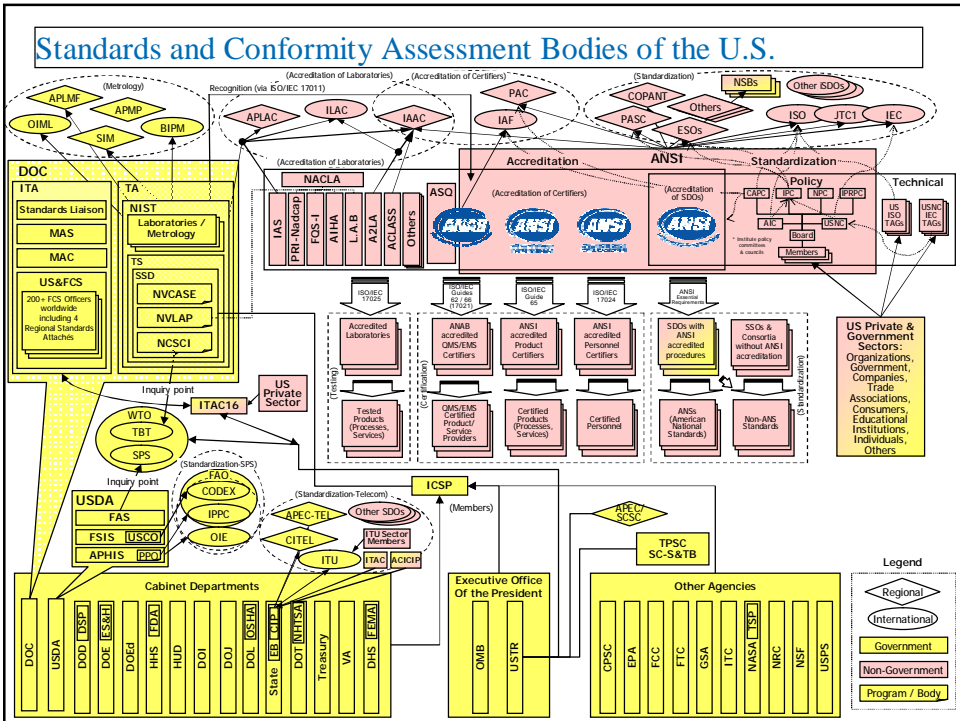




# The certification decision for PPT manufacturers

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International Safety Equipment Association





## ISEA is the association for PPT

Head protection	Fall protection
Eye and face protection	High visibility apparel
Hearing protection	Gas detection instruments
Respirators	First aid kits
Protective clothing	Emergency eyewash and shower
Gloves	Personal hydration systems

- ANSI accredited standards developer
- Participant on other national and international standards committees and boards
- Active partner with NIOSH, OSHA



## ANSI/ISEA standards

- ANSI/ISEA 101-1996 (R2008) - Limited-Use and Disposable Coveralls - Size and Labeling Requirements
- ANSI/ISEA 102-1990 (R2009) - Gas Detector Tubes - Short Term Type for Toxic Gases and Vapors in Working Environments
- ANSI/ISEA 104-1998 (R2009) - Air Sampling Devices - Diffusive Type for Gases and Vapors in Working Environments
- ANSI/ISEA 105-2005 - Hand Protection Selection Criteria
- ANSI/ISEA 107-2010 - High-Visibility Safety Apparel and Headwear
- ANSI/ISEA 110-2009 - Air Purifying Respiratory Protective Escape Devices
- ANSI/ISEA 113-2008 - Fixed and Portable Decontamination Shower Units
- ANSI/ISEA 207-2006 - High Visibility Public Safety Vests
- ANSI/ISEA Z87.1-2010 - Occupational and Educational Eye and Face Protection Devices
- ANSI/ISEA Z89.1-2009 - Industrial Head Protection
- ANSI/ISEA Z308.1-2009 - Minimum Requirements for Workplace First Aid Kits and Supplies
- ANSI/ISEA Z358.1-2009 - Emergency Eyewash and Shower Equipment



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## We've been here before

- 1974 – NIOSH publishes rule proposing certification of head protection and other PPE
- 1976 – NIOSH withdraws proposal, initiates new rulemaking to certify head protection
- 1978 – NIOSH withdraws head protection NOPR, stating intent to develop certification programs internally under agency guidelines
- 1979 – ISEA objects to NIOSH proposal for non-mandatory certification program; approves position statement calling for NIOSH testing and approval, and OSHA mandate for certified PPE
- 1980 – ISEA establishes Safety Equipment Institute as third-party certification organization



## Chronology, continued

- 1981 – NIOSH decides to focus on respirator certification and abandon other PPT testing
- 1988 – OSHA publishes NRTL regulation
- 1990 – ISEA testifies in favor of third-party certification at OSHA hearing on revision to 29 CFR 1910 Subpart I
- 1992 – European PPE Directive 89/686/EEC goes into effect, mandating conformity assessment including third-party testing for most PPE
- 1994 – OSHA publishes PPE rule without third-party certification requirement, citing voluntary compliance with product standards
- 2001 – NIOSH establishes National Personal Protective Technologies Laboratory (NPPTL)



## The certification decision

- Risk
  - What is the risk to the user of noncompliant PPE?
  - What are the penalties for allowing non-conforming products into the marketplace?
- Regulatory requirements
  - What degree of certification does the government demand?
  - Does the standard require certification?
- Market factors
  - Does the customer expect independent certification?
  - Are competitors certifying their products? Are they bringing questionable products into the marketplace at lower prices?



## The certification decision

- Self-certification (manufacturer's declaration of conformity)
  - Relies on integrity of the producer, informed and vigilant user base, and aggressive legal system
- Third-party certification
  - Conformity assessment by an independent organization
  - May also respond to market demand
  - Requires independent lab evaluation, surveillance of manufacturer's QA system, periodic follow-up
  - The certification organization stands behind the product's conformity to a standard



## It's a business decision

- Where do I want to sell my products?
  - What kind of certification is required?
  - Will the authorities accept another country's certification or mark?
- What level of certification do customers and users expect/demand?
- What's the cost difference?
- Do I test in-house or use an outside lab?
- Does my QA system meet requirements?
- What are my competitors doing?
- How do I ensure my OEM suppliers are conforming to standards and regulatory requirements?



## Open questions

- How do responsible manufacturers compete against suppliers of substandard PPE?
  - Distributors importing and private labeling
  - Customer not looking beyond the product marking
- Should OSHA require PPE approval beyond respirators?
- ISEA evaluating its position on certification
  - Certification requirements in ANSI/ISEA product standards
  - Conformity assessment standard separate from product standards (a la ISO/IEC 17007)



[www.safetyequipment.org](http://www.safetyequipment.org)

