

BUILDING A **DEFENSIBLE** COMMISSIONING STRATEGY

LEV Commissioning: Getting It Right

25 minutes + questions

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LEV COMMISSIONING: **GETTING IT RIGHT**

The National LEV Duty Holder Conference



11 SEPTEMBER 2026



HILTON
EAST MIDLANDS

Free to attend



A question that matters

Can we prove this LEV system was capable of controlling the hazard as intended — from day One?

If the answer is unclear commissioning has not given you assurance — it has only given you paperwork

Legal risk

Difficult to defend adequate control under scrutiny

Health risk

Stable airflow may still mean poor control

Governance risk

Records may fail when challenged by HSE, insurers etc

The common trap in TExTs

LEV system can look stable without proving adequate control

What the record shows

Commissioning	850 m ³ /hr
Year 1	840 m ³ /hr
Year 2	870 m ³ /hr
Year 3	830 m ³ /hr
Year 4	850 m ³ /hr
Year 5	820 m ³ /hr

Looks consistent. But was 850 m³/hr enough?



‘Condition’ is not capability

TExT can confirm a system is still near its benchmark but cannot rescue a benchmark that was never proved adequate.

‘Consistency’ is not control

A stable, repeatable airflow reading is not the same as “effective control”.

Missing proof?

Key evidence original benchmark represented adequate control under real operating conditions.

Commissioning and TExT - answer different questions

Confusing them is one of the most common weaknesses in LEV governance

COMMISSIONING

Is the system capable of adequately controlling the identified hazard?

- Establishes **capability**
- Defines the **benchmark** which
- Creates the **reference** for future TExTs and assurance

TExT

Is the system still performing in line with established benchmark?

Yes if it ..

- Confirms **condition**
 - Compares **current data** in line with benchmark
- But it
- Cannot establish an **original control benchmark**

Why commissioning becomes indefensible

Usually not because of one missing number — but because the evidential chain is broken

No design intent

Hazard(s), control strategy and target performance never clearly defined

Measurements without meaning

Readings were taken, but not linked to a control requirement or standard

Competence assumed

Qualification was treated as proof of applied commissioning judgement

Change unmanaged

System or process changes occurred without re-commissioning triggered

The issue is not procedural compliance alone. It is evidential integrity

A defensible commissioning strategy

5 stages - turn technical activity into governance-level evidence



Defensible commissioning is not “more paperwork”. It is better-structured evidence

When the 5 stages are satisfied, commissioning provides governance-level confidence

What Duty Holders need

A commissioning file should allow a third party to follow the reasoning

Hazard



What substance and exposure mechanism are we controlling?

Intent



What control strategy and performance criteria were specified?

Verification



How was the installed system checked against that intent?

Benchmark



What measured values define adequate capability?

Assurance



How will future TExT and changes reference that benchmark?

If one link is missing, the evidential argument may fail

Before accepting a Commissioning Report

Ask 6 questions

You don't need to be an LEV specialist — but you must know what good evidence looks like

1 **What** was the design basis for this system?

2 **How** was control capability verified under real operating conditions?

3 What **benchmark** was established... and why is it adequate?

4 **How** will future **TExTs** reference this benchmark?

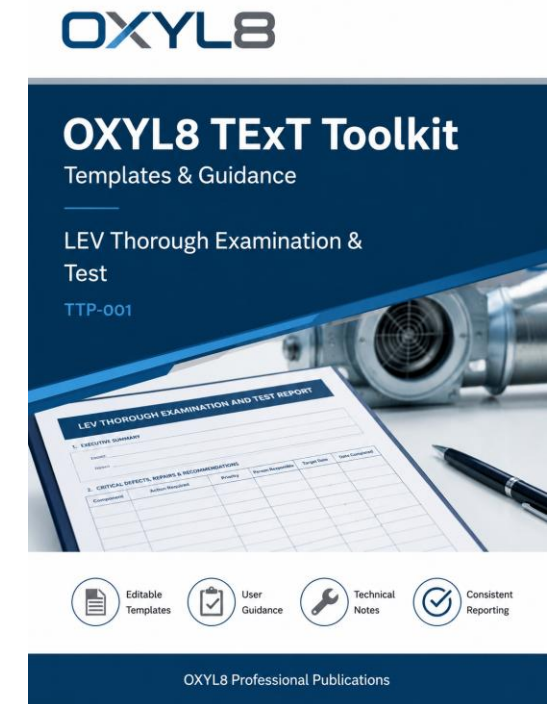
5 **Who** verified: **Competence** and independence?

6 **What** changes would trigger re-commissioning?

These questions should drive procurement, appointment, handover and future review

Use the handouts

Three OXYL8 publications sit behind the strategy — not as reading homework, but as practical reference support



Beyond TExT • Defensible LEV Commissioning • Commissioning vs TExT

Commissioning is where exposure control becomes

DEFENSIBLE ... OR NOT

1. Define intent

Made hazard, control strategy and performance criteria explicit.

2. Prove capability

Verified installation and benchmark performance against intent

3. Preserve evidence

Used commissioning data as reference for TExT and change control.

If those 3 things are missing

Duty Holder is relying on faith rather than evidence

Questions and discussion

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