



CO-ORDINATION OF NOTIFIED BODIES  
PPE Regulation 2016/425

PPE-R/01.001  
Version 1

RECOMMENDATION FOR USE

Number of pages: 1		Approval stage :	Approved on :
Origin : Vertical Group 1		<input checked="" type="checkbox"/> Vertical Group	21.04.2018
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		<input type="checkbox"/> EU PPE Working Group	
Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 397:1995 (+A1) & EN 397:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 6.11.2	
Key words: Industrial helmet, lateral deformation test, test procedure			
Question: In the case of helmets which include localized projections from the shell, e.g. rivets, is it permissible to use "bridging elements" so that the load is not applied directly to the projections?  <i>Background: differing results in the lateral deformation test of one industrial helmet type had been reported for UTAC and BSI. Different location of the loading plates on the sides of the helmets turned out to be the reason for the discrepancy. Whereas UTAC located the loading plates directly on the shell, notwithstanding any localized projections such as rivets, BSI bridged the projections on the shell by means of wooden elements.</i>			
Solution: No.  The test procedure in which the loading plates are located on the helmet itself (without any bridging elements) is the relevant one for the lateral deformation test. The formulation of chapter 6.11.2 in EN 397 does not allow any other interpretation.			



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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 812:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 4.7	
Key words: Industrial bump caps, ventilation			
Question: Products may be designed with 'cut-outs' that extend upwards from the lower edge of the shell, such as those found at the rear of a bump cap designed with the appearance of a baseball cap or those designed to permit flexing of the shell for comfort or to accommodate different head sizes.  Should such cut-out features be considered as holes for ventilation purposes?			
Solution: No.			



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		<input type="checkbox"/> EU PPE Working Group	
Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 1384:1996 & EN1384:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause:	
Key words: Helmets for equestrian activities, peak, deflection			
Question: For the purpose of testing peak deflection, what should be considered a peak, because the definitions given are not clear?			
This sheet relates to the following standards:  EN 1384:1996 (+A1) & EN 1384 : 2012      clauses 3.10, 5.5 & 6.8			
Solution: Limited protection to the eyes may be provided by an extension forward from the that part of the helmet which covers the head directly from above. Depending upon the construction of the helmet, such an extension may be considered to be, or not to be, a peak. It may be integral with, or detachable by the wearer from, the helmet. In the case of helmets whose construction incorporates a shell fitted with protective padding, the extension is considered to be a peak if it is not made from the same material as the protective padding (that is, it is made from the same material of the shell). If the extension is made from the same material as the protective padding, it is considered not to be a peak. In the case of helmets whose construction does not incorporate a shell (that is the helmet is predominantly made from shock absorbing material), the extension is considered not to be a peak if it is integral with the part of the helmet which covers the head directly from above.			



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Question related to  PPE Regulation

EN/prEN: Various

Other:

Article:

Annex:

Clause:

Key words:

Kerbstone anvil

Question:

How shall a test be performed using the kerbstone anvil?

*The following standards are affected:*

*EN 966 : 1996 (+A1/A2) & EN 966 : 2012*

*clause 7.2.3*

*EN 1077 : 2007*

*clause 5.5 (refers to EN 13087-2 : 2000 cl. 5.3)*

*EN 1078 : 1997 (+A1) & EN 1078 : 2012*

*clause 5.4*

*EN 1080 : 1997 (+A1) & EN 1080 : 2013*

*clause 5.4*

*EN 13087-2 : 2000 (+A1) & EN 13087-2 : 2012*

*clause 5.3*

*EN 13781 : 2001 & EN 13781 : 2012*

*clause 5.4*

Solution:

The kerbstone anvil simulates the pavement edge; this means it has to be considered of endless length.

For practical and technical reasons these anvils have a limited length as specified in the standards.

Test shall be performed in such a way that the edges of the anvil, as far as possible, do not affect the results (for example by directly contacting, during positioning, the headform).



