

BWEA



Lifts in Wind Turbines & Machinery Directive - State of Play

Chris Streatfeild

Outline

- Recent history
- HSE Position
- HSE & BIS Project
- Draft Legal Advice
- Next Steps
- Positive progress
- Key messaging
- Partnership approach

History & Key Issues

- Lifts not a default safety technology (pre WAHR)
 - Generally smaller turbines/towers
 - No explicit regulatory framework (WAH)
 - No consensus/evidence to provide (operational/risk)
 - Significant climbs required (metres/day)
- Evolving knowledge & momentum (post WAHR)
 - Regulatory driver (Hierarchical approach – explicit)
 - TUV/NEL report – re decision making
 - Operational/Safety Benefits – Clearer
 - Growing % of new builds with lifts
- But...complex balancing of risk/benefits of any option

HSE Position April 2009

- Access equipment not “compliant” & “incompatible” to potential standards
 - Recommended “route map” to achieve “conformity”
 - HSE engagement to facilitate a formal *“recommendation for use”* for design and installation
 - Need for a compliant harmonised standard recognised
- Until gaps closed duty holders to address via risk assessment – training – SSW
 - (*Comment - Gaps can only be closed out through co-operation of all parties*)

HSE/BIS Project

- BIS commissioned HSE to conduct “market surveillance” to assess compliance with the Machinery Directive
- Assess “state of the art” for “Essential Health & Safety Requirements”
- To feed into EU decision making process
- HSE have agreed to a “review/feedback” session via BWEA
 - Details TBC (via BWEA)

Legal Commentary *

- Advice to BWEA in relation to lifts fitted in Wind Turbines
 - New Directive - Machinery Directive 2006/42/EC
 - Implications for the Wind Turbine Industry (According to group/category)
 - Potential litigation
 - Actions post 29 December 2009
- Lifts purchased must have the relevant Conformity/Type Test approval (MD 2006/42/EC) to confirm system (lift/turbine) compliant

* Draft for consultation. Not agreed BWEA position (See also below)

Next Steps

- Lifts/Machinery Directive Workshop
 - 16th February 2010
- CLC/TC88 revision of En50308
 - *“This European Standard specifies the safety requirements relating to commissioning, operation and maintenance of wind turbines for the purpose of harmonisation with the MD 06/42/EC”*
 - Lifts will be considered in the changes
 - BWEA to form UK Shadow Committee – Expressions of interest welcome
- CEN Harmonised Wind Turbine Lift Standard
 - Watch this space... (5 years???)

Positive Progress

- Practical steps have been made
 - Developers/OEM's/Lift Suppliers
 - Project specific ("HSE accepted") solutions have been agreed.
- Key industry players are taking the issue seriously
- Examples of innovation (technical & procedural) are occurring
- But...

Key Messaging

- Safety is our number one priority
 - BWEA promote and endorse highest H&S standards
 - All technology “safe & compliant”
- However - no “magic bullet” or “quick fix”
- Duty holders must make informed and risk based decisions which reflects:
 - Current state of knowledge (legal/technical)
 - Specific configuration of fleets/turbines/site
 - Consequential impact of wider risk assessment (+/-)
 - Assessment of options re: New/Retrofitting/Re-powering
- All risk control options must remain open
 - Risk based
 - Justified by available operational/safety evidence
 - “Compliant”

Partnership approach

- Industry
 - Improve communication and engagement to resolve issues across the supply chain
- Stakeholders
 - HSE/BWEA/Notified bodies/Standards bodies...
 - Difficult problems – require radical solutions
- A safe, sustainable & successful industry is not just achievable - it is essential.

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