The certification decision for PPT manufacturers

Dan Shipp
International Safety Equipment Association
ISEA is the association for PPT

- Head protection
- Eye and face protection
- Hearing protection
- Respirators
- Protective clothing
- Gloves
- Fall protection
- High visibility apparel
- Gas detection instruments
- First aid kits
- Emergency eyewash and shower
- 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 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 287.1-2010 - Occupational and Educational Eye and Face Protection Devices
- ANSI/ISEA 289.1-2009 - 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)

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