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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: All	<input type="checkbox"/> Other:
Article:	Annex:	Clause:	
Key words: Test method standards			
Question: If a specific product standard does not cover all test specifications and possible interpretations and there is no direct reference to test method standards (EN13087 series) how should the Test Laboratory proceed in performing tests and verification?			
Solution: When test method is not fully described or clarified in the appropriate specific product standard and no reference to the test method standards are in the specific one, the Test Laboratory should refer to the existing appropriate test method standards (i.e. EN13087 series) to conduct tests.  However, if there is a difference between the procedure/equipment in the product standard and that in the test method standard, the method from the product standard shall take precedent.  Test Laboratories are encouraged to highlight individual situations in which information is missing from the product standard so that a separate Recommendation for Use sheet can be raised for each occurrence.			



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Question related to  PPE Regulation  EN/prEN: EN 443 : 2008  Other:

Article: Annex: Clause: 5.7

Key words:  
Retention system effectiveness, Pre-requisites

Question:  
EN 13087-5 : 2000 clause 4 point f) requires the performance standard to specify the "direction of application of the force". EN 443 : 2008 clause 5.7 does not do this, so how shall the force be applied?

Solution:  
The force shall be applied both to the front and rear in two separate tests, although the order is not critical.  
  
The single sample specified by EN 443 : 2008 table B.1. shall be used for both tests.  
  
The single sample must satisfy the requirements for both the front and rear tests in order that the model be considered acceptable.



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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 443 : 2008	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 5.4, 5.5	
Key words: Shock absorption, Resistance to penetration			
Question: In the case of helmets fitted or supplied with face protectors that are covered by the definitions of clause 3.18 "integral additional protective function" or clause 3.19 "non-integral protective functions", how should the face protector be positioned when testing to clause 4.2 "Shock absorption" or 4.3 "Resistance to penetration"?			
Solution: The face protector shall be placed in its "in-use" position.			



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Question related to <input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: Various	<input type="checkbox"/> Other:
Article:	Annex:	Clause:
Key words: Secondary impacts		
Question: Shall the results for secondary impacts, i.e. after bounce, be considered when making assessment?		
Solution: No.  Values obtained during secondary impacts, i.e. after bounce, shall be disregarded.		





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Question related to  PPE Regulation  EN/prEN: EN 1078:1997 & 2012  Other:

Article: Annex: Clause: 4.6.3

Key words:  
Retention system, Fastening device

Question:  
In cases where the design of the product ensures that the buckle does not sit on the jawbone, is it essential that the fastening device is capable of adjustment?

Solution:  
No.

The primary purpose of this requirement is to ensure that the device does not sit on the jawbone.

Buckles positioned under the chin or around the jaw area would need to be moveable. Buckles positioned high on the side of the face that would not sit on the jawbone would not need to be moveable.



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Question related to  PPE Regulation

EN/prEN: Various

Other:

Article:

Annex:

Clause:

Key words:

Penetration test block, radius

Question:

What is the correct radius for the penetration test block?

Solution:

The radius should be 65mm, with a tolerance of  $\pm 1$ mm.

Reason:

EN 1384 : 1996 (+A1), EN 1384 : 2012, EN 12492 : 2000 (+A1), EN 12492 : 2012 and EN 13087-3 : 2000 are standards that include specifications for a penetration test block.

(EN 13087-3 is referred to by EN 443 : 2008, EN 1077 : 2007, EN 14052 : 2005 & EN 14052 : 2012)

EN 1384 : 1996 (+A1) and EN 1384 : 2012 clause 6.5.2 specify a block with a radius of 65mm. They do not include a figure for the block, nor do they specify a diameter.

EN 12492 : 2000 (+A1) & EN 12492 : 2012 include a figure showing a block of radius 66.5mm with a diameter of 165mm. These dimensions are incompatible.

EN 13087-3 : 2000 figure 1 shows the radius of the test block as 65mm, but the diameter as 160mm. These dimensions are incompatible.

Either of the diameters stated would give a circumference larger than 495mm. The radius of 65mm would give a diameter that would permit the relevant sizes of helmet to be fitted and allow movement to test different positions.



