



Alberta Elevating Devices
& Amusement Rides
Safety Association

August 18, 2020

Dean Bruce
Technical Administrator Elevating Devices
Municipal Affairs/Safety Services
16th floor Commerce Place
10155-102 St
Edmonton, Alberta
T5J 4I4

Re: AEDARSA Special Program Report -Elevators Jan-Aug 2020

Dear Dean:

As you are aware AEDARSA has introduced several initiatives in the elevator discipline over the past few years. They covered a wide range of topics from training opportunities, declarations, audits and surveys. The initiatives have reached a point where we can now gather some data/results. We have reviewed and combined all these initiatives into the **AEDARSA Special Program Report**.

The intended goal of improved safety and reliability of elevators through focusing on accountability of Elevator Service Providers.

Attached is a summary of our Special Program with recommendations for consideration and discussion. The report will be sent via email and available in hard copy.

I look forward to discussing any questions you may have about the report.

Dean McKernon
AEDARSA VP Operations
CC GORD PATTISON AEDARSA CEO



Review of Special Elevator Programs and Projects

January 2020 to August 2020

Summary:

This report outlines the proactive initiatives that AEDARSA is employing to achieve greater compliance to the Elevating Devices Codes Regulation and the adopted ASME A17.1/CSA B44 Safety Codes for Elevator and Escalators in Alberta.

Historically, in-service inspections of existing elevating devices used a reactive model to gain compliance to the regulatory requirements by citing deficiencies for any non-compliance issues that might be present for a specific elevating device.

AEDSARSA believes that the existing in-service inspection model is important as one method to mitigate non-compliances and will continue to use it. **However, AEDARSA also strongly believes that reducing or eliminating non-compliance prior in-service inspections is the most positive method of gaining regulatory compliance.**

Therefore, AEDARSA has and will be developing addition methods of proactive regulatory compliance as follows;

1. Code and Regulation education and training programs that will be available to all stakeholder and in particular elevator mechanics.
2. Elevating Devices Services Providers (EDSP) general meetings so that the EDSP are able to hear and discuss how to gain compliance to the regulatory requirements.
3. Annual EDSP Declarations whereby the EDSP managers take responsibility for elevating safety compliance and do not rely on in-services inspections for their compliance oversight
4. Industry surveys to find out how gain greater regulator compliance

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i. Introduction:

This report outlines the results of AEDARSA's Special Programs and Projects from January 2020 to August 2020.

As part of AEDARSA due diligence and desire for overall safety improvements of the elevator safety system in Alberta, AEDARSA undertook a number of Special Programs and Projects to create opportunities for safety enhancement for all stakeholders.

AEDARSA projects and programs included;

- Category-1 Test and Brake Dismantlement December 31st, 2019
- AEDARSA state of industry meeting with ALL Elevating Devices Service Providers (EDSP) January 2020
- AEDARSA's Alberta Elevator Industry Seminar January 2020
- Site Evaluation of Category-1 Test and Brake Dismantlement May 2020
- AEDARSA Elevator Mechanic Survey June 2020

ii. Background:

AEDARSA's delegated administrative organization (DAO) responsibilities is to administer the safety programs for elevating devices in Alberta.

Historically elevating devices safety programs in Alberta were based on an "Hands-on Inspection" reporting model. However, AEDARSA feels that additional oversight programs and projects are essential to a delivering a higher level of safety and therefore has recently embarked on a number of industry unique proactive initiatives and enhancements.

iii. Summary of Program Enhancements:

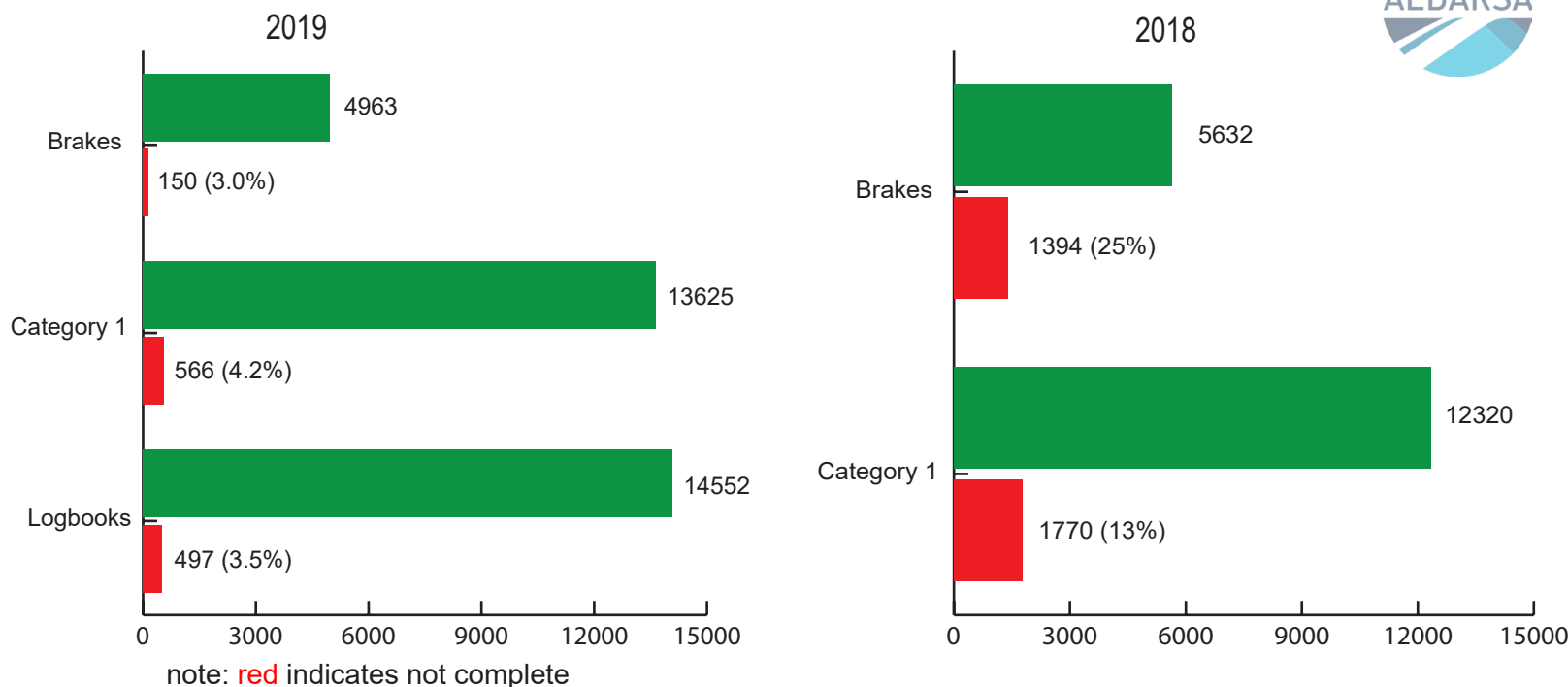
The following segments sets out each unique program and projects and the details of each can be found in the appendix;

