

## IBE25-007 Clarification of Code Clause 8.6.1.1.4

## Subject: Introduction of Clause 8.6.1.1.4 in the 2019 edition of the ASME A17.1/CSA B44 Code

**8.6.1.1.4** was introduced to address ambiguity regarding the maintenance and performance expectations for certain safety devices and elevator-related systems. Particularly those installed in accordance with newer code editions that have not yet been adopted by a local jurisdiction. The clause clarifies that such devices must still be properly installed, maintained, and tested, even when not explicitly listed in the maintenance section of the Code.

To aid understanding, this bulletin separates the intent of clause 8.6.1.1.4 into two key parts.

## Part 1: Maintenance is Required for Devices and Systems Not Specifically Identified in Section 8.6

Not all safety components or systems are individually identified in maintenance Section 8.6. However, if any of the following are present, they must be maintained:

- Electrical Protective Devices referenced in Sections 2.26.2, 6.1.6, and 6.2.6
- SIL-Rated Devices referenced in Table 2.26.4.3.2
- Devices with AECO Certificates Certified under ASME A17.7/CSA B44.7

Clause 8.6.1.1.4 reinforces that these devices must remain in working order and be maintained to ensure continued safety, even if not explicitly listed in Section 8.6.

## Part 2: Installation and Maintenance of Systems and Safety Devices Introduced in Newer Code Editions

Many manufacturers design and install systems and safety devices in accordance with the **latest published Code edition**, even if it has **not yet been adopted** locally. Additionally, some owners request these features for convenience or safety when permitted under newer code editions. As a result, such devices or systems may be installed **before they are formally required or introduced** through the local code adoption process.

Clause 8.6.1.1.4 ensures that:

- These devices and systems must be **installed in compliance with the code edition in which they were first introduced**.
- This promotes a **standardized and predictable approach** to installation, function, maintenance, and inspection, avoiding inconsistent or partial performance.
- Devices and systems installed in advance of code adoption must be fully maintained.
- The **performance requirements and testing procedures** must be:
  - o Developed by the **manufacturer** or the **person or firm installing the device**, and
  - Included in the on-site documentation for reference by inspectors and maintenance personnel.

This requirement promotes consistent safety across a jurisdiction and ensures that modern technologies function as intended, are properly installed, inspected, and maintained, regardless of the pace of local code adoption.