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Question related to  PPE Regulation  EN/prEN: EN 1077 : 2007  Other:

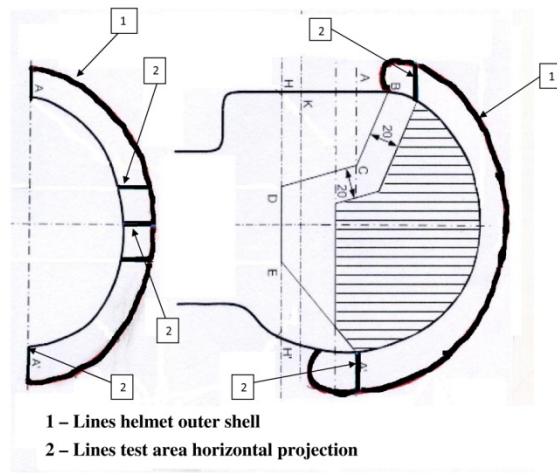
Article: Annex: Clause: 5.4

Key words:  
Test area

Question:  
How should the specified test area be marked on the helmet?

Considerations:  
*EN1077:2007 is the only standard (in the field of head protection) that defines the impact test area on the headform rather than on the helmet.*  
*In order to perform tests, the test area has to be reproduced on the helmet. Depending upon interpretation of how this should be marked, this could lead to different test areas being marked on the helmet, and obviously to different test results.*

Solution:  
The test area should be projected horizontally from the headform to the outer helmet surface.  
The 'corner' points of the test area shall be projected onto the helmet with lines laying on horizontal planes, parallel to reference plane; for side corners (points C, D, E) directed perpendicular to the vertical longitudinal plane, while for front and rear points (points A' and B) along the vertical longitudinal plane. Then the points marked on the helmet shall be connected by lines, using for example a flexible rule.





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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 397:1995 & 2012	<input type="checkbox"/> Other:
		EN 812:1997 & 2012	
Article:	Annex:	Clause: EN 397 – 6.6.2, 6.7.2 / EN 812 – 6.5.2, 6.6.2	
Key words: Shock absorption, Resistance to penetration, impact velocity			
Question: Is 0.5% the correct value for the maximum permitted difference between the actual impact velocity and the theoretical velocity for the stated drop height?			
Solution: No, the permitted difference should be 5% maximum.  0.5% is impractical and all other TC158 standards that specify a similar requirement state 5%.			



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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 397:1995 & 2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 5.2.1	
Key words: Very low temperature, pre-conditioning			
Question: Is it necessary to perform shock absorption and penetration testing at -10°C if the very low temperature conditioning at -20°C or -30°C has been requested?			
Solution: Yes, because testing at -10°C is a mandatory requirement.			



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Question related to <input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN397:1995 & 2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause:
Key words: Harness; Internal vertical clearance		
Question: Can an industrial helmet with an EPS liner in place of a conventional harness comply with EN397?		
Solution: Probably not. There is no specific requirement that requires the use of a conventional harness. However, the Note under clause 3.5 implies that a certain design was being considered when the standard was written. Whilst the presence of an EPS liner may not be cause for failure in itself, the group could not envisage a situation in which compliance with the requirements of clause 4.4 Internal vertical clearance could be met with an EPS liner instead of a conventional harness. The requirements for Internal vertical clearance relate to ventilation. Whilst EN397 has dealt with this in a design restrictive manner, Notified Bodies must ensure that helmets meet ALL requirements of a standard in order to be marked with the standard number.		



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Question related to <input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 443 : 2008	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 4.11 Flame resistance
Key words: Helmets for Fire Fighting; Flame resistance		
Question: Is it allowed to substitute the tests described in EN 443:2008 "Helmets for fire fighting in buildings and other structures" clauses 4.11 and 5.13 "flame resistance" by the tests described in EN 136:1998 clauses 7.6.3 and 8.5.2 during an Approval and EU-Certification however marking the helmet according to clause 6 of the standard with "EN443:2008".		
Solution: No. The tests in EN 443:2008 clauses 4.11 and 5.13 are completely different from the tests in EN 136:1998 clauses 7.6.3 and 8.5.2 with regard to - time of impact, - distance of the burners and sample under test, - burner flame, - positioning of the test sample.		