a. AEDARSA Category-1 Test and Brake Dismantlement December 31st, 2019

On December 31, 2019 the Elevating Devices Service Provider (EDSP) submitted to AEDARSA their declarations verifying completion status of their Category-1 and Brake Dismantlement for all the devices under the EDSP portfolio.

This is the second year of the program requiring EDSP senior management to submit a signed declaration and a listing of devices under their Maintenance Control Plan (MCP).

The results of the December 31, 2019 were an improvement over the previous years results. (See results below):



This year's focus (January 1 to December 31, 2020), is to concentrate on having all owners who do not have EDSP or an MCP to be in compliance all regulatory requirements. It must be noted that the MCP Introduction Plan doesn't preclude the fact that all elevating will still be required to meet regulatory requirements through Alberta Municipal Affairs Elevator Agency "Hands-on" Quality Management Plan

In addition, AEDARSA will be requiring, an enhanced declaration for the 2020 operating year. All EDSPs will be required to verify compliance with the ASME A17.1-2013/CSA B44-13 Section 8.6 MCP and the *Elevating Devices Codes Regulation AR 192/2015*. via a declaration and a listing of all the devices listed in their maintenance portfolio are complete as follows:

- Logbooks up-to-date and signed,
- All the requirements of the MCP
- Brake dismantled according AR 192/2015
- Category-1 tests

AEDARSA will be having meetings with the EDSP in the fall of 2020 to discuss the effectiveness of their programs of 2019 and what the enhanced requirements that AEDARSA expects for the 2020 reporting year.

b. AEDARSA state of industry meeting with All Elevating Devices Service Providers (EDSP)

January 2020

In January 2020, a province wide EDSP meeting was held in Red Deer Alberta. All the EDSPs in Alberta and senior management from both Municipal Affairs and AEDARSA were in attendance.

This interactive meeting allowed all parties to discuss freely a range of topics that impacted the elevating device industry in Alberta. The topics were;

- Expectations of delivery of services by each of the stakeholder, Government, AEDARSA, EDSP and Owners
- Changes to compliance monitoring with the theme that "Safety can not be inspected in but

rather must be built in the EDSP maintenance programs”.

- Enforcement of inspection outstanding deficiencies would become stronger by the issuance of “Orders” that could mean the removal of elevating devices from service.
- There would be additional items added to the declaration of compliance program. The 2020 declarations will require all EDSPs verify that All of the Maintenance Control Program, Brake Dismantlement Category -1 Tests and on-site logbooks-up to-date and signed.

Feed back from the meeting indicated that EDSP appreciated an opportunity to discuss matters of common interest and look forward to similar meetings in the future.

c. AEDARSA’s Alberta Elevator Industry Seminar (AEIS) January 2020

In January 2020 AEDARSA held its 4th AEIS in Red Deer. The two-day seminar (workshop) was very successful with 120 participants that dealt with topics that ranged from worker safety, wire rope inspection and requirements for alterations of elevating devices delivered by speakers from across Canada and USA.

The AEIS is unique to other North American jurisdictions as it was for the elevator mechanics. AEDARSA’s belief is that the training seminar is the cornerstone to elevator safety in the province. If mechanics have the proper skills and information to complete required maintenance tasks, the rate of elevating device safety compliance will be higher.

In February 2021, AEDARSA will again be hosting a two-day Alberta Elevator Industry Seminar, (tentatively), in Calgary, that is open to all industry stakeholders. There is no cost for the seminar but the participants must pay for their own travel and accommodation. Based on positive feedback it is anticipated that additional number of mechanics will be in attendance.

d. AEDARSA Category-1 Test and Brake Dismantlement Site Evaluation June 2020

AEDARSA introduced an Elevating Devices Service Provider (EDSP) industry-wide program in 2018 and continued the declaration program through 2019. The EDSP would attest that all the elevating devices in their portfolio would meet the requirements for Category-1 Testing and Brake Dismantlement.

To ensure that the reported declarations were accurate, a sample site audit was conducted as part of AEDARSA due diligence verification.

Out of approximately 14000 declared units a sample of 45 were audited of these 20 were in Edmonton the reminder in Calgary. The sampling concentrated on 5 major EDSP since it covered about 90 % of the total industry.

The audit review was conducted over a period of 2 weeks in June 2020 and concentrated on 3 areas namely; Category-1 (including door speed requirement Test, Brake dismantlement and the logbooks for those items.

The EDSP Declaration Program is working reasonably well, although there are still opportunities to improve on an industry-wide basis.

