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International Organization for Standardization
Международная Организация по Стандартизации



Our ref. TMB / NWIP

TO THE ISO MEMBER BODIES

Date 2013-03-12

New work item proposal – *Occupational health and safety management systems - Requirements*

Dear Sir or Madam,

Please find attached a new work item proposal submitted by BSI (UK) on *Occupational health and safety management systems - Requirements*. It should be noted that, if the NWIP is approved, the work is proposed to be carried out in a Project Committee.

In addition to the NWIP and corresponding information received from BSI, you will find attached a letter from Rob Steele, ISO Secretary General, addressing the right and ability of ISO and its members to deal with the subject area, as well as a letter from the International Labour Organization (ILO) on this proposal.

You are kindly invited to complete the ballot form ([Form 05](#)) which can be downloaded at www.iso.org/forms and send it, preferably in Word format, to the Secretariat of the ISO Technical Management Board at tmb@iso.org before **11 June 2013**.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'S. Clivio', written in a cursive style.

Sophie Clivio
Secretary to the Technical Management Board

Encl: Letter from Rob Steele (ISO Secretary General)
Letter from the ILO
Letter from BSI
NWIP (Form 04)
OHSAS Justification Study
2011 OHSAS Standards and Certificates Survey results data (see separate Excel file)
OHSAS 18001
OHSAS 18001 - Proof of concept draft

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**Rob Steele**

Secretary-General

Your ref.
Our ref. TMB/NWIP

Date 2013-03-122

TO THE ISO MEMBER BODIES**New work item proposal – Occupational health and safety management systems - Requirements**

Dear Sir or Madam,

A New Work Item Proposal (NWIP) from BSI on "*Occupational Health and Safety (OH&S) Management Systems – Requirements*" has been circulated today to ISO members for vote (see attached).

This letter does not express any view on the merits of the NWIP, instead I would like to address the right and ability of ISO and its members to deal with the subject area. The idea of an ISO standard on this subject is not new. However, it is being proposed again as BSI feel the landscape for OH&S standards has evolved over the last few years. For example, ISO has since successfully developed ISO 26000 : 2010 "Guidance on social responsibility", there have been a number of national developments on OH&S standards, and ISO has now adopted a common framework for management system standards. Given high stakeholder interest in the subject, you will no doubt be contacted by parties that oppose and those that support the proposal. That is good and what the ISO process is all about.

Attached you will find a letter from the International Labour Organization (ILO) dated 26 February 2013 expressing its concern with the proposal. Their comments are included to support greater collaboration with the ILO, and to inform ISO members about the ILO's views. However these are ILO's opinions only, and it's important to clarify a number of issues related to the role of ISO in this field, specifically:

Is ISO "undermining the role of governments" by developing such a standard?

Put another way, is ISO compromising the role of governments by developing standards in areas that are the subject of national regulation, such as health and safety of workers? Only governments can decide on regulations. This includes whether a voluntary ISO standard is referenced or used as a basis for regulations. ISO has no role or intent to develop standards that confuse or compromise regulations or public policy. This objective is clearly stated in Annex SO of ISO's Directives on "Principles for developing ISO and IEC Standards related to or supporting public policy initiatives". ISO has already successfully developed International Standards in highly regulated areas (e.g., food safety, medical devices) and experience has shown that the ISO standard has added value to the role of governments and their regulations, rather than having been a hindrance.

Does ISO have the competence to address labour and social issues?

The ILO is a specialized agency of the United Nations that brings together representatives of governments, employers and workers to jointly develop standards, policies and programmes promoting decent work for all. The ILO's international labour standards (ILS) are a means of achieving its objectives, including through ratification in its member States. One of ISO's strengths is the ability of its members to mobilize national stakeholders with expertise and interest in the standards that it develops, and to connect with the most relevant international organizations on a subject. In addition, ISO's audience is not States, but rather organizations. As new fields are proposed, ISO's network is triggered to ensure that the right individuals are engaged in its projects. ISO's competence is assured through its development procedures and its network of national members that involve the required expertise and stakeholder interests. A recent example is the successful development of ISO 26000 involving 6 categories of stakeholders including but not limited to industry, labour and government.

