



## ISEA Position Statement on OSHA Issues

The International Safety Equipment Association (ISEA) is the association for companies that design, manufacture and sell/supply personal protective equipment for workers in the U.S. and around the world. ISEA has had a long, productive working relationship with OSHA throughout many administrations. We look forward to continuing this relationship.

ISEA has specific issues concerning OSHA regulations that affect the use of personal protective equipment (PPE) and the standards development process. We have expressed our views to the agency in comments, testimony at hearings, correspondence and contacts with agency personnel. We will continue to take an active role in representing the views of the PPE industry before OSHA.

We would like to take this opportunity to express our view on the larger issues of worker protection. ISEA believes that the time is right for a fundamental reexamination of occupational safety and health regulation. Work today is not the same as it was when OSHA was born in the early 70s, and worker health and safety needs to recognize advances in technology and changing demographics, as well as different management approaches and worker attitudes.

### **Adopt risk assessment and control**

Merely increasing the level of standards and enforcement activity at the agency is not the answer. ISEA adds its voice to those organizations calling for a fresh approach to occupational safety and health, where workplace risks are identified, assessed and reduced through management systems. These systems are in place in many other nations, and used extensively by major employers in the US.

### **Take the lead to develop a new consensus on OH&S**

Adopting this approach will require acceptance by a broad range of stakeholders – employers of all sizes, workers, unions, safety and health professionals and regulators – all of whom can make important contributions. ISEA suggests the time is right for the Administration to take the lead and convene a national conference to develop a new consensus on occupational safety and health appropriate for today's workplace and workers, leading to legislative changes where necessary.

### **Data/metrics and analysis**

Sound policy decision-making requires sound data. ISEA suggests that OSHA look beyond injury and illness reporting, which can lag behind incidents, and seek ways to use market-based indicators that might be better predictors of risk in the workplace. ISEA urges OSHA to use data that is available from NIOSH and other sources to gain a broader perspective of all injuries and illnesses incurred by the nation's workforce, and test its programs for their effect on improving safety and health.

### **Collaboration and cooperation**

OSHA and the Administration should make a high-level commitment to work with other federal agencies, including the Departments of Agriculture, Defense, Energy, Homeland Security, Justice, Transportation, the Environmental Protection Agency and the National Institute for Occupational Safety and Health (NIOSH). A systems approach to occupational health and safety should be broadly applicable to workers in those agencies and the industries and organizations they represent and regulate.

### **National consensus standards within OSHA standards**

It is notoriously difficult for OSHA to adopt updated national consensus standards that have been incorporated into OSHA standards. When OSHA regulations require employers to provide products that meet a certain national consensus standard, which is part of OSHA's regulatory structure, the process should be simpler. ISEA believes a method is needed where OSHA can adopt newly updated national consensus standards without the full examination of a notice and comment rulemaking.