The audits revealed the following;

- Brake dismantlement demonstrated that the EDSP were dismantling the brakes although 50% of EDSP cited ASME A17.1-2013/CSA B44-13 clause 8.6.4.6 rather than The Elevating Devices Codes Regulation AR 192/2015 requirement of 8.6.4.6.4.

- 80% of EDSP did not meet the requirements for having data test tags on the door operator identifying door speeds as required by Category-1 testing. However, AEDARSA believes the oversight can be corrected by the issuance of an information bulletin.

It is important to continue both the current in-service inspection and the EDSP declaration program continues so that safety improvements can be made to both site specific and province-wide issues.

e. AEDARSA Elevator Mechanic Survey June 2020

In June 2020 AEDARSA undertook to conduct a survey to get feedback from the elevator mechanics to see how effective the current elevating devices safety program was working and see if there were opportunities for program enhancement

The elevator mechanic survey reaching out to the IUEC (approximately 600 Alberta elevator mechanics) with 118 responses to 13 questions in the survey

The survey demonstrated there were differing opinions of how effective the current elevating devices industry program is functioning; however, the survey did reveal that the respondents cited similar opportunities for improvement

It was interesting to note that the recommendations made by the respondents for improvement, align themselves with AEDARSA's vision of how to make the current elevating devices industry safety program in Alberta more proactive thereby reducing the number of deficiencies cited during safety inspections.

The general findings of the survey were as follows;

- Logbooks should become standardized so all Elevating Devices Service (EDSP) Providers use the same logbooks
- Each logbook should have a covering factsheet that would provide an overview of the category-tests and major tasks that must be completed as part of the Maintenance Control Plan (MCP).
- There should be additional training for Elevator Mechanics for better Code and Regulatory understanding.
- There is a need to have full suite of code books that are readily available and the time necessary to read them is an issue.
- Presently many of the survey respondents felt they didn't have enough time to complete assigned task or felt they were pressured into signing off uncompleted tasks

AEDARSA intends to implement most of the suggested changes that AEDARSA has direct control over such as providing clear, consistent information through inspection bulletins and training for all the stakeholders wherever possible.

AEDARSA will also work with Municipal Affairs and Alberta Industry Training to possibly implement improvements, such as a standardized logbook and mandatory code update training.

While the current "Hands-on" inspection system is working well, AEDARSA believes that working with all the elevator industry stakeholders on a consistent basis will result in meaningful improvements

being made to the present safety system to the benefit of all stakeholders.

iv. Conclusion:

Based on the success of afore mentioned programs and training venues AEDARSA concludes that the programs must remain to give Albertans the best safety program possible.

However, AEDARSA will not be just satisfied with current initiatives but will continue to be innovative so the safety programs will be second to none.

vii. Recommendations:

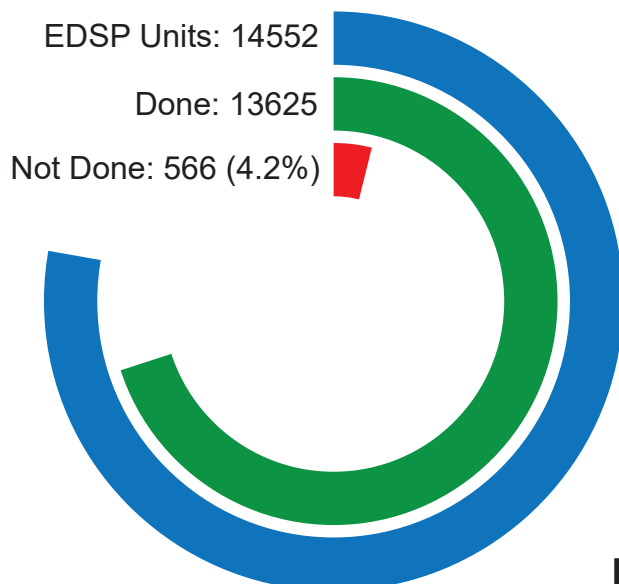
- a.** Consider mandating minimum quarterly maintenance that would require the EDSP to identify the tasks to be completed in each ¼ through out the year, which would also require a commitment to providing time to complete the tasks.
- b.** Mandate the ANNUAL Cat 1 tests and Brake dismantlement's, outlined in AR 192/2015, are required to be included in any maintenance programs as a supplement to min. maintenance requirements.
- c.** Standardize logbooks using a standardized cover sheet (factsheet). Companies are moving to electronic logbooks which means zero site logs are often incomplete. AEDARSA believes that as a minimum the Alberta specific requirements need to be up to date and available on-site. Should the need for additional logs arise the companies are to provide them on demand in either electronic or hard copy.
- d.** Improve delivery of elevator constructor training in relation to elevating device CODE interpretation and updates. Currently this is done through the IUEC education program by instructors internal to the IUEC. This training may be better suited to the DAO who are enforcing the code daily. Safety Codes officers are required to take code update training and maintain CEU's to maintain their certification.
- e.** Mandate continuing education and training CEU's for elevator constructors. Similar to Safety Codes Council - Safety Codes Officers require a minimum number of hours per year.
- f.** Apply administrative penalties for repeated non-compliance. There are new requirements under the Safety Codes Act that permit Administrative Penalties.
- g.** Consider licencing Elevator Companies through a Quality Management Plan (QMP). The DAO will be able to build on current programs; MCP review, Declarations and Auditing to determine compliance to the QMP. Safety Codes Act responsibilities are clear and accountability to them must be maintained. Failure to do so may result in fines (admin penalties) or suspension of Licence/Certification/Permit.

vii. Appendix; (Detailed Reports and Information)

