



WAHSA PGN06

Practical Guidance Note 06

GUIDANCE ON CE MARKING

A series of informative notes for all industries involved with work at height or rescue.

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INTRODUCTION

This guidance note gives guidance to users and specifiers on why some equipment is CE Marked whilst other equipment is not.

Personal Fall Protection Equipment (PFPE) used within the European Union including the UK must meet basic health and safety requirements of the Personal Protective Equipment Regulations 2002.

To demonstrate its compliance with the regulations, manufacturers can submit equipment for independent type testing to a harmonised standard via a third party notified body. Harmonised standards exist for most items of PFPE and set out the minimum expected requirements in terms of the equipment's performance, construction, instructions and compatibility with other PFPE.

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01 WHAT IS A HARMONISED STANDARD AND WHEN ARE THEY USED?

A harmonised standard is a CE Standard that has been approved and adopted by all European countries. If a standard is not approved and adopted by all countries, it is regarded as not being harmonised. Standard that are not harmonised should be used to demonstrate compliance and validate the performance of equipment unless a more suitable method is available.

Using a harmonised standard remains the most popular method of demonstrating compliance, but it is voluntary. Alternatively, the manufacturer can demonstrate the equipment is safe to use by producing documentation (a Technical Specification) supported by a notified body.

02 CE MARKING PERSONAL FALL PROTECTION EQUIPMENT

Upon successful testing and verification by a notified body, the manufacturer is provided with an EC Type Examination and is required to place a CE Mark along with the identification number of the notified body on the equipment. Additionally, the equipment must be supplied with an EC Declaration of Conformity (EC DoC), proving that the equipment meets the requirements of the regulation.

As an example, if a manufacturer wants to demonstrate that an energy absorbing lanyard meets the basic health and safety requirements of the PPE Regulations, the following harmonised standards are available:

- BS EN 354: 2010 *Personal fall protection equipment – Lanyards.*
- BS EN 355: 2002 *Personal protective equipment against falls from a height – Energy Absorbers.*

Depending on the construction / format of the energy absorbing lanyard, either BS EN 355: 2002 could be used in isolation, or BS EN 354: 2010 and BS EN 355: 2002 used in conjunction. BS EN 355: 2002 would be sufficient for an energy absorbing lanyard featuring an integrated lanyard, whereas a separate lanyard and energy absorber would need to use both standards.

03 WHY IS SOME PFPE EQUIPMENT NOT CE MARKED?

There are a number of circumstances where a manufacturer may demonstrate an item of equipment's compliance via a Technical Specification rather than certification against a Harmonised Standard. These reasons include:

- the equipment may be so unique or innovative that no Harmonised Standard exists
- the equipment meets a Standard that is not harmonised
- the equipment may only comply to parts of a standard or elements of a number of standards
- the Standard has been withdrawn and no more suitable Standard exists

For example, BS EN 795: 2012 *Personal fall protection equipment – Anchor devices* covers the test requirements of anchor devices such as slings, eye bolts and horizontal line systems. However, the European Commission took the view that devices not personally issued, i.e. fixed to a structure, are not considered to be Personal Protective Equipment and therefore, cannot be CE Marked under the PPE Regulations / directive. As a result, there can be legitimate anchors in use within the UK that do not hold a CE Mark. However, the device should ideally have been tested by a notified body via the Technical Specification route.

Another example where the lack of a Harmonised Standard raises questions regarding an item of equipment's suitability can be encountered when selecting a descender as part of a rescue system. BS EN 341: 2011 *Personal fall protection equipment – Descender devices for rescue* compliance is often requested by customers / users, but the Standard has not been harmonised by the European Commission as their interpretation of the PPE Regulations does not cover rescue equipment. As a result, such devices cannot be CE Marked against this Standard and manufacturers must find an alternative to demonstrate the equipment's compliance, such as BS EN 12841: 2006 *Personal fall protection equipment – Rope access systems – Rope adjustment devices*.