Can ISO decide to pursue work if ILO disagrees?

In 2007, the ILO Governing Body (the organization's Board) requested that ISO refrain from developing an International Standard on occupational health and safety management systems. In 2011, the ILO expressed concern and disappointment about ISO's decision to proceed with the field of human resources. In 2013, in reply to the attached BSI NWIP, ILO suggests again that this field is not within the competence of ISO. It's important to note that ISO is an independent international organization with its own structures and accountabilities. Therefore it is only ISO members that can decide to pursue a new field of activity. It would also go against ISO's own processes to prevent the circulation of new work on the basis of an external organization's disagreement.

I'm hoping that the justification in the NWIP, along with ILO's letter and this letter, help to clarify the issues as you consult stakeholders on this proposal. I encourage you to listen and engage with all relevant interests in your country, to challenge any unfounded claims for or against the proposal and to develop your position accordingly.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Rob Steele', with a stylized flourish at the end.

Rob Steele



International Labour Office
Bureau International du Travail
Oficina Internacional del Trabajo

Mr. Kevin McKinley
Deputy Director-General
International Organization for
Standardization
1, ch. de la Voie-Creuse
P.O. Box 56
1211 Geneva 20

A/45

Réf. BIT/ILO

Votre réf.

Geneva, 26 February 2013

Dear Kevin,

I refer to your email of 12 February 2013, requesting ILO feedback before the New Work Item Proposal (NWIP) on OSH-MS Requirements is sent out for vote by ISO Members. I have been asked to reply on behalf of the International Labour Office.

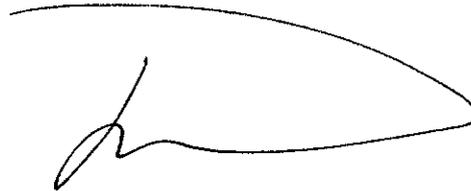
In March 2007, the ILO Governing Body decided to ask ISO to refrain from developing an international standard on occupational safety and health management systems (OSH-MS), and reaffirmed ILO's mandate in the field of occupational safety and health; the ILO Director General communicated this decision to ISO by letter. Subsequently, following a survey of its Members, the ISO Technical Management Board (TMB) concluded that there was little support in ISO for any standards activity on the subject. No further Governing Body discussion of the subject has occurred since then.

More recently in March 2011, the ILO Governing Body expressed concern and disappointment at ISO's decision to proceed with activity in the field of human resource management, and requested the Director-General to respond to any ISO request for cooperation on the matter by underlining the need for a clear and shared understanding of the respective competences of the ILO and of ISO as the precondition for any such cooperation. An initial draft agreement exchanged between secretariats included certain principles recognizing the primacy of international labour standards among the sources of reference for ISO's work, as agreed in the 2005 ILO-ISO Memorandum of Understanding in the field of social responsibility. Following the latest response of ISO, the status of those discussions is under review. This topic will be discussed at the meeting to be held March 8 between the ILO Deputy Director General for Policy and the ISO Director General.

Thus, in recalling the Governing Body's decision to ask ISO to refrain from action in the field of OSH-MS, and its further position on the need for a clear and shared understanding of the ILO's and ISO's respective competences, the International Labour Office

affirms the need to reach such an understanding in order to resolve the issues raised by ISO's renewed inquiry in the field of OSH-MS. If ISO nonetheless proceeds with a new work item vote on OSH-MS before such an understanding is reached between the two organizations, ILO would request that ISO inform its Members of this communication in response to the request of the ISO Secretariat by annexing the text to the NWIP circulated for ballot vote.

Yours faithfully

A handwritten signature in black ink, consisting of a large, sweeping loop at the top, followed by a smaller loop and a horizontal line that ends in a small hook.