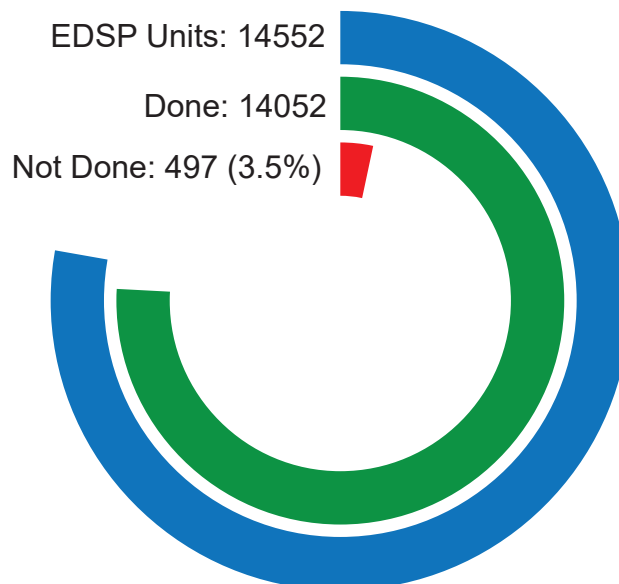


a. AEDARSA Category-1 Test and Brake Dismantlement December 31st, 2019 The “Compliance Monitoring Program Declarations” for 2019 operating year report, verifies Category-1 tests and brake dismantling and signing of logbooks completed by elevating devices service providers, which was due January 1, 2020, met and improved from the previous 2018 year. The initial findings indicate approximately 14,500 elevating devices were reported out of 14,800 units in the AEDARSA database. In general, the program was a success.

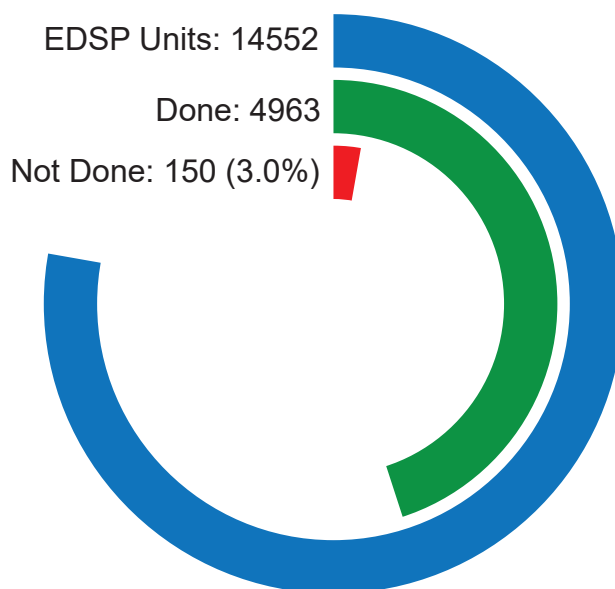
Category 1



Logbooks



Brakes



Based on the initial analysis of the data from the 2020 program AEDARSA along with individual meetings with the Elevating Devices Service Providers (EDSP) the program will continue and be expanded to include;

- Confirmation that all ASME A17.1-2013/CSA B44-13 section s 8.6 an 8.11 (as it pertains directly to the MCP)
- Confirmation that the logbook is signed for cat-1 test and non-MRL brakes are dismantled.
- Standardized reporting format M/S Excel.



Notice to all Alberta Elevating Devices Service Providers

As you know the Elevating Devices Codes Regulation AR 192/2015 requires all owners of elevating devices under the ASME A17.1-2013/CSAB44-13 Safety Code for Elevators and Escalators to have a Maintenance Control Program (MCP)

The Elevating Devices Code Regulation, Alberta Regulation AR 192/2015 requires the following items to be completed ANNUALLY:

- All the requirements of 8.6 and 8.11(as it directly pertains to the MCP 8.6) and
- MCP Category-1 tests, and
- Driving machine brakes are to be: dismantled, clean and all components and checked and tested from rated speed, and
- All logbooks are up to date, signed and clearly demonstrate compliance.

Therefore, to verify that these tasks are complete and in support of AEDARSA's Certificate of Operation Permit, this program is requiring that the elevator service provider complete a declaration (See Attached) demonstrating that they are in compliance with the All the requirements of 8.6 and 8.11 (as it directly pertains to the MCP 8.6) and Category- 1 Testing, Brake Dismantling and Logbook signatures.

The declaration and supporting elevating device numbers must be completed and sent to AEDARSA by January 1, 2021 attention:

Dean McKernon
209, 264 Midpark Way SE
Calgary, AB T2X 1J6
E-mail: dean.mckernon@aedarsa.com

If you have any questions, please contact Dean McKernon at: 403-216-5757

Thank you

Dean McKernon
AEDARSA, Vice President of Operations

Cc; Gord Pattison CEO, AEDARSA





2020 Elevating Devices Service Provider Declaration of Compliance (January 1, 2020 to December 31, 2020)

I declare to the best of my knowledge that as of December 31, 2020

Service Provider Company Name: _____
has completed the following based on our company's records (attached) as follows:

1. All ASME A17.1-2013/CSA B44-13 Section 8.6. and 8.11
2. All Category-1-Tests have been completed, and
3. All elevator machine brakes (be dismantled, cleaned and all components checked where onsite maintenance is possible) meet the requirements as set out in the Alberta Elevating Devices Code Regulation AR 19212015 Section 8.6.4.6.4 have been completed and
4. All logbooks are up to date, signed and clearly demonstrate compliance

Provide list of all the AEDARSA elevating device numbers (located on the mainline disconnect switch), using in the Excel Format Attached Below, you are currently providing services to under your company's Maintenance Control Program (MCP) including exceptions as noted below;

- a. If you cannot make the declaration because you have not maintained the elevating device for a complete year, or;
- b. For any other any units that do not meet items 1 and 2 above, identify them by device E # and provide rationale. (Example- elevating pending alteration inspection)

Elevator Service Provider Manager or Service Provider Designate:

Name(Print): _____

Signature: _____ Date: _____

Note #1: This declaration must be completed by: January 1, 2021

Note #2: If there are consistent systematic differences between the information supplied and actual field compliance monitoring by Safety Codes Officers, additional audits will be carried out at the elevator company's expense.

