

MAY UPDATE

Provision of digital User Instructions for EN Certified PPE - the current facts

Heading in the right direction...

The Facts about the current change to Digital User Instruction for EN certified PPE

There has been much comment in recent weeks regarding the removal of paper User Instructions from EN certified PPE, to be replaced by access to digital versions - a move many have been pushing for some time. The benefits are self-evident.

Millions of items of EN certified PPE are supplied throughout Europe and the world every year, each containing a printed copy of User Instructions, often in multiple languages. So, ceasing the production of paper versions will reduce the carbon footprint of the industry considerably and almost overnight. It seems a no-brainer.

And yet, there are also good reasons for maintaining paper versions. They do contain important information for users, and immediate access to the internet is not always possible (on many manufacturing sites, for example, mobile phones are not allowed in critical areas, so paper access is the only immediate access). However there is a clear movement towards digital User Instructions, with at least one manufacturer announcing an immediate switch, even though the change has not yet been ratified by CE authorities or by all EU member countries, with some continuing to require paper versions. Lakeland is as keen to make this move as anyone, but our understanding is that whilst under discussion, the change is not yet finally approved.

So, here are the current facts as confirmed by the British Safety Industry Federation.

1. In fact, the original PPE regulation never did demand that paper User Instructions must be made available. It simply required that User Instructions should be available with every unit of PPE sold.
2. However, "The Blue Book" – the guidance designed to help manufacturers understand the regulation did specifically require paper User Instructions. This was revised recently, and that requirement removed.
3. The certification authorities have, however, requested that manufacturers wait until all discussions are concluded and confirmation officially published before any changes are made.
4. Individual countries must each approve of the change before it is finalized. In fact, several member countries, including France and Switzerland, have not agreed to this change, and for the time being are continuing to require that all PPE contains a paper copy of the User Instructions. The consequence right now, therefore, for any manufacturer that proceeds with this change and removes paper User Instructions is that their products will not be in compliance with the PPE regulation, and especially those countries still requiring paper User Instructions may prevent those products being placed on the market.

Clearly then, whilst quite rightly the direction of travel is towards the removal of paper User Instructions, replacing them with digital versions, the switch has not yet been fully confirmed. Lakeland is as keen as anyone to make this change, but the fact is, the decision has not yet been ratified and approved by all EU member countries. Until it is, we will hold the change and continue to ensure our products maintain full compliance with the regulation. Once the decision is finalized and published, we will quickly move to make the switch and reduce the carbon footprint of our protective clothing.