Janelle Diller
Deputy Legal Adviser

6 February 2013

Mr. Rob Steele
ISO Secretary General

Dear Rob

New work item proposal on Occupational health and safety management

On behalf of BSI, and with the support of both the national stakeholders and the OHSAS Project Group, I am delighted to submit this new work item proposal for the development of an International Standard on 'Occupational health and safety management systems – Requirements'.

The need for organizations worldwide to improve their OH&S performance cannot be underestimated; the statistics for health and safety incidents, accidents and their related costs (to the individual, to organizations and to society) continue to be horrific.

Good health and safety management enables an organization to achieve effective management of its business and OH&S risks; the protection of those doing work under its control (direct employees as well as contractors); the protection of those affected by its activities (visitors, neighbours, people passing the organization's work sites); and the ability to respond to the challenges of the global environment.

There is a clearly documented market need for standardization in this field. Guidelines in the field of Occupational health and safety are not suitable to be used for demonstration of conformity. This has led to a number of national and consortia standards being developed to meet this need, and has resulted in their use internationally. The OHSAS "Standards and Certificates Survey" has shown a rapid rise in the rate of use of OHSAS 18001 and equivalent standards over the past 10 years. More importantly, it has shown that the standards are now being used in **127 countries** around the world, which strongly suggests that there would be value to seeking to harmonize OH&S management practices into International Standards, and to share best practices. Using the common structure, this new International standard will be easily integrated into the existing series of ISO Management System Standards thereby significantly facilitating its implementation.

If the proposal is approved, BSI would like to offer to host the first meeting in September 2013 in order to progress this very important area.

Yours sincerely

Amanda Richardson,
Head of International Policy, BSI



NEW WORK ITEM PROPOSAL	
Closing date for voting 2013-06-11	Reference number (to be given by the Secretariat)
Date of circulation 2013-03-12	ISO/TC / SC N
Secretariat	X Proposal for new PC

A proposal for a new work item within the scope of an existing committee shall be submitted to the secretariat of that committee with a copy to the Central Secretariat and, in the case of a subcommittee, a copy to the secretariat of the parent technical committee. Proposals not within the scope of an existing committee shall be submitted to the secretariat of the ISO Technical Management Board.

The proposer of a new work item may be a member body of ISO, the secretariat itself, another technical committee or subcommittee, or organization in liaison, the Technical Management Board or one of the advisory groups, or the Secretary-General.

The proposal will be circulated to the P-members of the technical committee or subcommittee for voting, and to the O-members for information.

IMPORTANT NOTE: Proposals without adequate justification risk rejection or referral to originator.

Guidelines for proposing and justifying a new work item are contained in Annex C of the ISO/IEC Directives, Part 1.

Proposal (to be completed by the proposer)

Title of the proposed deliverable. <i>(in the case of an amendment, revision or a new part of an existing document, show the reference number and current title)</i>	
English title	Occupational health and safety management systems - Requirements
French title (if available)	Systèmes de management de la santé et de la sécurité au travail — Exigences
Scope of the proposed deliverable. <p>This International Standard specifies requirements for an occupational health and safety (OH&S) management system, to enable an organization to control its OH&S risks and improve its OH&S performance. It does not state specific OH&S performance criteria, nor does it give detailed specifications for the design of a management system.</p> <p>This International Standard is applicable to any organization that wishes to:</p> <ol style="list-style-type: none">establish an OH&S management system to eliminate or minimize risks to personnel and other interested parties who could be exposed to OH&S hazards associated with its activities;implement, maintain and continually improve an OH&S management system;assure itself of its conformity with its stated OH&S policy;demonstrate conformity with this International Standard. <p>All the requirements in this International Standard are intended to be incorporated into any OH&S management system. The extent of the application will depend on such factors as the OH&S policy of the organization, the nature of its activities and the risks and complexity of its operations.</p> <p>This International Standard is intended to address occupational health and safety management systems, and is not intended to address other health and safety areas such as employee wellbeing/wellness programmes, product safety, property damage or environmental impacts.</p>	

New work item proposal

Purpose and justification of the proposal.