Note: It is important to remember that the "In-service" inspection program continues and all elevating devices in Alberta will be inspected in addition to AEDARSA's "Compliance Monitoring Program Declarations".

Note: It is important to remember that the "In-service" inspection program continues and all elevating devices in Alberta will be inspected in addition to AEDARSA's "Compliance Monitoring Program Declarations".

b. AEDARSA state of industry meeting with ALL Elevating Devices Service Providers (EDSP) January 2020

In January 2020, a province wide EDSP meeting was held in Red Deer Alberta. All the EDSPs in Alberta and senior management from both Municipal Affairs and AEDARSA were in attendance.

The program/meeting highlights;

Expectations



April 2020

Presentation Topics

1. Introduction
2. Past, Present and Future
3. Roles, AMA, AEDARSA (DAO) and Agencies
4. What is working or What is not working
5. How do we improve
6. What and when will change

January 2020

Expectations

1. Introduction?

This meeting is being held to review the system of code and regulatory compliance for elevating devices in Alberta to see what is working and what is not with ASME A17.1/CSA B44 requirements.

The review, in particular, will look at how to improve the system where it is not meeting expectations

January 2020

Expectations

What are the Roles: Government, AEDARSA (DAO), Agencies, Owners and Service Provider (EDSP)

1. Alberta Municipal Affairs-Sets Policies
2. AEDARSA (DAO) Tracks Inspections Data/Data
3. Agencies- Completes in-service inspections
4. Owners, EDSPs- responsible for ensuring elevating devices are properly maintained (in contact with service providers)
5. Service Providers EDSPs, responsible for ensuring elevating devices are safe

NOTE: It is important to remember that ONE can delegate duties, but ONE cannot abdicate their duties (accountability is required)

January 2020

Expectations

What has Changed From Past, Present and Future?

- More complex elevating devices
- More safety requirements
- More elevating devices from few 1000 to 30,000 today
- More specialized skills needed
- Equipment cannot be tested as it was in years past
- Safety of Elevating Devices can't be inspected "in"

January 2020

Expectations

What is not working?

1. MOST EDSP do not meet the Deadlines of completing Inspection Deficiencies
2. The real question for everyone is **WHY** are there deficiencies being found

January 2020

MCP Compliance Monitoring



February 1, 2020

January 2020

Expectations

What and when will change **2020/2021**

1. All deficiencies will be completed within time limits set by Inspection Report or an Order may be issued for the removal of the elevating device from use.
2. However there are other tools we can use to gain compliance such as:
 - a) Sending Registered Letter to the owners and EDSP
 - b) Providing the EDSP head office with reports of Non-compliance
 - c) Completing additional inspections at 3 times the normal inspection price
 - d) No new construction permits issued

January 2020

Effective February 1st 2020

| | | |
|---|---|---|
| ALL Directives issued will have a 60 day completion period of 90 days. | Letters for outstanding Directives will be sent to owners and EDSPs 30 days after 90 days are ORDERED will be issued. | ORDERS will be issued to BOTH OWNERS and EDSP |
| ORDERS will result in compliance at removal of the device from service within 30 days of order issue. | Extension of intervals will require an application to AEDARSA with a fee (environmental similar to a request for variance). | Category 1 tests may be carried out over the maintenance year. |
| Quarterly maintenance to include issue Category 1 Restriction | | Call 1 and Brake DECLARATION required after day 31 and are not inspected and tested to 100% by EDSPS. This is a safety issue. Insured units efforts are being made to complete. |

January 2020

Open for discussion, Under consideration:

| | |
|--|--|
| Regulated/Mandated: <ul style="list-style-type: none"> ➤ Licensing of Contractors ➤ Mandated Max Downtime ➤ Monthly Maintenance ➤ Expectations of 1% maintenance ➤ Cap on Min Maintenance costs ➤ Cost certainty for owners ➤ Improved safety enhancements ➤ Clarifying Regulations, Inspections and directives | Expectations of EDSP: <ul style="list-style-type: none"> ➤ Industry feedback ➤ Industry driven solutions ➤ Accountability ➤ Complete tasks, directives in a timely manner |
|--|--|

January 2020

In the near future

| | | |
|---|---|---|
| The DAO will conduct periodic audits of all EDSPs. | Extension of intervals will require an application to AEDARSA with a fee (environmental similar to a request for variance). | All of B & A MCP and S-11 will be required to have current declaration submitted. |
| Call 1 and Brake DECLARATION required after day 31 and are not inspected and tested to 100% by EDSPS. This is a safety issue. Insured units efforts are being made to complete. | | |

January 2020

We Your Input Needed for the future:

- Email your suggestions to: dean.mchey@aedarsa.com
- Deadline to submit is JAN 31 2020

January 2020

c. AEDARSA's Alberta Elevator Industry Seminar January 2020

In January 2020 AEDARSA held its 4th AEIS in Red Deer. The two-day seminar (workshop) was very successful with 120 participants that dealt with topics that ranged from worker safety, wire rope inspection and requirements for alterations of elevating devices delivered by speakers from across Canada and USA.

