



LEEA 086 - Guide to supply documentation and the marking of lifting sling components within the UK and EEA



DOCUMENT TITLE

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1.0 Introduction

There are a huge variety of components that can be used to make up a lifting sling (sling) assembly and the legislation that applies to them also varies considerably. Some of these components are covered by harmonised standards whereas others are not. Also the status of some of these harmonised standards is also questionable and under scrutiny. It is these factors that give rise to much confusion across the UK and Europe to the requirements for documentation and marking and, in particular, the documentation and marking concerning conformity assessment. This guidance document has therefore been written to explain the requirements and add clarity to this very common issue.

2.0 Legislation considered directly relevant to this guidance.

When selling components for use in sling assemblies consideration shall be given to following key legislation.

- Section 6 of Health and Safety at Work etc Act 1974 (HASAWA)
- Regulation 10 of Provision and Use of Work Equipment Regulations (PUWER)
- Regulation 4(a) of the Lifting Operations, Lifting Equipment Regulations (LOLER)
- The Supply of Machinery (Safety) Regulations 2008 (SOMSR)
- The Machinery Directive 2006/42/EC (MD) and associated guidance

3.0 Types of sling components.

Components used in sling assemblies can be considered in terms of three distinct categories according to supply legislation;

1. Chain, rope and webbing
2. Lifting accessories
3. Components.

The following sections define each of these categories according to the legislation.

3.1 Chains, ropes and webbing.

The products designated by the terms 'chains, ropes and webbing' are chains, ropes and webbing designed and constructed for incorporation into lifting machinery or lifting accessories for lifting purposes. Chains, ropes and webbing designed for purposes other than lifting are not subject to SOM(S)R or the MD (supply legislation) but are covered by section 6 of HASAWA.

Since chains, ropes and webbing for lifting purposes are among the products designated by the term 'machinery' in the broad sense, manufacturers of chains, ropes and webbing for lifting purposes must fulfil all of the obligations set out in all of the supply legislation listed in section 2.0. This includes conformity assessment and conformity marking.

It is important to note that the above only applies to chains, ropes and webbing placed on the market by the manufacturer in the form of bulk reels, drums, rolls, coils or bundles. They may be supplied by the manufacturer to distributors, manufacturers of lifting machinery or lifting accessories, or to users.

The obligations of the supply legislation applies only when the chains, ropes or webbings are first placed on the market. The distributor or user does not become a manufacturer in the sense of the supply legislation by cutting individual lengths for incorporation into lifting accessories or lifting machinery. Therefore, the obligations of the supply legislation do not apply again to cut lengths of chain, ropes and webbing cut from the products already placed on the market by the chain manufacturer. Such lengths are to be considered as components of the lifting machinery or the lifting accessories into which they are incorporated.

However, distributors of chain, ropes and webbing **must** ensure that the relevant conformity assessment documents are supplied with the cut length to the manufacturer of the lifting machinery or lifting accessory or to the users



3.2 Lifting Accessories.

Lifting accessories are also designated by the term ‘machinery’ used in the broad sense.

Lifting machinery, i.e. a crane, usually has a device for holding the load such as, for example, a hook. Such load holding devices incorporated into lifting machinery are not to be considered as lifting accessories. However, given the varied shape, size and nature of the loads to be lifted, equipment is often placed between the holding device of the lifting machinery and the load, or on the load itself, in order to hold the load during the lifting operation. Such equipment is referred to as a lifting accessory. Products that are independently placed on the market to be incorporated into loads for this purpose are also considered as lifting accessories within the scope of the supply legislation. This is not true of user legislation and once such items are incorporated into the load then they become a part of that load.

The legislation defines lifting slings and their components as lifting accessories. It implies that the equipment is intended to be used as an independent lifting sling, or in a variety of combinations. The lifting slings to be made up by the user, for example, a made-up multi-leg sling, is considered as a lifting accessory. On the other hand, components that are intended to be incorporated in slings and that are not intended to be used independently to make up a sling are not considered as lifting accessories.




Table 1. Examples of Lifting Accessories

	<p>Swivel eye bolt</p> <p>Conformity mark, Declaration of Conformity and the Manufacturer’s Instructions for use</p>
	<p>Textile lifting point</p> <p>Conformity mark, Declaration of Conformity and the Manufacturer’s Instructions for use.</p>
	<p>Weldable lifting point</p> <p>Conformity mark, Declaration of Conformity and the Manufacturer’s Instructions for use.</p>
	<p>Shackle</p> <p>Conformity mark, and Declaration of Conformity and the Manufacturer’s Instructions for use.</p>

3.3 Components.

There is an industry assumption that components of a sling are considered as partly completed machinery. However, it is important to understand that they cannot be considered as such because they are defined as equipment that is almost machinery in the 'strict' sense. Therefore, components of a sling, which is machinery in the broad sense, cannot be considered as partly completed machinery. Moreover, partly completed machinery does not require conformity marking.

