

# INTERNATIONAL UNION OF ELEVATOR CONSTRUCTORS

LOCAL UNION NO. 9  
433 Little Canada Road E.  
Little Canada, MN 55117

AFFILIATED WITH THE AFL-CIO  
Phone: (651) 287-0817  
Fax: (651) 287-0820

March 16, 2023

The Honorable Michael Nelson, Chair  
Labor and Industry Finance & Policy Committee  
Minnesota House of Representatives  
585 State Office Building  
St. Paul, MN 55155

## **Re: Proposed Changes to Elevator Code and Licensing Statute (H.F. 2687)**

Chair Nelson and Members of the Labor & Industry Finance & Policy Committee:

I am writing on behalf of the International Union of Elevator Constructors (IUEC) Local 9 with regards to the changes to elevator code and licensing statutes proposed in H.F. 2687. Thank you for the opportunity to review and provide guidance on this important matter, and for your continued attention to the state elevator code.

The IUEC Local 9 is a trade union representing 542 members who construct, modernize, repair, and service elevators, escalators, moving walkways, and other conveyances across Minnesota, North Dakota, and Western Wisconsin. Above all we are committed to safety—both for our members who work on elevator equipment and for the public who rely on elevator equipment as they go about their daily lives.

Due to the safety hazards involved in elevator work and the complexity of elevator equipment, performing and supervising elevator work in Minnesota requires a license, established in state statute and administered by the Department of Labor & Industry. Our members are proud to meet the rigorous standards to earn their elevator constructor license and participate in ongoing continuing education to renew their license.

The language in H.F. 2687 is the product of many years of discussions and negotiations relating to removing certain equipment from the scope of licensed elevator work. Specifically, the bill seeks to allow work on conveyors, platform lifts, and dock levelers in Minnesota without the work or supervision of a licensed elevator constructor.

These changes reflect a consensus reached last session among the stakeholders involved, including my own union and representatives from the North Central States Regional Council of Carpenters (NCSRCC) and the Independent Millwrights Contractors Association (IMCA). While the crafting of this language predates my time leading IUEC Local 9, and I want to express my appreciation for the hard work of everyone involved that has brought the conversation this far.

Like many of you on the committee, I was elected in 2022. In the course of my duties leading IUEC Local 9, I hear from my members and from the contractors we partner with every day, and I quickly became well

versed in a growing concern with one aspect of the license exemptions included in H.F. 2687 for vertical reciprocating conveyors (line 2.6). At this time, we cannot support removing vertical reciprocating conveyors (VRCs) from the scope of licensed elevator work in Minnesota.

While conveyors are familiar to anyone who has spent time at an airport baggage claim or seen footage of boxes speeding down a belt at an Amazon fulfillment warehouse, VRCs are much less common. In fact, we typically see only a few dozen VRCs permitted for installation each year in Minnesota. Most of the VRCs installed require a human to unload material from the device, which means there is a human safety aspect to it which ties them closer to elevators on rated load and holding force. VRC manufacturers sometimes send units out that exceed the contract-rated load demand, where a licensed Elevator Journeyworker must wire and adjust the unit's controllers to not exceed its contract-rated load. This is required to prevent putting humans at risk due to overload conditions. Attached are several photos of both conveyors and VRCs, with explanations on each.

Our members' and contractors' concern with removing VRCs from the requirements of an elevator constructor license are based in safety. Elevator Constructors and the International Union of Elevator Constructors require training on The Nine Safety Absolutes which a licensed Journeyworker Elevator Constructor must adhere to:

1. **Fall Protection**
2. **Electrical Safe Work Practices**
3. **Jumpers**
4. **Lockout/Tagout**
5. **Mechanical Stored Energy**
6. **Car Top Access/Egress**
7. **Pit Access/Egress**
8. **False Car and Running/Working Platforms**
9. **Hoisting and Rigging**

Apart from the inclusion of VRCs, the rest of the language in H.F. 2687 as introduced reflects continued agreement from our union.

The IUEC recognizes the intent of the bill's proponents to address areas where state statute on elevator code can be enhanced, and we remain eager to engage in further discussions toward finding a path forward this session. We look forward to continuing discussions with the other stakeholders on this issue. Thank you for your consideration.

