

## Ally Kupferberg

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**From:** Anne Caldas  
**Sent:** Wednesday, March 17, 2021 3:39 PM  
**To:** Anne Caldas  
**Subject:** Response to public comments - Proposed revisions to the ANSI Essential Requirements - CSA Group  
**Attachments:** ExSC\_025\_2021\_ER TG Report from 2019.pdf; ExSC\_017\_2019\_030921.pdf; ExSC\_017Q\_2019\_CSA.pdf

Greetings –

We hope that you are well.

Thank you for submitting the attached public comments in response to proposed revisions to the ANSI Essential Requirements ([www.ansi.org/essentialrequirements](http://www.ansi.org/essentialrequirements)) announced in Standards Action in December 2019. Background on the original proposed revision is included in the attached report (ExSC\_025\_2021). The ExSC has considered all public comments and as a result, edited the original proposed revision, now attached here in its final edited form (ExSC\_017). This edited version was approved by the ANSI ExSC in February 2021 and will be submitted to the Executive Committee of the ANSI Board of Directors for final approval in March 2021 for incorporation into the 2022 edition of the *ANSI Essential Requirements*.

Please also note that consistent with recommendations in the attached ExSC TG Report, ANSI has updated our website to provide easy access to information about the American National Standards (ANS) process and how to participate in it. Please visit the new ANS pages, including these: <https://www.ansi.org/american-national-standards/ans-introduction/overview#introduction> , <https://www.ansi.org/american-national-standards/info-for-the-general-public/general-public> and <https://www.ansi.org/american-national-standards/info-for-standards-developers/standards-developers> .

Responses to your comments and suggestions are presented here by section:

### **Original Lines 7-18: Section 2.1 – Openness**

- Line 18: add "upon request" – incorporated.

### **Original Lines 25-71: 2.3 Balance**

- Line 35: replace "shall normally" with "typically" – incorporated.
- Line 37: delete sentences: "In cases where a consensus body member receives funding..." The ExSC disagrees that "disclosure of funding is not relevant to the determination of voting interest classification" and did not accept this comment.

### **Original Footnote 3 – Interest Category examples**

- FN 3: revert to original text and do not delete "trade association" or "professional society". With respect to the deletions from the optional list of interest categories listed in FN3, the ExSC views a "professional society" or "trade association" as a general membership category rather than the interest category they represent on a consensus body. For example, a trade association is presumed to represent the industry/stakeholders for which the trade association exists, so an industry trade association is appropriately classified as "industry".

### **Original Lines 73-88: 1.5 & 2.5 Notification of Standards Development**

- Lines 75 and 81: revert to original text, but add "and deliberation". The ExSC has agreed that some provisions should highlight due process requirements for emphasis; this suggestion was not accepted. Reference to “deliberation” was retained.

### **Original Lines 81-105: Section 2.5.1 PINS**

- Line 99: Do not include the additional PINS requirement. The ExSC sees value in providing more information upfront and in time for the public to suggest interest categories/stakeholders that are potentially relevant and should be engaged. This suggestion was not accepted.
- Line 102: change the new PINS requirement to apply only in the case of "significant concerns". The ExSC sees value in providing more information upfront and in time for the public to become engaged or better understand the proposed project. This suggestion was not accepted.

**Original Lines 107-156: Appeals**

- Line 137 Appeals: suggests deleting "which must be implemented promptly and with decisions made expeditiously". This is an expectation that is worth highlighting outside of the applicable Operating Procedures. See the updated revision attached.

Again, thank you for your interest and your comments.

Sincerely,  
Anne

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