Table 3 Examples of sling components not covered by SOMSR and MD

	<p>Chain connector link</p> <p>No conformity assessment marking or documentation required</p> <p>Manufacturer certificate is required & Instructions for use</p>
	<p>Clevis hook</p> <p>No conformity assessment marking or documentation required</p> <p>Manufacturer certificate is required & Instructions for use</p>
	<p>Reeving link</p> <p>No conformity assessment marking or documentation required</p> <p>Manufacturer certificate is required & Instructions for use</p>

4.0 Documentation and marking requirements.

For each of the products described in section 3, the following sections detail the minimum legal marking requirements of the products being placed on the UK and EU markets. If manufacturing to a specific standard additional marking requirements may be required.

4.1 Chain, rope and webbing

The following guidance applies to chain, rope and webbing intended to be incorporated into lifting equipment. In this case the conformity requirements will largely depend on the market to which the product is being placed and there are three distinct options;

1. CE marking and EC Declaration of Conformity
2. UKCA marking and UK Declaration of Conformity
3. UKNI marking and EC Declaration of Conformity

Note: A combination of one & 2 are also permissible (see LEEA-30.1e4 – 30.1e6)

4.1.1 CE marking and EC declaration of conformity.

For chain, rope and webbing placed on the EU market, there is no change in the requirements and the bulk reel, drum, bundle, roll or coil shall be CE marked and issued with an EC Declaration of conformity.

For LEEA members, the documentation must be compliant with the minimum requirements specified in LEEA 030.1e1-3

4.1.2 UKCA marking and UK declaration of conformity.

If your product is to be placed on the market in Great Britain after 1st January 2023, then you will need to apply the UKCA marking and issue a UKCA declaration of conformity. It is recommended that you do this as soon as possible and it is acceptable to begin using this documentation and marking requirement now. (Documents LEEA 030.1e7-e9)

The UKCA mark shall be marked in the same manner as that required for the CE mark and is affixed to the bulk drum, roll, coil, bundle, etc.

For LEEA members the document shall meet the minimum requirements of LEEA 30.1e5.

4.1.3 UKNI marking and EC declaration of conformity

For self-certified products placed on the market in Northern Ireland the CE mark and EC declaration of conformity will be acceptable.

However, for products requiring third party approval and the approval has been done by a UK approved body, then the product will be marked with UKNI mark in addition to the CE mark. The document will still be an EC Declaration of conformity, but these products will not be accepted on the EU market. They can be used anywhere in the UK.

4.2 Lifting accessory documentation and marking.

The documents and marking required by the legislation really depend on the market to which the product is being placed. Owing to Britain's exit from the EU we now have three distinct conformity assessment requirements.

1. CE marking and EC Declaration of Conformity
2. UKCA marking and UK Declaration of Conformity
3. UKNI marking and EC Declaration of Conformity

Note: A combination of 1 & 2 are also permissible (see LEEA-30.1e4 – 30.1e6)

4.2.1 CE marking and EC declaration of Conformity

Following the United Kingdom's withdrawal from the European Union, for lifting accessories placed on the EU market, there is no change in the requirements and the products shall be CE marked and issued with an EC Declaration of conformity. For LEEA members the documentation must be compliant with the minimum requirements specified in LEEA 030.1e2.

4.2.2 UKCA marking and UK declaration of conformity.

If your product is to be placed on the market in Great Britain after 1st January 2023, then you will need to apply the UKCA marking to either the product itself if possible or alternatively follow the information given by the Department for Business, Energy & Industrial Strategy (BEIS):

Continuing to allow businesses to affix the UKCA marking, and to include importer information for products from EEA countries (and in some cases Switzerland), on an accompanying document or label until 31 December 2025. This will allow business to adjust their product design to accommodate marking changes at a convenient and cost-effective time.

You will also need to issue a UKCA declaration of conformity. It is recommended that you do this

as soon as possible and it is acceptable to begin using this documentation and marking requirement now. (Documents LEEA 030.1e7-e9)

With small lifting accessories, it has been recognised by LEEA that it is difficult to mark the lettering of the UKCA due to the size requirements of a minimum height of 5mm

For LEEA members the document shall meet the minimum requirements of LEEA 30.1e5.

4.2.3 UKNI marking and EC Declaration of conformity.

It is unlikely that general purpose lifting accessories will be subject to this requirement and for most products placed on the market in Northern Ireland the CE mark and EC declaration of conformity will be acceptable.

However, for products requiring third party approval and the approval has been done by a UK approved body, then the product will be marked with UKNI mark in addition to the CE mark. The document will still be an EC Declaration of conformity, but these products will not be accepted on the EU market. They can be used anywhere in the UK.

4.2.4 Sling components.

These items are not within the scope of the supply legislation as explained in section 3. For the UK they fall within scope of the HASAWA, but this does not specify any specific form of documentation. In the past it was largely accepted that a test certificate would satisfy the requirements of the UK supply legislation, but LEEA now recommends that for such products a manufacturers certificate is issued in accordance with the standard being worked to, or in the absence of a standard in accordance with LEEA 064 *Guidance to conformity marking of lifting products for which there is no harmonized standard - Version 2 - February 2022*

The marking requirements would also be in accordance with the standard, but it is important to note that components would not have any conformity assessment marks.