Please refer to the supporting Justification Study (provided in accordance with Annex SL to the ISO/IEC Directives, Procedures Specific to ISO)

If a draft is attached to this proposal,:

Please select from one of the following options (note that if no option is selected, the default will be the first option):

Draft document will be registered as new project in the committee's work programme (stage 20.00)

Draft document can be registered as a Working Draft (WD – stage 20.20)

Draft document can be registered as a Committee Draft (CD – stage 30.00)

Draft document can be registered as a Draft International Standard (DIS – stage 40.00)

Is this a Management Systems Standard (MSS)?

Yes No

Indication(s) of the preferred type or types of deliverable(s) to be produced under the proposal.

International Standard Technical Specification Publicly Available Specification Technical Report

Proposed development track 1 (24 months) 2 (36 months - default) 3 (48 months)

Known patented items (see ISO/IEC Directives, Part 1 for important guidance)

Yes No If "Yes", provide full information as annex

A statement from the proposer as to how the proposed work may relate to or impact on existing work, especially existing ISO and IEC deliverables. The proposer should explain how the work differs from apparently similar work, or explain how duplication and conflict will be minimized.

There are currently no generic ISO or IEC deliverables specifically on occupational health and safety management systems (although some items could be considered related, e.g. ISO 30000:2009 Ships and marine technology -- Ship recycling management systems -- Specifications for management systems for safe and environmentally sound ship recycling facilities; or ISO/TR 12885:2008 Nanotechnologies -- Health and safety practices in occupational settings relevant to nanotechnologies, ISO_DIS 21101 Adventure Tourism - Safety management systems - Requirements)

There is reference to occupational health and safety management systems in publications such as the ISO handbook "Guide to the Integrated Use of Management System Standards"

One of the key factors that often leads to the development of a standard is the issue of "safety". This issue is addressed in many product standards and guidelines for the safe handling and operation of materials, equipment or processes. Consequently there may need to be wide interaction between the proposed PC and many existing other ISO TCs (for example ISO/TC 21 Equipment for fire protection and fire fighting; ISO/TC 92 Fire Safety; ISO/TC 94 Personal safety -- Protective clothing and equipment; ISO/TC 145 Graphical symbols; ISO/TC 199 Safety of machinery). However, the emphasis of the proposed PC's work should be on the achievement of good management practices within organizations and not on the individual technologies addressed in these other committees (A listing of some further examples of TCs and related standards is given below)

In addition, as the development of a management system standard is being proposed, there will need to be interaction with other ISO MSS committees and with the ISO/TMB/TAG13-JTCG, to ensure that the proposed ISO management system standards are aligned.

There is particularly a need for co-ordination with ISO/TC 207, as the function of health and safety is often combined with the function for environmental management within organizations.

Additionally, there is a need for co-ordination with ISO/TC 176, as often organizations seek to combine their quality, health and safety, and environmental management systems into an "integrated" management system.

Outside of ISO and the IEC the key document in this field is the ILO-OSH "Guidelines on occupational safety and health management systems". As these are written as guidelines, and not aligned with the other ISO MSS, it has been found that this presents a barrier to their use by organizations trying to demonstrate that they have adopted good OH&S practices. Additionally, a number of organizations follow the Safety Checklist Contractor (SCC) scheme (also known as the Safety Certificate Contractor scheme), which recognizes standards such as ISO 9001 and ISO 14001, but does not require the implementation of a full OH&S management system

By working in liaison with the various ISO committees, the ILO and the SCC, it is expected that duplication and conflict will be minimized.