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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN1078:2012 +A1:2012 & EN1080:2013	<input type="checkbox"/> Other:
Article:	Annex:	Clause:	
Key words: Bicycle helmets, children			
Question: If a manufacturer asks which of EN 1078 or EN 1080 should be used for conformity assessment of bicycle helmets for children, which standard should be recommended?			
Solution: EN 1078.			
Reason: EN 1078 has no age limit for its scope of application. Whilst EN 1080 indicates a suitability of such helmets for bicycling, VG1 believe this is intended as more of an incidental use rather than primary use.			





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Question related to  PPE Regulation  EN/prEN: EN 397:2012 + A1:2012  Other:

Article: Annex: Clause: 5.2.5

Key words:  
Molten metal splash, assessment

Question:  
Shall assessment be limited to the 50mm radius circle onto which the liquid metal is poured, or shall it apply to other areas of the helmet?

Solution:  
Assessment shall apply to the shell of the helmet. With reference to the definition of clause 3.4, 'brim', the shell does not include a brim or gutter.

Reason:  
The 50mm radius circle is just a target point for pouring of the metal.



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Question related to <input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: Various (see below)	<input type="checkbox"/> Other:
Article:	Annex:	Clause: Various (see below)
Key words: Test position, Penetration testing, Molten metal testing		
Question: Certain standards make reference to the "top" of the helmet/bump cap when defining certain test positions. The top of the helmet/bump cap is not defined, so what is the "top"?		
Solution: The top of the helmet/bump cap is that point on the outside surface of the helmet/bump cap which would lie above the central vertical axis of the headform, should the helmet/bump cap be fitted normally to a headform of appropriate size. This may, or may not, coincide with the highest point of the helmet/bump cap when fitted to the test headform.  This applies to the following standards/clauses:  EN 397:2012 + A1:2012 clauses 6.7.3 & 6.12.3 EN 812:2012 clause 6.6.3 EN 12492:2012 clause 5.6.1 EN 14052:2012 +A1:2012 clause 6.11.3		



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Question related to <input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 12492:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 5.6
Key words: Penetration testing, sample restraint		
Question: How much restraint shall be used to hold a sample in position for testing?		
Solution: As little restraint as possible shall be used, but enough to ensure that the test is performed correctly. In some cases, this may be a reasonably significant amount of restraint.		
Rationale: For some designs of helmet, rotating the helmet upon the test block in order to target different parts of the 50mm radius circle may result in the test block being able to pass between the harness so that the shell rests on the test block. This situation would not occur when such a product was fitted on to a person or a full test headform. This was agreed to be an unfair condition and that sufficient restraint strapping should be used to prevent such occurrence during the test.		





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		<input type="checkbox"/> EU PPE Working Group	
Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 397:2012 + A1:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 6.12.2	
Key words: Molten metal test, orientation			
Question: In what orientation should the helmet and headform be placed when the test is performed?			
Solution: The headform should be vertical and the helmet fitted in a normal wearing position			



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Question related to  PPE Regulation  EN/prEN: EN 397:2012 + A1:2012  Other:

Article: Annex: Clause: 4.9

Key words:  
Ventilation, area measurement, covers

Question:  
Which area of ventilation should be assessed when the helmet includes hard covers/multiple layers and where the area of the aperture(s) in the cover/external layer is not the same area as the aperture(s) in the internal layer (shell)?

Solution:  
The area of the smallest aperture(s) should be assessed, whether this/these be in the cover/external layer or in the internal layer.



