SUMMARY, EUROSHNET Conference, Helsinki, 26-28 June 2012

Workshop G
Testing and certification and the New Legislative Framework
(Focus on PPE)

Introductory statement G.3:

Supporting manufacturers in designing and producing safe products: The role of T&C.

Eva Cohen, Unit of Protective Clothing and gloves, CNMP, INSHT

This statement is related to the role of Testing and Certification Bodies in supporting manufacturers in designing and producing safe PPE.

As a Notified Body (NB), we act as a third party in the PPE assessment for their conformity with the PPE Directive and therefore there is an intervention, although indirect and never as an interested part, in the improvement of the design and production of the PPE while reporting test results of the compliance with the applicable requirements and while reporting also as a third party in the production control periodically.

This support is therefore a natural outcome of our job as a conformity assessment body. Prior to start the process of evaluation, when an application for an EC type certification is presented to a NB, depending on the type of manufacturer (micro, small and medium-sized enterprises (SMEs), new PPE manufacturers) there is an important task of advice, which includes: support on the Community legislation, support on the harmonized standards to apply and support even on the definition of the risks the new PPE is expected to protect against. This happen especially when the NB is also an OSH organization. This part of the job, covering lacunae, is a first approach to supporting manufacturers in designing products.

In a second stage, when issuing test reports, an important source of information is the then available for the manufacturer which may have to enhance some properties or design aspects of the PPE to achieve the desirable performance level.

Moreover, we are quite often contacted by manufacturers of products already in the market, not certified as PPE, but which a clear intended use of protection against a certain level of risk. These products have to be considered in fact PPE and therefore they have increasing problems to sell their products. The market is asking more and more CE marked PPE as a guarantee of safe products and manufacturers have to adapt their product for complying with the Directive.

A difficult part for NB comes, in that cases, when there are not harmonized standards covering the product. In those cases, NB cannot take them as a reference neither the manufacturer as a reference for refining the design. A certification based on Essential Requirements is needed then, using other technical specifications, applying only partially

any other product related standard with a property performance in common and making technical decisions based on their technical competence. This tricky situation has not sometimes an easy resolution and not very satisfactory options may have been followed as:

-The rejection of the application of EC type certification from the NB because of a lack of confidence on how to certify due the absence of standards. The consequence for the manufacturer is then quite undesirable with no support to keep the product on the market.

-The push of a potential standard in CEN related with these product, if the NB is involved in standardization, which is not indeed a fast process and could result again in that the manufacturer is not able to keep the product on the market.

As a conclusion, the support to manufacturers in designing is a an outcome inherent to our task of evaluating the conformity of PPE but it is endangered when not enough technical tools are available as products not yet covered by standards, specially when the NB is not an organization in which OHS experts are involved.