

**SME SAFETY POSITION  
ON VALIDITY OF TEST REPORTS  
FOR THE ISSUING OF EU TYPE-EXAMINATION CERTIFICATES**

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The European Coordination of Notified Bodies in the field of Personal Protective Equipment has proposed 57 new 'Recommendations for Use' (RfU) sheets in support of the PPE Regulation (EU) 2016/425. RfU are technical sheets for coordination of a common position of the Notified Bodies on PPE regulatory issues. Upon approval by the PPE Working Group, RfUs are published on the European Commission website.

In preparation to the upcoming PPE Working Group, SME Safety would like to express comments on the draft [RfU PPE-R/00.057](#). Such RfU is about the validity duration of test reports. The document aims at clarifying the maximum time from the date of issuing of a test report for its use in a new EU type-examination certificate, proposing the following solution:

<b>Question:</b>
Which would be the maximum time from date of issue of a test report to be useful for a new EU type-examination?
<b>Solution:</b>
No more than five years

SME Safety is seriously concerned that limiting the duration of tests validity will cause unnecessary costs for small manufacturers, while not having an actual positive impact on the safety of products. It should be noted that the PPE Regulation introduced a limit of 5 years to the validity of EU type-examination certificates. However, this does not in any way affect the limit of validity of test reports, whose maximum time of validity is not defined by the PPE Regulation. It is clear that if the product has not been changed by the manufacturer and if the relevant requirements in the applicable standards have not changed, test reports shall remain valid.

Furthermore, SME Safety notes that this proposal does not consider the agreement on the minimum time for validity of test reports that was reached by the majority of Notified Bodies and made explicit in RfU 30-003 r1 under the framework of the PPE Directive (see Annex).

That is the reason why SME Safety proposes the following wording for PPE-R/00.057:

**Question:**

Which would be the maximum time from date of issue of a test report to be useful for a new EU type-examination?

**Solution:**


A maximum time limit for the validity of a test report cannot be defined. Test reports are valid for at least 5 years from the date of their issuing. Following this 5 years period, test reports can only be deemed invalid if the manufacturer has modified the approved type or the reference standards have changed in a way that they don't meet any longer the essential health and safety requirements.

SME Safety believes that this proposal reflects the spirit of the PPE Regulation to avoid unnecessary additional tests or examinations which would have the only effect of creating unnecessary administrative burden and increasing costs of certification.

## About SME Safety

SME Safety is the European association of Small and Medium-sized Enterprises (SMEs) that manufacture safety products. SME Safety is an interest group active in the EU policy and standardisation debate and promotes the interests of European SMEs in the safety sector.

SME Safety is a member of Small Business Standards (SBS), the European Association for SMEs in Standardisation recognised by Regulation 1025/2012. More information: [www.sme-safety.eu](http://www.sme-safety.eu).

		<b>CO-ORDINATION OF NOTIFIED BODIES</b> <b>PPE-Directive 89/686/EEC + amendments</b> <b>RECOMMENDATION FOR USE</b>		CNB/P/05.30-003 Revision 01 Language: E <b>30-003 r1</b>	
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Question related to :			EN/prEN :		Other :
Annex :		Article :		Clause :	
Key words : Validity test reports					
Question :  The acceptance of test reports for EC Type-Examination is treated differently by Notified Bodies, is it possible to come to a consensus that all NB's use the same approach ?					
Recommended solution :  Yes.  The acceptance of test reports for EC Type-Examination is the responsibility of the Notified Body. Article 10 of the PPE Directive states: <i>"It shall conduct the necessary examinations and tests to establish the conformity of the model..."</i>  In cases where the Notified Body accepts test reports only until a certain date, such date should be not less than 5 years.  The Notified Body may also require verification testing of materials.					
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(1) Essential safety requirement  
 (2) HC = horizontal committee

(3) N° of CEN/TC (Secretary & Chairman)  
 (4) EEC Standing Committee 89/392

(5) To be specified