

**Miller, Diane M. (CDC/NIOSH/EID)**

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**From:** Glucksman, Daniel (CDC safetyequipment.org)  
**Sent:** Monday, April 20, 2009 4:35 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** 146 - (PPT) Action Planning  
**Attachments:** ISEA comments NIOSH docket146.doc

Dear Docket Officer:

Attached, please find the International Safety Equipment Association's comments for NIOSH Docket 146 – (PPT) Action Planning.

Please contact me at 703-525-1695 if there are any problems with this submission.

Sincerely,

- Daniel Glucksman

Daniel Glucksman  
Public Affairs Director  
International Safety Equipment Association  
1901 North Moore St., Suite 808  
Arlington, VA 22209  
703-525-1695 x19 \* 703-795-6064 (cell)  
ISEA Executive Summit, May 7-8, 2009

April 20, 2009

NIOSH Docket Office  
NIOSH Mailstop: C-34  
Robert A. Taft Lab.  
4676 Columbia Parkway  
Cincinnati, OH 45226

**DRAFT NIOSH Personal Protective Technology Program Plan to Implement the National Academies Evaluation Recommendations - Docket Number NIOSH-146**

The International Safety Equipment Association (ISEA) offers the following comments to the NIOSH Personal Protective Technologies Program Plan to Implement the National Academies Evaluation Recommendations.

ISEA is the trade association in the United States for companies that manufacture safety and personal protective equipment. ISEA member companies are world leaders in the design and manufacture of protective clothing and equipment used in factories, construction sites, hospitals and clinics, farms, schools, laboratories, emergency response and in the home.

Included in the association are products for head, eye and face, respiratory, hearing, hand and fall protection; high visibility apparel and headwear; environmental monitoring instruments; emergency eyewash and shower equipment; first aid kits, protective apparel; ergonomic protective equipment, respiratory protective escape devices and personal hydration systems.

ISEA's technical director, Janice Comer Bradley, CSP, was an official member of the Committee to Review the NIOSH Personal Protective Technology Program, which was established by the National Academies of Science, Institute of Medicine.

**Prioritize the Action Items**

At current and anticipated funding levels, it is unlikely that NIOSH will have the resources to adequately address all of the recommendations in the IOM report. Therefore it is essential that NIOSH prioritize the action steps based on its understanding and research findings of both hazards in the workplace and the ability of PPT to mitigate those hazards.

**Surveillance Must Come First**

Surveillance recommendations are found throughout the draft document, but principally in Section 5, where Issue 5.1 calls on NIOSH to "Establish a comprehensive surveillance program." ISEA recognizes that Action Step 1.1.1.5 is also related to surveillance as it seeks to understand how exposures, hazards and workplace practices may translate into PPT needs.

The most important function in this document is surveillance. This is because a complete surveillance program will help direct NIOSH time, funds and efforts to where they can do the most to make certain America's workers who need PPE will have it and use it when they need it. In a similar vein, the results of a robust NIOSH surveillance program will assist the nation's employers, state and federal governments and academic and research communities in allocating their funds and efforts toward reducing occupational injuries, illnesses and fatalities.

NIOSH must conduct substantial surveillance before certifying PPE and conducting evaluations of PPT and PPE ensembles and systems.

In addition to NIOSH's intention to focus on fit, comfort and usability, surveillance of PPE must also focus on use, maintenance, selection, availability, training, hazard communication, compliance and "supervisor enforcement." Research ISEA commissioned in 2001, 2002 and 2004 about PPE use found the principal reason workers did not wear PPE was that employers did not require or enforce usage. This held true for both public and private sector workers across nearly all types of PPE. In fact, the follow up study (conducted in 2004) found that the most common reason workers did not wear PPE more regularly was that "employers don't require/enforce usage." This was the primary or secondary reason for eight of the ten PPE types studied.

### **Field Evaluation of PPT**

Issue 5.2, "Conduct random field testing of PPE," is of great importance to a wide array of stakeholders. To address this issue, ISEA recommends NIOSH expands its federal partners to include import regulators, such as U.S. Customs and the Commerce Department's International Trade Administration. There is anecdotal evidence that some products fail to meet the standards to which they are marked. NIOSH could take a key leadership role in conducting this type of product surveillance.

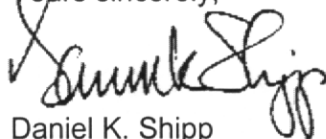
### **Comprehensive National Personnel Protective Technologies Program**

ISEA supports Recommendation 1, "Implement and Sustain a Comprehensive National Personal Protection Program," and encourages NIOSH to rely on industry partners such as trade associations, standards-setting organizations and other stake holders to coordinate the evaluation, testing and certification of PPT. This includes the harmonization and adoption, where appropriate, of global standards for PPE.

NIOSH's international reputation, including that of the NPPTL, is strong. NIOSH experience, presence and involvement globally should be able to provide the opportunity to influence and incorporate not only global respiratory protection standards, but also standards for other PPT such as protective apparel and gloves.

Standards on gloves provide an example of this type of exchange: CEN adopted a modified version of the ASTM permeation test method when the European standards were being established, because the ASTM standard was the first one to be promulgated as a consensus document and because significant data had been collected in developing that standard. ISEA took the same approach and adopted the CEN puncture resistance standard, because it was accepted and used in the industry. ISEA believes this type of international coordination should continue.

Yours sincerely,



Daniel K. Shipp  
President