA)
- International Union of Elevator Contractors (IUEC)
- Canadian Standards Association (CSA)
- British Columbia Construction Association (BCCA)
- Council of Construction Associations (COCA)
- Elevator Escalator Safety Foundation of Canada (EEFSC)
- Canadian Electrical Contractors Association (CECA)

Stakeholders rely on the Elevating Device Program to provide consistent delivery of safety services and to participate at industry conferences. Although the list of stakeholders in British Columbia is extensive with the intent of maintaining public safety, the following list outlines some of the areas where program is involved:

- Elevating device manufacturers
- Educational institutions
- Fire and Rescue
- Heavy Industry (e.g., pulp mills and oil refineries)

The Safety Manager and Safety Officers realize the importance of maintaining a solid working relationship with clients, partner groups, and stakeholders.

## Future Growth



As the population of British Columbia continues to increase, keeping up with all the industry activities and the growth and economy of the province can become a challenge. One concern is that an increasing number of residential single family homes are installing elevators. Their installation and proper maintenance are presently unregulated and may be key safety issues for the BC Safety Authority in the years to come. The Elevating Device Program may need to expand their jurisdiction to include overseeing these residential areas.

The BC Safety Authority and major industry players suggest that with the globalization of the world economy and the accessibility of world travel, people expect to receive the same level of safety everywhere. Information on technology can be shared more easily than ever before as a harmonization of codes and

standards on a global level occurs. What this means is that the program needs to keep pace with technology in an elevating industry that continues to progress rapidly, as innovative safety features are being developed to produce safer products. This also means that Safety Officers need to upgrade their knowledge on the new products and that there may be more technical safety features to test during inspections.

The BC Safety Authority has a vision of being an internationally recognized authority by 2014 in the delivery of safety services. In order to reach that level, the Elevating Device Program strives to offer the best and most up-to-date programs and retain qualified people with expertise to deliver those programs.

## Revision History

Revision	Revision Date	Revision history	Revised by
00	2006/08/23	New release	Jeff Taylor
01	2006/12/20	Equivalent Standards Agreements – changed “contract” to “agreement.” Reformatted of headings and tables.	Jeff Taylor

## Approval

This document has been approved for adequacy by:



Irvine Jay  
Provincial Safety Manager – Elevating Device

December 20, 2006

Date