AEIS 2020

| TIME | ITEM | PRESENTER |
|-----------|--------------------------|-----------|
| 1300-1500 | AEDARSA SCO Meeting | AEDARSA |
| 1500-1630 | CECA Regional Meeting | CECA |
| | | |
| 1830-2100 | Meet and Greet Reception | AEDARSA |

| TIME | ITEM | PRESENTER |
|-----------|--|---------------------------|
| 600-700 | Breakfast | |
| 700-715 | Opening Remarks Welcome to 4th AEIS Facility Overview Review of Agenda Introduction of Special Guests Safety Talk | AEDARSA Jim Runyan |
| 715-800 | Elevator Incidents Worker Fatalities What the Industry Needs to do to Address the Important Issue | Marc Tevyaw Al Griffin |
| 800-830 | AEDARSA Update: Cab Modernizations Cat 1/Brake Declarations Inservice Inspection Directive Signoff | Dean McKernon |
| 830-945 | 3D Door Protection: Why we Need it | John Koshak |
| 945-1000 | Morning Coffee Break | |
| 1000-1130 | ASME A17.1-2019/CSA B44-19 Whats New | Jim Runyan |
| 1130-1230 | Lunch | |
| 1230-1400 | ASME A17.1-8.7 Alterations Review Requirements (Part 1) | Jack Day |
| 1400-1415 | Afternoon Break | |
| 1415-1530 | Wire Rope Inspection and Rejection Criteria ASME A17.6 | Kevin Heling |
| 1530-1600 | Daily Wrap-Up/Conclusion Round Table Discussion: Open Discussion on Questions From Participants | AEDARSA Industry Panel |
| | Evening Dinner - On Your Own | |

| TIME | ITEM | PRESENTER |
|-----------|--|----------------------------------|
| 630-755 | Breakfast | |
| 800-815 | Safety Talk | Jim Runyan |
| 815-945 | ASME A17.1-8.7 Alterations Review Requirements (Part 2) | Jack Day |
| 945-1000 | Morning Coffee Break | |
| 1000-1100 | Elevator Brake Annual Teardowns Lessons Learned | Dean McLellan |
| 1100-1200 | Elevator Safety | Bob Shepard |
| 1200-1255 | Lunch | |
| 1300-1400 | Enhancing Safety of Wire Ropes Using Real Time Inspection Technology | Ajay Bajaj Gerry Prezeau |
| 1400-1415 | Afternoon Break | |
| 1415-1500 | AEDARSA Update: Information Bulletins Round Table Discussion: Open Discussion on Questions from Participants | Al Griffin Industry Panel |

d. **AEDARSA Category-1 Test and Brake Dismantlement Site Evaluation June 2020**

The purpose of this report is to outline the results of an audit that was conducted by AEDARSA in June 2020 on the effectiveness of the EDSP 2019 Cat-1 and Brake declaration program.

Background:

AEDARSA introduced an Elevating Devices Service Provider (EDSP) industry-wide program in 2018 and continued the declaration program through 2019. The EDSP would attest that all the elevating devices in their portfolio would meet the requirements for Category-1 Testing and Brake Dismantlement.

To ensure that the reported declarations were accurate a sample site audits were conducted as part of AEDARSA due diligence verification.

Out of the approximately 14000 declared units a sample of 45 were audited of these 20 were in Edmonton the reminder in Calgary. The sampling concentrated on 5 major EDSP since it covered about 90 % of the total industry.

The audit review was conducted over a period of 2 weeks in June and concentrated on 3 areas namely; Category-1 (including door speed requirement Test, Brake dismantlement and the logbooks for those items.

Findings:

The audits revealed the following (See attached audit document appendix -1 and 2);

- Edmonton brake dismantlement demonstrated that the EDSP were dismantling the brakes.
- 50% of EDSP cited ASME A17.1-2013/CSA B44-13 clause 8.6.4.6 rather than The Elevating Devices Codes Regulation AR 192/2015 requirement of 8.6.4.6.4.
- 80% of EDSP did not meet the requirements for having data test tags on the door operator
- identifying door speeds as required by Category-1 testing.

Recommendations:

All EDSP should be contacted either via mail or office visits indicating where improvement are required for the following;

- EDSPs Logbooks should be updated to demonstrate that the AR 192/2015 requirement of 8.6.4.6.4. are being followed.
- EDSPs need to better understand the Category-1 requirements as it pertains to identifying elevator door speed and the identification tags.

Conclusion:

The EDSP Declaration Program is working reasonably well although there are opportunities to improve on an industry wide basis.

It is important to continue both the current in-service inspection and the EDSP declaration program so that safety improvements can be made to both site specific and province-wide issues.

Path Forward:

Meet with the EDSPs as soon as possible to share AEDARSA findings so provincial improvements can be made.

Audit Document:

| E-Number | Building | Address Edmonton | Cat | Brake | Door | Comments |
|----------|----------|------------------|-----|-------|------|---|
| 2.00 | E83 3218 | | P | P | x | No logbook listing AB Reg. for brake Cat-1 Not Complete –Door Speed Tag |
| 3. | E00 4706 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 4. | E82 2948 | | P | P | P | No logbook listing AB Reg. for brake |
| 5. | E00 5710 | | P | P | P | No logbook listing AB Reg. for brake |
| 6. | E17 0989 | | P | MRL | P | No logbook listing AB Reg. for brake |
| 7. | E83 3334 | | P | P | x | No logbook listing AB Reg. for brake Cat-1 Not Complete –Door Speed Tag |
| 8. | E00 7606 | | P | P | x | No logbook listing AB Reg. for brake Cat-1 Not Complete –Door Speed Ttag |
| 9. | E77 0267 | | P | P | x | No logbook listing AB Reg. for brake Cat-1 Not Complete –Door Speed Tag |
| 10. | E87 4361 | | P | P | x | No logbook listing AB Reg. for brake Cat-1 Not Complete –Door Speed Tag |
| 11. | E02 8205 | | P | P | x | No logbook listing AB Reg. for brake Cat-1 Not Complete –Door Speed Tag |
| 12. | E80 1849 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 13. | E00 3896 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 14. | E79 1622 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 15. | E00 3781 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 16. | E00 1693 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 17. | E79 1267 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 18. | E82 2762 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 19. | E85 4012 | | P | P | x | Cat-1 Not Complete –Door Speed Tag |
| 20. | E15 9906 | | P | P | P | |