A listing of some pertinent TCs and their standards relating to safety includes:

TC 139/SC9 ISO 4413:2010 Hydraulic fluid power -- General rules and safety requirements for systems and their components

TC 199 ISO 12100:2010 Safety of machinery -- General principles for design -- Risk assessment and risk reduction

TC 72/SC8 ISO 11111-4:2005 Textile machinery -- Safety requirements -- Part 4: Yarn processing, cordage and rope manufacturing machinery

TC145/SC2 ISO 16069:2004 Graphical symbols -- Safety signs -- Safety way guidance systems (SWGS)

TC20/SC14 ISO 14620-3:2005 Space systems -- Safety requirements -- Part 3: Flight safety systems

TC67/SC6 ISO 10418:2003 Petroleum and natural gas industries -- Offshore production installations -- Analysis, design, installation and testing of basic surface process safety systems

TC85/SC5 ISO 14943:2004 Nuclear fuel technology -- Administrative criteria related to nuclear criticality safety

TC44/SC9 ISO 15012-1:2004 Health and safety in welding and allied processes -- Requirements testing and marking of equipment for air filtration -- Part 1: Testing of the separation efficiency for welding fume

A listing of relevant existing documents at the international, regional and national levels.

The key documents to be considered include:

The ISO/IEC Directives, Procedures Specific to ISO, Annex SL

OHSAS 18001 Occupational health and safety management systems – Requirements

OHSAS 18002 Occupational health and safety management systems – Guidelines for the implementation of OHSAS 18001:2007

GB/T28001 Occupational health and safety management systems - Requirements

AS/NZ 4801 Occupational health and safety management systems - Specification with guidance for use

ANSI Z10 Occupational health and safety management systems

ISO 31000 Risk management

ILO-OSH Guidelines on occupational safety and health management systems

In addition to the above documents, a number of other health and safety standards and regulations are listed in the "OHSAS Standards and Certificates Survey" and will need to be considered during the development of the proposed standard

A simple and concise statement identifying and describing relevant affected stakeholder categories (including small and medium sized enterprises) and how they will each benefit from or be impacted by the proposed deliverable(s)

Health and safety management guidelines and practices are usually agreed under a tripartite system involving representation by governments/regulators, industry and labour organizations.

It would be extremely helpful to the development of the proposed standards if a similar tripartite representation could be achieved amongst the experts participating on the PC, and particularly if representatives from labour organizations could be encouraged to participate.

In looking at the benefits that each group of stakeholders might achieve:

1) **Governments and regulators** would have access to international standards that they could require their national industries to follow, in lieu of creating new legislation in this field. In comparison to the development process for such legislation, the development of a standard can be a quicker and more effective process, and can be updated on a more regular basis. In addition governments and regulators would have the knowledge that their industries would not be at a competitive disadvantage when compared to those in other countries when applying such international standards. Further, they could benefit by seeing improved compliance with regulations by organizations, and reductions in OH&S incidents and accidents.

2) **Industry** would benefit by knowing that it was working to the most up to date agreed set of international practices for health and safety management and that national differences would no longer represent a barrier to trade. In addition, as globalization is moving more towards showing concern for issues on social responsibility and sustainability, industry would be able to take comfort in knowing that its supply chains around the world were working to an internationally agreed set of criteria, thus giving their brands a degree of additional protection. Further, the availability of an aligned OH&S MSS would facilitate the "integration" of OH&S into organizations' management systems

3) **Labour** would benefit by knowing that organizations using the standards were being proactive in their approach to health and safety management in order to safeguard their workforces, or other persons under the organizations' control.

4) **Visitors, neighbours and people passing the organization's sites** would benefit by knowing that the organization had considered their health and safety, and should not be putting them at risk.

5) **For SMEs:** As with other ISO MSS the proposed initial standards would be generic and applicable to all types and sizes of organization; consequently a small or medium sized enterprise may be able to employ a simpler OH&S management system than the more complex systems that larger organizations may need to use, as applicable to their needs.

The issue of health and safety in small organizations is known to be a problem that is common to many countries, with a disproportionate number of incidents and accidents occurring in such organizations. The promotion of an agreed international standard to such organizations, along with the supporting infrastructure of training courses etc. to support it, may create a level of awareness of health and safety issues in such organizations that other programmes have not yet managed to achieve. While this proposal is for a full OH&S ISO MSS, ISO could look in the future at producing deliverables specifically for smaller organizations.

