Good Regulatory Practice

Standards And Conformity Assessment in Regulations

> Dan Roley Chair ISO/TC 127 2015-06-02

Outline of Presentation

- Industry Objectives and Process for Standards
- Conformity Assessment Process for the Construction and Mining Machines
- Good Regulatory Practices for the Use of Standards and Conformity Assessment in Regulations



ISO Standards

- Provide Information to Address Commercial and Safety Needs for Standardization:
 - Definitions and Terminology
 - Test Methods
 - Safety Performance Criteria
 - Conformity Assessment Process
- Developed by Global Experts
- Promote Global Harmonization

Objectives for Machine Standards

- Address All Safety Risks for Operators, Mechanics, and People Around Machines
- Define Performance Criteria, Not Design Specific, to Allow for Different Options and Improved Technology
- Define Reasonable and Realistic Performance Criteria, Adapted for Machine Applications
- Obtain Input From Machine Users, Health and Safety Experts, and Manufacturers
- Consider Sustainability for Standards
 - Social, Environment and Economical Factors
 - Support Sustainability for Machine Users

Value of ISO Safety Standards Define Acceptable Safety Levels

- To Quantify Safety Expectations of Health And Safety Organizations and Machine Users
- To Establish Acceptable Safety Levels for Machine Designers
- Establish a High Level of Safety To Allow Machines to Be Known as "Safe Machines", Not "Hazardous Machines"
- To Enable Manufacturers to Self Declare Conformity to Standards and Regulations
- Promote Single Global Requirements
 - Common National Standards
 - Single Global Regulatory Requirements

Conformity Assessment and Certification

- Best Practice Is To Allow Manufacturers To Do Their Own Conformity Assessment Testing, Defined in ISO 17050-1 as Supplier's Declaration of Conformity (SDoc)
- ISO/TC 127 Standards Define Test Methods and Performance Criteria That Manufacturers Can Use For Conformity Assessment Testing and Certification
- Manufacturers Insure that Machines Comply With Standards and Regulations During the Development Process, Including the Replacement Parts for Machine Repairs
- Manufacturers Certify Machine Compliance

Conformity Assessment and Certification

- Some Countries Require Third Party Certification Because Manufacturers:
 - Do Not Have Expertise to Do SDoC
 - Do Not Have Test Facilities for SDoC
- Third Party Conformity Assessment and Certification Is Appropriate For These Countries
- The Long Term Goal Is SDoC, But Third Party Conformity Assessment and Certification May Be Necessary For the Short Term
- Testing Done By Manufacturers Should Be Accepted By the Third Party, If Properly Done
- No Additional Testing and Certification for Original Machine Replacement Parts Is Needed

Conformity Assessment Testing

- Conformity Assessment Testing Already Completed By the Manufacturer Should Be Accepted If the Manufacturer Has the Following:
 - A Quality Plan That Is at Least Equivalent to ISO 9000
 - A Documented Conformity Assessment Process
 - A Conformity Assessment Group/Person to Manage the Conformity Assessment
 - Access to Conformity Assessment Facilities (Manufacturers Facility or Independent Labs)
 - Documentation of Test Results

Safety Regulations Using ISO Standards

- Best Practice Is To Define The General Machine Safety Risks/Requirements In National Or Regional Regulations
 - EU Machine Safety Directive Is Good Example
 - USA Regulations Address General Safety
- Allow Regulations To Reference Or Use The National Or Regional Standards As The Technical Requirements For Safety
 - Adopt The ISO/TC 127 Standards As National Or Regional Standards (ISO 20474)
 - Allow Some Of The ISO Requirements in ISO 20474 To Be Voluntary In The Short Term for Developing Countries

Summary

ISO Standards Can Be Used As the Basis for National Standards

- A High Level of Reasonable and Realistic Safety Requirements Are Already Developed by Global Experts
- Save Time and Resources by Using ISO Standards
- ISO Standards Can Be Used as the Technical Requirements for National Regulations to Promote Global Harmonization
- Helps Local Manufacturers Export Their Machines
- Benefits Local Machine Users with Machines that Have Higher Safety Standards