A critical approach to ISO 17420

(All that glitters is not gold)

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I've been involved in standardisation work since I began my career at my family's company in 1975. At that time I joined CEN TC79. When the EN standards were over and only revisions were due from time to time, out of the blue came the ISO work and I joined TC94 SC15.

Very soon the philosophy of Human Factors came along with all its presumptions.

In other words all possible Respiratory Protective Devices or RPDs were to be covered by one document where requirements are based on the human physiology. No design restrictive requirements were to ever be considered. The simplicity of tests and the cost/time were not an issue, on the contrary if we only dared mentioning those aspects during meetings some delegates would have stepped away as cost is not an issue when safety is concerned. As a result we now have draft standards that propose a number of different tests with numbers of repeated testing and a number of precious machines with an expected increase of cost of testing and certification of 4 to 6 times, which will reverberate on actual market prices. Are those "improvements for the sake of safety" beneficial for all stakeholders?

The smaller manufacturers will not be affected much by the technical requirements, but by the cost of testing and certification. This will be particularly true in Europe where small and medium-sized enterprises (SME) account for over 80% of the total number of companies and the current legislation, in a certain way, enforces the use of the so called harmonised standards as a base of certification for CE marking. The Vienna Agreement between ISO and CEN may in fact lead to the automatic conversion of ISO into EN ISO and as such the standard will become applicable on the day of publication on the EU official Journal. This means that all previously approved RPDs have to be retested and recertified. Besides the cost of the operation which can reach several million Euros, the time needed for that testing is expected to be several years due to the congestion of Test Houses.

The marketplace will be affected in that the manufacturers that can first provide RPDs to the new ISO will be obviously be preferred in tenders to the detriment of those that are still queuing at the test houses.

Another aspect to consider is the need for all users to re-educate their staff on the new classification and rules. This also will take time and consume money and energy.

Users shall also bear the cost increase due to hyper testing and recertification.

The cost increase will be a further stimulus to users not to use RPD in risky environment with actually a reduction of safety instead of the sought increase.

Is it useful for the global society in a period of economic turbulence to spend so much on a project, noble in its aim, but that can bring so little or no advantage to anybody?