

Brussels, 10th October 2014

**Position paper on the Formal Objection raised by Germany
against the standard EN ISO 20344**

The European Confederation of the Footwear Industry (CEC) does not agree with the formal objection raised by Germany against the standard EN ISO 201244 (revision December 2011).

Instead we fully endorse the position of CEN/TC 161/WG and WG2 issued in September 2014 in this regard, which has also been the basis for the positions of the Italian, Portuguese and German Footwear Associations, the Spanish and French footwear technological centers (INESCOP and CTC), and in general of all the footwear relevant stakeholders in Europe.

In the past, the standard (EN ISO 20345:2004) proved not to be sufficient to guarantee that safety shoes with inserts made from textile materials provided a real protection. However, with the new version of the standards (EN ISO 20345:2011 and EN ISO 20344: 2011) that safety problem was solved by introducing new requirements and specific test methods.

The objection from Germany indicating that the actual anti-penetration textile used in safety shoes does not protect adequately the worker from the risk of penetration of the foot sole, and that the new tests foreseen in the standard EN ISO 20344:2011 are not enough to prove the safety of the product, does not have any valid argumentation. When objecting, Germany seems to forget that such standard was revised in December 2011 specifically with the objective of increasing the safety of workers, and facing the previous lack of knowledge about test methods and requirements. Consequently, the 2011 standard's revision does guarantee that these insoles provide protection and that only safe products are placed on the markets.

The German Objection is based on statistical data that indicate how accidents are rising due to feet sole's penetration, but such data refers to the period of 2000-2005, and it is therefore obsolete. Indeed the German report dated 15th December 2010 (PPE 14-2-13) takes into account footwear and inserts that differ from the ones placed on the market today, after the implementation of the standard EN ISO 20344:2011. The data cannot therefore adequately represent the current situation in terms of accidents. More recent studies, carried out in various Member States, indicate that accidents are instead reducing and the accident rate is actually very low. Some concrete examples in the EU have been identified by:

- A survey carried out by APICCAPS (the Portuguese Association of Footwear and Leather goods Manufacturers) and the CTCP (the Portuguese footwear research and training institute) on complaints and accidents occurred in 2012 and 2013 and associated with inserts made from textile. The study indicates an accident rate of 0.001%. The study included among others, the two largest manufacturers of safety footwear in Portugal.

- The “Bundesverband der Schuh und Lederwareindustrie e.V. in Deutschland” (the Federal Association of German Footwear and Leather Goods industry) also carried out a survey on accidents figures in 2013, which result gave the same accident rate: 0,001%. This survey included as well, among others, the three largest manufacturers of safety footwear in Germany.
- The Spanish National Institute of Security and Hygiene at work (INSHT) prepared statistics from data published by the Ministry of Employment and Social Security relative to accidents caused by contact with sharp or pointed material agents between 2011 and 2013. The numbers indicated that the problems encountered with the textile inserts had decreased after the revision of the standards that imposed stricter requirements, and these problems have now almost disappeared.

In addition to illustrate a clear decrease of the total number of accidents, statistics have also confirmed that the use of textile inserts in safety footwear is increasingly growing. Several reasons explain this textile inserts increase:

- Some workplaces require footwear that is 100% free of metal materials, i.e. explosive atmospheres;
- The ergonomic characteristics and the comfort when moving in kneeling and crouching positions are significantly higher;
- The thermal characteristics permit a better insulation in hot and cold environments. The textile inserts better absorb sweat and, in winter boots, prevent a faster cooling down of the footwear;
- The feet area is 100% protected. On the contrary in safety footwear with metal inserts, some areas of the edge are not protected: the distance between the feather edge of the last margin and the edge of the insert reaches up to 6 mm to 6.5 mm and in the heel region up to 15 mm to 17 mm;
- Because of the advantages in the comfort, some users prefer to wear those shoes even if the risk analysis would not require them to wear S3 safety footwear.

Despite the increase number of textile inserts, we agree that metallic and textile inserts are not interchangeable, and both have their limitations. The characteristics of the two are very different and so are the related performances. The right footwear should be chosen for the right situation, and for that, an accurate risk assessment is the key for the correct selection and appropriate use.

In order to address the remaining risks that apply to thinner nails in the period running up to the publication of a new test method and new requirements, manufacturers of safety footwear are recommended to clearly indicate the topic in the product information: *“The penetration resistance of this footwear has been measured in the laboratory using a truncated nail of diameter 4,5 mm and a force of 1100 N. Higher forces or nails of smaller diameter will increase the risk of penetration occurring. In such circumstances alternative preventative measures should be considered.”*

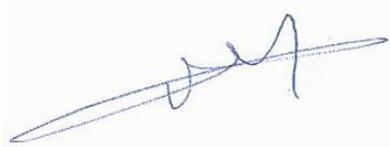
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A lot of work on standardization, studies and tests has been done, and continues to be done by the nationals and European Working Committees with a view to securing that only safe products are placed on the market. Manufacturers have modified and certified their products according to the new standard EN ISO 20344:2011, bearing all the necessary costs. This standard is a binding reference for all other standards of CEN/TC 161, and thus the basis for certification of professional footwear in Europe.

If such standard is declared invalid as requested by Germany, there will be a significant gap in the certification of protective equipment and would call into question every certificate issued so far. Clearly, the measure would be excessive, in particular because there is a lack of evidence of an increase in accidents caused by textile inserts since the publication of this standard. This without forgetting that market control would be highly affected by the invalidation of the standard, since the bodies in charge of this task would lack objective tools to support their controls.

For all the reasons mentioned above, the European Confederation of the Footwear Industry considers that the formal objection presented by Germany cannot be accepted, as it would create a big damage to the sector without any technical arguments.



Jean-Pierre Renaudin
President

*The **European Confederation of the Footwear Industry** (CEC) gathers the footwear national associations and federations of the European Union. CEC's overall objectives are to encourage the development of an environment in which European footwear manufacturing can be successful, and to reinforce the competitiveness of the whole supply chain through common initiatives. Current Members represent approximately the 87% of the European manufacturing. Their affiliates are 99% SMEs and directly employ more than 220.000 persons. From 2009 to 2013, EU footwear exports to third countries have increased by 48% in pairs and by 74% in value.*