Sincerely,



Ryan Parkes  
Business Manager  
International Union of Elevator Constructors Local 9



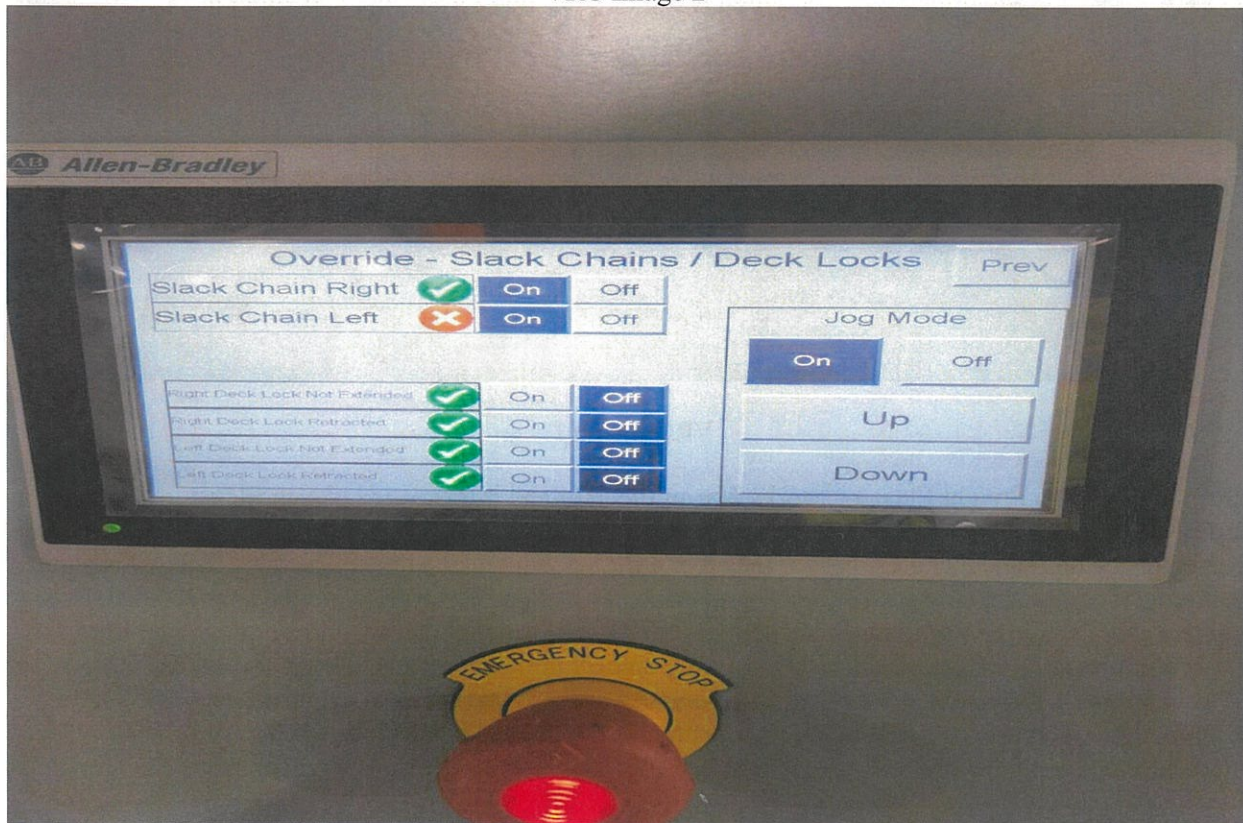
VRC Image 1

VRC: Looks like a Freight Elevator, works like an Elevator and is controlled like an Elevator. Safety issues where if not performed by a Licensed Elevator Journeyworker: There are switches and devices located inside this cage that must be worked on or adjusted, which falls under The Nine Safety Absolutes. Guarding of equipment (Images 1&2) is not adequate if not adjusted for proper rated contract load, workers may be injured due to machines, cables, chains or hydraulic lines that break or explode from overload situation. VRC Image 2 is using shelving bracket uprights tied to shelving if the VRC is not adjusted properly for contract rated load could create a catastrophic accident collapsing the shelving. Image 3 shows controller interfacing for safety monitor functions like an elevator controller. This interface should only be worked on by a Licensed Elevator Journeyworker who understands elevator functions.





VRC Image 2



VRC Image 3





Conveyors: Look nothing like VRCs or Elevators. Not controlled like VRCs or Elevators.