

# AN INTERVIEW WITH MICK SPENCER

## QUALITY ASSURANCE & PRODUCTION MANAGER



One year on from the introduction of the new PPE Directive, we caught up with Dimensions' Quality Assurance & Production Manager, Mick Spencer to find out how Dimensions have tackled the legislative changes.

What practical difference has moving from the old PPE Directive 89/686/EEC to the new Regulation 2016/425 made?

Making the workplace safe is the first priority which includes providing instructions, procedures, training and supervision to encourage people to work safely and responsibly.

However, should personal protective equipment be a requirement, our customers can have peace of mind that all the necessary steps are being taken to assure all our items of PPE will be in conformance with the new regulation.

This will provide the confidence that our customers are investing in a product that will protect their greatest asset: their workforce.

What does this mean to Dimensions?

We currently have a comprehensive register of all the PPE we supply and due to the change in legislation we have taken the opportunity to create a dedicated system for coding and traceability of PPE.

We are working with our manufacturing base and our notified body to ensure all products will be manufactured in conformance to the new regulation and timeline. We are also working closely with our inspection partner for ongoing surveillance of PPE within our supply chain. Having a dedicated coding system of PPE items has greatly improved the access speed to products. We can carry out quick audits to ensure products have the correct technical files, while ensuring we conform to the standard and meet the requirements of the regulation. We can also identify products that require ongoing testing and surveillance as part of the manufacturing process, which led us to notice that customers required hi-vis garments to be post-branded with large logos. This led to some concerns, as we felt larger logos could render the garments to a non-conforming standard.

Under the new regulation, if we as a business post-brand a garment, we change status from distributor to manufacturer. By working with SATRA, and our supply chain partners, we have restricted and standardised the size of post-branded logos to ensure the garments continue to conform to the standard.

Has it led to a general improvement in standards and compliance?

The PPE Directive is over 20 years old and needed updating in order to meet current technology, while the new regulation (2016/425) provides a level playing field for suppliers as well as enhancing end user safety.

Have we seen any older products disappear from the market as a result of the Regulation, particularly in hearing protection?

We have found some suppliers have dropped certain styles in favour of new development. The change has brought about a new enthusiasm to shake up styles that may not have changed in over two decades. We have also seen a lot of products fall into 'category I' type PPE, which is for items that provide a 'minimal risk'. The services of a notified body are not required for this category, as items can be 'self certified'. 'Category II' and 'Category III' items must be certified by a notified body.

Is market surveillance of manufacturers' compliance with the underlying test standards good enough?

Directive or Regulation PPE should always undergo continuous surveillance to ensure that items do not change over the course of its certification life. Periodic site audits and product testing should be undertaken in conjunction with a notified body.

With this Regulation (2016/425), the market surveillance authorities have clear enforcement guidelines, which will strengthen any shortcomings previously identified by industry professional.

Are manufacturers providing the necessary documentation to buyers and/or distributors when they ask for it?

It is surprising how well the suppliers have responded to the changes. As well as our own internal systems, websites have been rebuilt with clear links to important documentation, user information sheets have also been reworked to include additional links to key documents.

These changes are exactly the reasons it was necessary to bring things up to date through the new Regulation.

Do people think there is a case for further regulation and testing?

Through the practise of continuous improvement we should always consider the possibility of additional regulation and testing. We are in an industry where we are protecting the most important asset – the employee. This should always be taken seriously.

Is there any advice you'd like to give to our customers?

The most important piece of advice I can give to our customers is that they need to make sure that they buy their PPE from a reliable, fully compliant supplier.

A biography of Mick's career to date:

I have worked in uniform manufacturing for 40 years, with most of this time spent producing for the Ministry of Defence.

My first experience of technical safety wear was producing Admiralty foul weather jackets for the Navy. The complexity of these garments provided the motivation to move into other specialist areas personal protection. I was the senior training instructor for the uniform division of Coats Viyella with responsibility for training the factory sewing machine instructors.

Following the launch of the Personal Protective Equipment at work regulations in 1992, I created a standards team. We covered all PPE items head-to-toe, I went on to develop a PPE advisory team that would visit our customers to assist with the risk assessment and selection of safety wear. I am currently responsible for PPE across our group companies.