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Question related to <input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN443:2008	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 5.4.1
Key words: Shock absorption, headforms		
Question: For shock absorption testing of area 1a, should the headforms comply with the requirements of EN 960:2006, or is it acceptable to use headforms that comply only with EN 960:1994?		
Solution: The headforms should comply with EN960:2006.		
Rationale: EN 443:2008 clause 5.4.1 requires testing to be performed in accordance with EN 13087-2:2000. EN 13087-2:2000 makes dated reference to EN 960:1994. According to referencing rules, it could be assumed that the headforms should therefore comply with EN 960:1994. However, EN 443:2008 itself makes dated reference to EN 960:2006. Therefore, the interpretation has been made that testing should be performed in accordance with EN 13087-2:2000, but using equivalent headform sizes complying with EN 960:2006.		



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Question related to <input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN443:2008	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 5.8
Key words: Retention system strength, headforms		
Question: For retention system strength testing, should the headforms comply with the requirements of EN 960:2006, or is it acceptable to use headforms that comply only with EN 960:1994?		
Solution: The headforms should comply with EN960:2006.		
Rationale: EN 443:2008 clause 5.8 requires testing to be performed in accordance with EN 13087-5:2000. EN 13087-5:2000 makes dated reference to EN 960:1994. According to referencing rules, it could be assumed that the headforms should therefore comply with EN 960:1994. However, EN 443:2008 itself makes dated reference to EN 960:2006. Therefore, the interpretation has been made that testing should be performed in accordance with EN 13087-5:2000, but using equivalent headform sizes complying with EN 960:2006.		





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Article:	Annex:	Clause: 5.8
Key words: Marking		
Question: In clause 7.2.3 d), is the reference to clause 7.1 correct?		
Solution: No, reference should be to clause 7.2.2. instead		
Rationale: Clause 7.2.3 d) requires the significance of the markings under clause 7.1 to be explained. Clause 7.1 specifies the general markings, such as 'number of the European Standard', and requiring the significance of such markings to be explained seems illogical. EN 397:2012 + A1:2012 clause 7.2.3 d) includes a very similar requirement, but instead it is the optional markings for which the significance must be explained. It has been interpreted that the requirement in EN 812 was intended to be of a similar to that in EN 397.		



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Origin : Vertical Group 1		<input checked="" type="checkbox"/> Vertical Group	21.04.2018
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		<input type="checkbox"/> EU PPE Working Group	
Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 12492:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 4.1.4	
Key words: Ventilation			
Question: Is it acceptable for a product to include adjustable ventilation that includes settings that would reduce the area of ventilation to less than the minimum area specified?			
Solution: Yes. Ventilation features shall be adjusted to their maximum opening when measurements are taken.			



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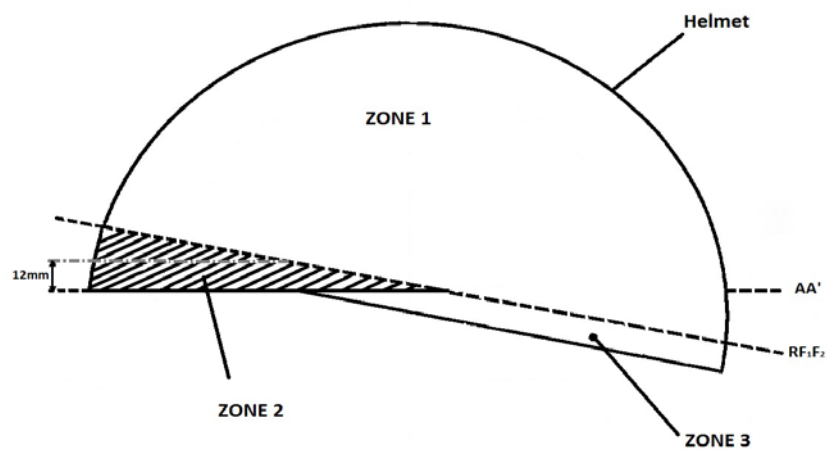
Question related to  PPE Regulation  EN/prEN: EN1384:2012  Other:

Article: Annex: Clause: 4.1

Key words:  
Thickness measurement, Area of protection

Question:  
For measurement of thickness of protective padding in the area of protection but outside of the test area, where should this measurement be made?

Solution:  
The measurement should be made 12mm up from the lower edge of zone 2 as illustrated below (see also Figure 1 of EN1384) and shall then be compared with the minimum thickness measured within zone 1.



