



To,
Dr. Iqbal Singh Chahal (I.A.S.),
Municipal Commissioner,
Brihanmumbai Municipal Corporation,
Fort, Mumbai 400 001.

Sub: Exemptions requested with respect to various conditions with respect to Fireman Evacuation Lifts insisted under NOC's issued by Chief Fire NOC

Respected Sir,

We wish to bring to your notice that in recent NOC's issued by Chief Fire Officer, certain standard conditions with respect to provision of 'Fireman Evacuation Lift' are insisted upon which are contrary to international fire norms and fire safety provisions of the NBC. Some of those conditions are as follows:

"Fireman Evacuation Lift car doors and landing doors shall have two hours fire resistance and shall have provision of glass vision for both doors of minimum 1 ft. X 2 ft. And the glass shall also have two hours fire resistance"

"Fireman Evacuation Lift car shall be of made of non-combustible material including interior having minimum two hours resistance."

During development and procurement of such fireman evacuation lifts, it was found that such requirements from the CFO for the vertical transport are unique only to the city of Mumbai (India), which in turn limits global manufactures to participate in the supply and installation of said lifts. It is pertinent to note that reputed global elevator manufacturers not only bring a wealth of expertise and quality but also experience when they install different types of elevators at heights of +150/200m. It has been communicated by the elevator vendors that such clauses are not found internationally and hence none of the renowned global suppliers such as Kone, Schindler, Mitsubishi, Otis, TKE, Fujitec, etc. have previously manufactured the required components as required in the CFO NOC especially for two conditions mentioned hereinabove. Moreover, it appears that such conditions have been imposed to favour certain local vendors who have relatively limited experience in development of such elevators, especially for high rise buildings.

Furthermore, irrespective of the conditions mentioned hereinabove, shafts of fireman evacuation lifts are already equipped with dedicated pressurized smoke lobby with no other lift opening into the same lobby and shafts individual pressurised to prevent smoke from entering. Furthermore, both lift shaft and landing doors have 2-hour fire resistance rating.

An additional challenge that has been encountered is that there are no suppliers available to manufacture lift car and landing door that integrate the 'fire-resistant glass visions panel' that can also certify or guarantee the safety of the fireman evacuation lift by issuing a certificate. This therefore implies that instead of having the benefit of the visual panel it may become a weak point compromising the fire safety by allowing smoke or fire to penetrate the barrier which was not required otherwise.

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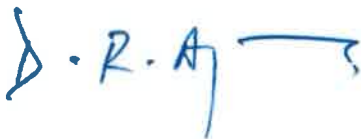
Material selection of which the lift car shall be made of is required to be 'non-combustible including interior having minimum two hours resistance' which is a condition certain local vendors have agreed to comply and certify. However, global manufacturers have clearly established that such conditions cannot be complied. Careful selection of non-combustible materials can be made to ensure the integrity of the cabin is maintained in term of fire safety, however, having a third-party system certificate guaranteeing minimum 2 hour fire resistance for entire cabin cannot be guaranteed via a certificate by any global lift vendor. In addition to the above, due to the fireman evacuation lift being located in the Fire Tower with Smoke check lobby, it is highly improbable that a fire source would be in the evacuation lift area.

Hence, from the above, it is clear that such requirements imposed by the Chief Fire Officer in the NOC's issued are arbitrary and cannot be complied practically and seem to be imposed to favor certain local vendors with limited experience both in terms of quality and delivery. Hence it is requested compliance of the two conditions mentioned hereinabove may be exempted since this will not only deter completion of building as per required standards but also compromise life safety and security which is the true essence of the NOC issued by the CFO.

Yours sincerely,
For **CREDAI-MCHI**



Domnic Romell
President



Dhaval Ajmera
Hon. Secretary