| E-Number | Building | Address | Cat 1 | Brake | Door | Comments |
|----------|----------|---------|-----------|-------|------|--|
| E823044 | | | X | X | v | No logbook listing AB Reg. for brake |
| E823043 | | | X | X | v | No logbook listing AB Reg. for brake |
| E148992 | | | X EPO | | X | Cat-1 Not Complete –Door Speed Tag |
| E148993 | | | v | v | X | Cat-1 Not Complete –Door Speed Tag |
| E780711 | | | X EPO/FEO | X | X | Cat-1 Not Complete –Door Speed Tag |
| E002006 | | | X EPO | v | X | Cat-1 Not Complete –Door Speed Tag |
| E812147 | | | v | v | X | Cat-1 Not Complete –Door Speed Tag |
| E003150 | | | v | v | X | Cat-1 Not Complete –Door Speed Tag |
| E781130 | | | v | v | X | Cat-1 Not Complete –Door Speed Tag |
| E791595 | | | X EPO/FEO | v | | Cat-1 Not Complete –Door Speed Tag |
| E001372 | | | v | X | v | No logbook listing AB Reg. for brake |
| E002084 | | | X | X | v | No logbook listing AB Reg. for brake |
| E002277 | | | v | X | v | No logbook listing AB Reg. for brake |
| E791174 | | | v | X | X | Cat-1 Not Complete –Door Speed Tag |
| E812490 | | | v | v | v | Lots of NA marked on Cat 1 testing |
| E812497 | | | v | v | v | Cat 1 suspension means marked as NA |
| E791246 | | | v | v | X | Cat-1 Not Complete –Door Speed Tag |
| E060453 | | | X | v | v | FEO marked NA(?) / EPO not completed |
| E003222 | | | X | X | NC | Brakes - ASBESTOS not complete |
| E905024 | | | x EPO | v | v | Logbook not-up-date |
| E833249 | | | v | v | v | Brake dismantlement no record |
| E801827 | | | x EPO | v | v | Logbook not-up-date |
| E003025 | | | X | v | v | No logbook listing AB Reg. for brake |
| E822755 | | | X | v | v | FEO not done and Power Operation of Door Systems |
| E017980 | | | X | X | v | No logbook listing AB Reg. for brake |

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2. Site Verification Photographs

- b. Door speed data tag missing on 80% of all units audited



above example is what is required by code

e. Evaluation Report of the June 2020 Elevator Mechanic Survey Results

In June 2020 AEDARSA undertook to conduct a survey to get feedback from the elevator mechanics to see how effective the current elevating devices safety programs was working and see if there were opportunities for program enhancement.

The elevator mechanic survey reaching out to the IUEC (approximately 600 Alberta elevator mechanics) with 118 responses to 13 questions in the survey.

The survey demonstrated there were differing opinions of how effective the current elevating devices industry program is functioning; however, the survey did reveal that the most respondents cited similar opportunities for improvement.

| Question | Response | AEDARSA Response | AEDARSA Plan |
|---|---|---|--|
| 1. Would a standardized logbook be helpful | 90% are in favour of a standardized logbook | AEDARSA supports the concept of a standardized logbook | Since AEDARSA cannot make regulatory changes, we will forward this item to Alberta Municipal Affairs for their review and consideration for a possible regulation change |
| 2. Would a standardized fact sheet page in logbooks be helpful so that mechanics could sign off on Cat-1 and 5 dismantled requirements on one page? | Strong support for having a standardized fact sheet for all MCP 8.6 Category tests and regulatory requirements, such as dismantlement of brakes | AEDARSA supports the concept of a standardized fact page. AEDARSA believes this would help the industry meet their obligations in an effective manner | AEDARSA will work with Elevating Devices Service Providers to develop a standardized fact sheet page. This would allow mechanics performing tests to verify compliance |
| 3. Would code regulatory courses help mechanics better understand requirements? | Respondents indicated that they wanted additional training for both codes and regulations | AEDARSA has offered in the past to provide both code and regulatory training and will continue to do so. AEDARSA feels that mandatory update code and regulatory courses would be very beneficial | AEDARSA will reach out to the industry and offer a variety of training programs that will help the industry as a whole (AEIS or individual EDSP training). AEDARSA will work with Alberta Apprenticeship and Training to see if mandatory training is possible |

| Question | Repsonse | AEDARSA Response | AEDARSA Plan |
|--|--|--|---|
| 4. Do you have, or have access to code books and Alberta Regulation? | Respondents generally had access to code books and Alberta Regulation. Respondents raised questions on having time to read the code, and having access to the full collection of new and old codes. | AEDARSA feels that is essential to have access to all related codes such as; Electrical CSA C22.1, Elevator Code ASME A17.1/CSA B-44 and other ASME standards | AEDARSA will work with the elevator industry to provide better access to all relevant codes and handbooks |
| 5. Do you have enough time to complete required tasks? | 57% of respondents felt that they did not have enough time to complete maintenance tasks. Some felt that a task timeline would be useful. Some feel pressure to sign off tasks before they are completed | AEDARSA feels it is vital that elevator mechanics receive enough time to complete assigned tasks. There is currently no industry wide timeline outlining how long tasks should take. It is imperative that mechanics sign off tasks that are complete and don't sign off those that aren't | AEDARSA will be contacting all the EDSP providers as part of AEDARSA's ongoing meetings with the EDSP to establish how task completion times can be enhanced. In addition, AEDARSA will reach out to elevator industry stakeholders to ask if it is possible to develop a task timeline |
| 6. Do supervisors visit your jobsites? | The respondents reported that supervisors visits ranged from always to never, with the largest portion reporting infrequent | AEDARSA feels that in-depth supervision is a cornerstone to overall elevator safety. Supervision can assist in ensuring that all safety aspects of the EDSP MCP are being followed and taking remedial action to ensure any safety deficiencies are addressed | AEDARSA will support the concept that there is a strong need for supervisory oversight by meeting with the EDSP. It will be recommended that there be an effective paper trail to demonstrate that supervision has taken place |
| 7. Would additional AEDARSA information bulletins be of value? What topics would you like more information on? | The respondents felt strongly that information bulletins are very important and gave many suggestions on how to improve the current system | AEDARSA strongly agrees with the respondents. Education comes in many forms. It is essential that all industry has as much information at their disposal as possible to give them a clear, consistent, and pragmatic overview of all safety aspects of the industry | AEDARSA has recently developed a "NEW" website that gives better access to information bulletins. AEDARSA will be developing more information on an ongoing basis. AEDARSA's new website also includes social media accounts on Facebook, LinkedIn, and Twitter where information will be posted. An automated email subscription service will be implemented to send NEW data to subscribers once a bulletin is posted |