<p>Liaisons: A listing of relevant external international organizations or internal parties (other ISO and/or IEC committees) to be engaged as liaisons in the development of the deliverable(s). ISO/TMB/TAG13- JTCG ISO/TC 207/SC 1 ISO/TC 176/SC 2 ISO/TC 260 International Labour Organization World Health Organization Safety Contractor Certificate</p>	<p>Joint/parallel work: Possible joint/parallel work with: <input type="checkbox"/> IEC (please specify committee ID) <input type="checkbox"/> CEN (please specify committee ID) <input type="checkbox"/> Other (please specify)</p>
<p>A listing of relevant countries which are not already P-members of the committee. N/A</p>	
<p>Preparatory work (at a minimum an outline should be included with the proposal) X A draft is attached <input type="checkbox"/> An outline is attached <input type="checkbox"/> An existing document to serve as initial basis The proposer or the proposer's organization is prepared to undertake the preparatory work required <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Proposed Project Leader (name and e-mail address) Mr Kristian Glaesel kristian@glaesel-hseq.dk</p> <p>Note: Given the scope of this work, we expect there will be a need to appoint a PC Chairman and Secretary and to establish a Working Group with the Project Leader as the Convener, a Deputy Convener, a Working Group Secretary (and potentially a Twinned Working Group Secretary).</p>	<p>Name of the Proposer (include contact information) Amanda Richardson, BSI Amanda.Richardson@bsigroup.com</p>
<p>Supplementary information relating to the proposal X This proposal relates to a new ISO document; <input type="checkbox"/> This proposal relates to the amendment of existing ISO document <input type="checkbox"/> This proposal is for the revision of an existing ISO document; <input type="checkbox"/> This proposal relates to the adoption as an active project of an item currently registered as a Preliminary Work Item; <input type="checkbox"/> This proposal relates to the re-establishment of a cancelled project as an active project. Other:</p>	

Annex(es) are included with this proposal (give details)

- 1 Justification study (in accordance with Annex SL)
- 2 2011 OHSAS Standards and Certificates Survey results data



**Justification Study
for an ISO International Standard on**

**Occupational health and safety (OH&S)
management systems - Requirements**

February 2013

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1. Overview, Purpose and Scope of the MSS

1.1. Purpose and scope

What is the proposed purpose and scope of the MSS? Is the document supposed to be a guidance document or a document with requirements?

The proposed OH&S ISO MSS would be an International Standard specifying requirements (a "Type A" ISO MSS)

The International Standard is intended to provide organizations with the elements of an effective occupational health and safety (OH&S) management system that can be integrated with other management requirements and help organizations achieve OH&S and economic objectives. This standard, like other International Standards, is not intended to be used to create non-tariff trade barriers or to increase or change an organization's legal obligations. The overall aim of the International Standard is to support and promote good OH&S practices, in balance with socio-economic needs.

The International Standard would specify requirements for an OH&S management system to enable an organization to: develop and implement a policy and objectives which take into account legal requirements and information about OH&S risk, establish processes to achieve the policy commitments, take action as needed to improve its performance, and demonstrate the conformity of the system to the requirements. It is intended to apply to all types and sizes of organizations and to accommodate diverse geographical, cultural and social conditions.

Proposed Scope statement:

This International Standard specifies requirements for an occupational health and safety (OH&S) management system, to enable an organization to control its OH&S risks and improve its OH&S performance. It does not state specific OH&S performance criteria, nor does it give detailed specifications for the design of a management system.

This International Standard is applicable to any organization that wishes to:

- a) establish an OH&S management system to eliminate or minimize risks to personnel and other interested parties who could be exposed to OH&S hazards associated with its activities;
- b) implement, maintain and continually improve an OH&S management system;
- c) assure itself of its conformity with its stated OH&S policy;
- d) demonstrate conformity with this International Standard.

All the requirements in this International Standard are intended to be incorporated into any OH&S management system. The extent of the application will depend on such factors as the OH&S policy of the organization, the nature of its activities and the risks and complexity of its operations.

