

## Pressemitteilung Press Release

**060/2015 - August 2015**

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### ***SME Safety, Brüssel Stellungnahme zu ISO NWIP 17420 Atemschutzgeräte***

Gerne möchten wir Sie über den aktuellen Stand auf dem Laufenden halten.



To: ISO Member Bodies - National Mirror Committees of ISO/TC 94 on Personal safety  
- Protective clothing and equipment

Cc: European Commission, DG GROW Director General Daniel Calleja Crespo  
Cc: CEN Director General, Elena Santiago Cid

Brussels, 12 August 2015

**Ref: ISO NWIP 17420 on Respiratory Protective Devices**

Dear Madam, Dear Sir,

On behalf of SME Safety a.i.s.l. ("SME Safety"), I would like to express a number of concerns about the ISO New Work Item Proposal ("NWIP") 17420 on Respiratory Protective Devices ("RPD") and, thus, request your negative vote for its on-going ballot.

SME Safety is the European association of Small and Medium sized Enterprises ("SMEs") that manufacture safety products.

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SMEs are concerned that ISO NWIP 17420 may trigger unnecessary prohibitive costs that will force small and medium sized manufacturers out of the market.

ISO NWIP 17420 is almost identical to the draft standard ISO CD 17420 (parts 1 and 2) that was developed by ISO in the course of 13 years and that was ultimately withdrawn because it failed to reach sufficient international consensus. In fact, ISO members rejected two different Committee Draft (CD) versions of ISO 17420. Following those negative votes, the proposers of ISO 17420 decided to bypass the cancellation of the standardization project (for not having reached the approval stage after a certain number of years, according to the ISO directives) by re-instating the same draft standard as a NWIP.

Despite some minor editorial changes, the proposed NWIP maintains all of the controversial features that caused the failure of the draft standard ISO CD 17420. Specifically:

(a) It introduces a new complicated classification system based on far too many Work Rates, and Protection Levels. This new system is supposed to replace the well-known and recognized current system for RPD classification, which is perfectly understood by all users in Europe and abroad. The introduction of a new, complicate classification will require all user companies to re-train their staff and, thus, create unnecessary risks for the health and safety of operators using RPD.

(b) It introduces a significant number of Special Applications, each of them with specific requirements. This will render all the basic requirements meaningless and there no longer will be simple and affordable products available. This will significantly and unnecessarily increase the costs for users.

(c) It raises the cost of certification for compliance with Directive 686/89/CE. This is due to the high number of tests, some of which require very costly machinery. Such costs are estimated approximately 10 times higher than the current certification costs and would force the majority of SMEs manufacturers of RPD to withdraw from the market.

Even more importantly, there is no evidence that the existing EN norms for RPD (developed by CEN) failed to secure product safety. They are considered top of the class safety standards worldwide and are increasingly accepted in several countries outside Europe. In fact, the incidence of accidents is steadily diminishing all over Europe since many years due to the successful use of EN standards by RPD manufacturers. Statistics demonstrate that accidents happen because of the misuse or non-use of RPDs, not for insufficient products' safety.

This demonstrates that the main argument used to promote the NWIP, i.e. improved safety, is just an excuse that is not supported by the facts.

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Most countries in Europe and worldwide already rejected the ISO 17420 approach. While this ISO project wasted experts' time and resources for 13 years, European manufactures in CEN TC79 are contributing to revise the existing EN standards on RPD with a view to include some acceptable elements from ISO 17420 and improve requirements. This is the best approach to promote competitiveness of European manufacturers and continue to ensure the highest safety for users.

We are thus requesting you to consider the arguments above and express a negative vote on NWIP 17420-1 & -2. We remain at your disposal, should you require any further clarification.

With best regards,

Diplom-Kaufmann Wolfgang Klein  
CEO of EKASTU Safety GmbH

Sebastiano Toffaletti  
SME Safety Secretary General

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