



HB Protective Wear GmbH & Co. KG | Maischeider Straße 19 | 56584 Thalhausen

**Position paper ISO/DIS 11612.2
ISO/TC 94/SC 13/WG 2 N 365
NA 075-05-02 AA N1536**

To whom it may concern,

The standard EN ISO 11612 has been in revision since 2022, and the second DIS has now been published to comments. In the draft ISO/DIS 11612.2:2024(en) there has been changes, on which we would like to draw your attention to.

The scope of EN ISO 11612 is "wide range of end users" and the PPE has "limited flame spread" properties along other heat protection characteristics. One of the changes in the draft is a new requirement (Clause 6.3.4.1.) to test the main closure with a direct exposure to a flame, whereas until now it has been sufficient to test the closures and accessories "as they are" in the product, covered or exposed, depending on the design. However, to our knowledge, there has been no incidents or an at least no increase in accidents where an ISO 11612 garment or its fasteners have been the cause. Any change to an existing standard should be based on evidence and need, not just on feelings or, in the worst case, on pursuing financial gains.

The requirement to test the main closures with a direct flame exposure is not consistent with other heat/flame protection standards, e.g. IEC 61482-2 (arc protection class APC, ELIM) or firefighters' clothing (EN 469, EN 16689). In these cases, "as in garment" testing is required and is considered sufficient. It could be argued that the added requirement ISO 11612, 6.3.4.1. is an over-exaggeration compared to the scope of these standards, especially due to its wide scope and general flame protection character.

Clause 6.3.4.1 states that "*The purpose of testing the closure system directly is to ensure that when the closure system is exposed, it still allows a rapid removal of the garment after an emergency.*"

When the PPE is worn correctly (zips, buttons, flaps closed) - the fasteners must work as they are in the garment, covered or exposed. In the event of an accident, only PPE that is worn correctly *can* work. By assuming that the PPE is not being worn correctly, one calls into question the complete system. It would be a significant shift in the current approach to require a standard consider scenarios where the garment is not worn properly. Furthermore, the number of such potential scenarios would be endless, hence posing an impossible task for standardization. The manufacturer's instructions are there for exactly this reason: manufacturers are obliged by both ISO 13688 and the PPE Regulation (EU) 2016/425 to give instructions and warnings of possible limitations and risks, as well as information on how the garment is used safely and correctly. And we must rely on the wearer following the instructions.

Adding the requirement increases the testing burden unnecessarily and the consequences of this change are not foreseeable. All accessories must currently comply with the fire-retardant requirements set out in ISO 11612:2015. Our inquiries suggest that the proposed change presents a challenge for existing products. In the worst-case scenario, we have no alternative accessory for zippers, as there is currently only one supplier capable of meeting the new testing requirement.

This leads to our proposal not to change the requirement and to delete the Clause 6.3.2.4. completely as superfluous. Testing "as in garment" continues to be sufficient to test the functionality of the closures.

We urge all stakeholders to consider the above points when forming their final decision and position on the 2nd ISO/DIS 11612.2 and to comment and vote against the draft accordingly.

Thalhausen, 16.12.2024
HB Protective Wear GmbH & Co.KG