This International Standard is intended to address occupational health and safety management systems, and is not intended to address other health and safety areas such as employee wellbeing/wellness programmes, product safety, property damage or environmental impacts.

1.2. Type of product to be produced

Would the proposed MSS work item result in an International Standard (IS), an ISO(/IEC) Guide, a Technical Specification (TS), a Technical Report (TR), a Publicly Available Specification (PAS), or an International Workshop Agreement (IWA)?

The proposal would result in an International Standard specifying requirements for an OH&S management system (a “Type A” ISO MSS).

1.3. Inclusion of product specifications, test methods etc

Does the proposed purpose or scope include product (including service) specifications, product test methods, product performance levels, or other forms of guidance or requirements directly related to products produced or provided by the implementing organization?

The proposed purpose or scope of the International Standard does not include any type of guidance or requirements for products or services produced or provided by an implementing organization.

1.4. Responsibility for the proposed MSS

Is there one or more existing ISO committee or non-ISO organization that could logically have responsibility for the proposed MSS? If so, identify.

There are no existing ISO committees that could logically have responsibility for the proposed OH&S ISO MSS.

There is the possibility that either the International Labour Organization (ILO), or the OHSAS Project Group, could be given such responsibility as non-ISO organizations, though a new ISO Project Committee dealing with this subject matter is the preferred option.

1.5. Identification of relevant reference materials

Have relevant reference materials been identified, such as existing guidelines or established practices?

Relevant materials have been identified. These include:

- The ISO/IEC Directives, Procedures Specific to ISO, 2012, Annex SL
- OHSAS 18001:2007, *Occupational health and safety management systems — Requirements*
- OHSAS 18002:2008, *Occupational health and safety management systems — Guidelines for the implementation of OHSAS 18001*
- GB/T28001, *Occupational health and safety management systems - Requirements*
- AS/NZ 4801 *Occupational health and safety management systems - Specification with guidance for use*
- ANSI Z10 *Occupational health and safety management systems*
- ISO/IEC Guide 73 *Risk management - Vocabulary*
- ISO 31000 *Risk management*
- International Labour Organization:2001, *Guidelines on Occupational Safety and Health Management Systems (OSH-MS)*
- ISO 9001 *Quality management systems - Requirements*

- ISO 14001 *Environmental management systems - Requirements with guidance for use*

In addition there are many national OH&S management system standards, regulations and guidelines available.

1.6. Availability of technical experts to support the standardization work, and their representation

Are there technical experts available to support the standardization work? Are the technical experts direct representatives of the affected parties from the different geographical regions?

During the development of the OHSAS standards, the OHSAS Project Group received direct input from delegates representing approximately 20 different countries, from many different geographic regions, with many more contributing through commenting on the drafts (all continents were represented).

The proposed standards are generic and could affect all geographic regions.

A critical issue is the need to have representation from governmental interests, industrial interests, and particularly those representing labour organizations' interests, in order to replicate the tripartite system under which many OH&S regulations are developed.

We consider that there would be more than sufficient experts, from all the affected parties, from all the different geographic regions, available to support the standardization work.

1.7. Efforts required to develop the document/s

What efforts are anticipated as being necessary to develop the document in terms of experts needed and number/duration of meetings?

We estimate that a working group of approximately 30 experts (from government, industry and labour) would be needed to develop the document.

We anticipate that the development of the standard would follow the default 3 year track, and would require 5 face-to-face meetings for the working group, each of 5 days duration, with additional inter-meeting working by webinars, conference calls and e-mail

This work needs to be closely aligned with the revisions of ISO 9001 and ISO 14001, and may be subject to delays if those activities encounter any difficulties. Consequently, close co-ordination will be needed with ISO/TC 176 and with ISO/TC 207.

1.8. Anticipated completion date

What is the anticipated completion date?

