



AMERICAN SOCIETY OF SAFETY PROFESSIONALS

December 20, 2019

American National Standards Institute, ANSI
Attn: Ms. Anne Caldas, Director
25 West 43rd Street, 4th floor
New York, NY 10036

ASSP TECHNICAL COMMENT **Proposed Revision to the ANSI Essential Requirements**

Dear Ms. Caldas:

ASSP was apprised of the proposed changes to the *Essential Requirements Document* now open for comment. ASSP would like to comment on two of the proposed changes.

We would like to offer the following edit to this proposed language:

The affiliation of a consensus body member refers to the entity that the consensus body member represents (which may or may not be that person's employer). If the consensus body member is serving in an individual capacity, then the name of the individual, ~~that person's employer (if employed), sponsor (if other than employer)~~ and interest category shall be made available. Contact information is not required.

We do need some clarification. If a person is serving in an individual capacity, then how can that person have a sponsor to begin with if they are representing themselves? In addition, does this statement mean that an individual member's employer would need to be disclosed in the roster of a published standard or in an official listing of committee members? Our interpretation of the requirements above is "yes" since it specifically notes the person's employer shall be disclosed.



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ASSP suggests that requiring disclosure of employer information for individual members is not appropriate. During our review of this proposal, several participating individuals suggested this proposed change would discourage participation. The view is that individual members could potentially have to defend/justify personal activities to their employers. The impact could limit the participation of many highly qualified individuals, which is not consistent with the goals of the *ANSI Essential Requirements*.

Changes to an individual's employment status creates other potential issues, forcing standards developing organizations to track employment on a regular basis. By definition, individuals represent themselves, and the identity of their employer should not be relevant.

Below are several specific examples ASSP has experienced, which supports our contention that this additional requirement is not appropriate.

- We have an individual member on our Z10 Committee who recently lost his job. He applied to be on the committee as an individual, is now looking for a safety job, and is currently working as a driver for a limousine company. We fail to see why his current employment as a limousine driver has been released.
- We have an individual member on one of our Z590 Canvass Lists. This person's employer specifically notes employees are not permitted to list their employment status for personal activities. Under the proposed requirement by ANSI, this individual would not be able to participate.
- ANSI should recall that during appeals on the A10.40 Ergonomics Standard, committee members were targets of a letter writing campaign by unresolved objectors. In addition, several A10.40 Subgroup members were on the working group as individuals. We had several attempts from outside parties seeking to identify subgroup members' employers. The intent was apparently to send threatening letters to their employers in retaliation for the individual's personal work on the standard. Following requests for such information, ASSP would not identify the employers of individual subgroup members under advisement of counsel.



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ASSP suggests that our recommended edit be considered and included. We would be interested in learning why ANSI believes this change to the *Essential Requirements* is warranted.

In addition, we are interested in learning more about the rationale to remove professional societies and trade associations from Note #3. We use these interest categories in our standards, and these organizations provide some of our most knowledgeable and committed standards participants. We understand from the language that we are not prohibited from using these categories, but we would be interested in learning the rationale for their removal from the note.

#3. Further interest categories that may be used to categorize directly and materially affected persons consist of, but are not limited to, the following: a) Consumer; b) Directly affected public; c) Distributor and retailer; d) Industrial/commercial; e) Insurance; f) Labor; g) Manufacturer; ~~h) Professional society~~; I) Regulatory agency; j) Testing laboratory; ~~k) Trade association.~~

If we can be of any additional assistance or ANSI needs more information, please feel free to contact the Society.

Respectfully Submitted,

Timothy R. Fisher, CSP, CPEA, CHMM, CAE, CST, ARM
Director, Standards Development and Technical Services