Rationale:  
The test area equates to zone 1 of the illustration. The minimum thickness within this area should be measured to determine the minimum thickness to be used for comparison purposes.  
The minimum area of protection comprises zones 1 and 2 of the illustration.  
Zone 3 indicates a portion of the helmet that falls neither within the minimum area of protection nor the test area.  
As a minimum, a helmet must cover zones 1 and 2. Coverage of zone 3 is not mandatory.  
EN1384 is ambiguous from which edge of the area of protection the measurements at 12mm should be taken.  
It has been interpreted that it should be 12mm from the lower edge of the area of protection, as illustrated above. The minimum thickness along this line should be compared to the minimum thickness in the test area (zone 1).



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Question related to  PPE Regulation

EN/prEN: EN 1384:2012

Other:

Article:

Annex:

Clause: 6.2

Key words:

Test sequence, sample restoration

Question:

Is it acceptable to restore samples following reversible damage before performing the next test in the test sequence?

Solution:

No, samples should be tested without restoration.

Rationale:

Reversible damage can occur during testing which could influence the outcome of tests later in the test sequence, e.g. detachment of ventilation covers might have a detrimental effect on penetration resistance.

Some standards specify a sequence of testing just to minimise the number of samples required for a test programme.

However, it was interpreted in this case that the sequence of testing was not just intended to reduce sample quantities, therefore samples should be left unchanged following each test before moving on to the next test in the sequence.



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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 14052:2012 + A1:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: 5.2.2	
Key words: Resistance to penetration, helmet test support			
Question: Is the sample tested on a headform, as suggested by clause 5.2.2?			
Solution: No, the sample is tested on the test block specified by EN 13087-3.			
Rationale: It has been interpreted that reference to a headform was an editorial error.			



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Question related to  PPE Regulation  EN/prEN: EN 13484:2012  Other:

Article: Annex: Clause: Figure 2

Key words:  
Extent of coverage

Question:  
Is the dimension of 25,5mm between points D & E correct?

Solution:  
No, the drawing includes an error.

The 25,5mm dimension should be drawn between the vertical transverse plane and point E.

Rationale:  
EN 13484:2012 figure 2 places point E at 25.5mm behind point D, but also behind the vertical transverse plane.

This is in contradiction, because 25,5mm behind point D would be in front of the vertical transverse plane.

EN 1077:2007 figure 1 is very similar and shows point E positioned 25,5 mm behind the vertical transverse plane.



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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 1385:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: Clause 5.2 & Figure 1	
Key words: Coverage			
Question: Should point C be the mid-point of A-Z when measured over the surface of the headform, or when projected from the side?			
Solution: Point C should be the mid-point of A-Z when measured over the surface of the headform.			



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Question related to	<input type="checkbox"/> PPE Regulation	<input checked="" type="checkbox"/> EN/prEN: EN 1385:2012	<input type="checkbox"/> Other:
Article:	Annex:	Clause: Clause 7.8 & Figure 4	
Key words: Retention system effectiveness			
Question: In figure 4, where should the 600mm vertical dimension be measured from?			
Solution: The 600mm should be measured upwards from the reference plane.			
Rationale:  With reference to EN 1078:2012 figure 5, an AA line was marked to show a section in the drawing.  The AA line was marked erroneously in figure 4 of EN 1385, as no section was included in the drawing. All other standards that include this test require the 600mm vertical dimension to extend upwards from the reference plane.			





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Question related to  PPE Regulation  EN/prEN: EN 397:2012  Other:

Article: Annex: Clause: 7.1 f)

Key words:  
Helmet shell, Materials, Marking

Question:  
In the case of a helmet for which the exterior comprises multiple components of different materials, what is the shell for which the abbreviation of the material shall be marked?

Solution:  
The shell shall be considered to be the predominant component of the exterior of the helmet and an abbreviation for the material of that predominant component shall be marked.  
  
Abbreviations for the materials of other components may also be marked, however, the abbreviation used must match the material of the component upon which it is marked.