| Question | Response | AEDARSA Response | AEDARSA Plan |
|--|---|--|---|
| 8. Do you feel you can contact AEDARSA for information and questions? | 70% of respondents they can call AEDARSA confidently | While a positive rate of 70% is good, that still leaves room for improvement. AEDARSA wants to make it 100% of the time. When AEDARSA receives a call, we strive to handle that call confidently, no matter what the issue is | AEDARSA will make a very reasonable effort to ensure confidentiality for any caller. AEDARSA will ask stakeholders if they have noted any shortcomings in the current system. If this is noted, corrective actions will be taken |
| 9. Do you receive enough information to be able to complete all the tasks you are required to complete? | 64% of respondents did feel that they had enough to complete their tasks effectively | AEDARSA feels that proper information is the cornerstone for the safety of elevating devices and is required by MCP. It is not an option. | It appears that there is a gap in the information system that does not meet regulatory requirements. AEDARSA will be reviewing all the service providers MCP programs to see if they meet the intent of requirements |
| 10. Do you feel that current in-service inspections are conducted in a clear, consistent, and practicable manner by AEDARSA safety codes officers? | Most of the respondents indicated the following: 1. Inconsistency between SCO's with the application of the code 2. Greater clarity is required in what the deficiency really means 3. Some deficiencies were not addressed in the initials | AEDARSA realizes that a clear, concise, and pragmatic approach to inspections is critical. The comments are an indication that improvements are needed | AEDARSA will review our current practices to see what improvements can be made. AEDARSA will reach out to the EDSP and mechanics for further input suggestions |
| 11. In your opinion, is the current system meeting the needs of the riding public? | 61% of respondents felt that the present system is meeting the needs of the public. 39% felt that improvements should be undertaken, specifically with; 1. Allowing more time to complete tasks 2. Better training 3. Stronger enforcement 4. Mechanics not being allowed to shutdown devices that need repair | AEDARSA recognizes that any safety system can and should be improved on an ongoing basis. AEDARSA feels that under no conditions should an unsafe device be operational, and that mechanics will receive support from AEDARSA if the action is taken to shut unsafe devices down. AEDARSA may have in the near future the ability to impose financial penalties to EDSP, mechanics, and owners if satisfactory resolution cannot be obtained | AEDARSA will implement and provide, when necessary, information and training so that mechanics can carry out their tasks effectively. AEDARSA reiterates that if a mechanic finds an unsafe condition that a device be removed from service. AEDARSA will impose financial penalties to EDSP, mechanics, and owners once the Safety Codes Act is changed following the regulatory policies set out by Alberta Municipal Affairs |

| Question | Repsonse | AEDARSA Response | AEDARSA Plan |
|--|--|---|---|
| <p>12. Is there something you would like AEDARSA to provide for training or information to help you or your company?</p> | <p>74% of the respondents were in favor of additional training and information from AEDARSA.</p> <p>26% of the respondents felt that no additional training was required from AEDARSA.</p> <p>Consistent code and regulation application by SCO's was also cited as an issue.</p> | <p>AEDARSA feels that education and training for elevator industry, mechanics, as well as safety codes officers is paramount</p> | <p>AEDARSA will commit more resources to assist all industry stakeholders in meeting the highest code and regulatory requirements possible.</p> <p>The assistance will be possibly given through one of the following:</p> <ol style="list-style-type: none"> 1. Information bulletins and newsletters 2. Special code and regulatory training courses for individuals or groups 3. Webinars 4. Special telephone line "Ask the Inspector" |
| <p>13. Other questions an comments raised by the respondents</p> | <p>The respondents felt AEDARSA was doing a reasonable job and many questions have been addressed in previous questions, however:</p> <ol style="list-style-type: none"> 1. There needs to be consistency between inspections 2. Better training opportunities need to be provided 3. There isn't enough time for mechanics to complete tasks 4. More clarity needs to be in AEDARSA inspection reports 5. Communication between all stakeholders is crucial to ensure effective compliance | <p>AEDARSA appreciates all comments. They are a vital aspect of AEDARSA's vision to continuing improvement in the safety system.</p> <p>In general, AEDARSA feels that communication and training are key for continuous improvement for EDSP, mechanics, and safety codes officers</p> | <p>AEDARSA will continue to assist all stakeholders in meeting their obligations under the Safety Codes Act and supporting regulations.</p> <p>In the near future, the industry will see the following:</p> <ol style="list-style-type: none"> 1. A comprehensive communication strategy involving all stakeholders 2. Additional information bulletins 3. A more consistent, clear, and pragmatic approach to inspections 4. More training and educational opportunities |