Three years of effort is estimated to be required from the time of approval of the project

Given the ISO/IEC Directives, Procedures Specific to ISO, Annex SL for developing MSS are relatively new (in 2012), we have already developed a Preliminary "Proof of Concept" Draft (provided with this Justification Study) showing how the requirements of OHSAS 18001 can be migrated into the Annex SL structure, and how they align with the recent ISO/WD2 14001

1.9. What sort of document?

Is the MSS intended to be a guidance document, contractual specification or regulatory specification for an organization?

It is intended to be a (Type A) "Requirements" specification

2. Principle 1 - Market Relevance

2.1. Identification of all the affected parties

Have all the affected parties been identified? For example:

a) organizations (of various types and sizes): the decision-makers within an organization who approve work to implement and achieve conformance to the MSS;

b) customers/end-users, i.e. individuals or parties that pay for or use a product (including service) from an organization;

c) supplier organizations, e.g. producer, distributor, retailer or vendor of a product, or a provider of a service or information;

d) MSS service provider, e.g. MSS certification bodies, accreditation bodies or consultants;

e) regulatory bodies;

f) non-governmental organizations.

All affected parties have been identified as follows:

1) **Organizations of various types and sizes:** the decision-makers within an organization who use standards to improve business processes and accountability. The decision-makers will be people in the organization who approve work to implement an OH&S management system and achieve conformance to the future OH&S ISO MSS. Depending on the size and complexity of the organization, and the scope of their OH&S management system implementation, this may include the CEO or equivalent, people with responsibility for corporate governance, risk management, company/corporate secretary, or any manager responsible for the general management of an organization or for its specific functions or programmes.

2) **People under the control of the organization,** i.e. direct employees and contractors. Direct employees and contractors will benefit by having a safer working environment and by being able to participate in the setting of, and influence, the OH&S policies and practices in the organization

3) **Visitors, neighbours and people passing near the organization's sites.** Visitors, neighbours and people passing near the organization's sites will have assurance that their health and safety has been taken into consideration and is not going to be put at risk

4) **Customers/end-users,** i.e. individuals or parties that pay for or use a product or service from an organization. Customers of organizations that implement the proposed OH&S ISO MSS will benefit from effective governance, accountability, responsiveness, and efficient operations demonstrated by that organization.

5) **Supplier organizations.** Suppliers that have implemented an OH&S management system in accordance with the proposed OH&S ISO MSS will be able to demonstrate effective and accountable business processes and sustainable services to their customers. This assists in trade and supplier/customer relations. Suppliers may be the producer, distributor, retailer or vendor of a product, or a provider of a service.

6) **OH&S management system service providers.** These providers would include national standards bodies and independent certification bodies providing 3rd party audit or assessment services; consultants with responsibility for implementing an OH&S management system for organizations or providing in-house assessment; and training organizations offering training (accredited or otherwise) in implementing an OH&S

management system. The providers will benefit by being able to focus their activities on a single OH&S standard, rather than needing to share resources across a range of them.

7) **Governments and regulators** would have access to international standards that they could require their national industries to follow, in lieu of creating new legislation in this field. In comparison to the development process for such legislation, the development of a standard can be a quicker and more effective process, and can be updated on a more regular basis. In addition governments and regulators would have the knowledge that their industries would not be at a competitive disadvantage when compared to those in other countries when applying such international standards. Further, they could benefit by seeing improved compliance with regulations by organizations, and reductions in OH&S incidents and accidents.

8) **Non-governmental organizations.** The private sector and the non-profit sector could use the proposed OH&S ISO MSS to implement an effective OH&S management system, thereby:

- reducing their OH&S incidents and accidents,
- reducing disruptions to their operations,
- lowering their insurance premiums
- providing assurance to their workers, contractors, visitors, neighbours, and people passing their sites, that their activities are being managed in a safe manner
- ensuring their legal compliance
- being able to demonstrate to stakeholders that they are applying good OH&S practices (through independent external assessments against the OH&S ISO MSS).

2.2. Need for an MSS

What is the need for this MSS? Does the need exist at a local, national, regional or global level? Does the need apply to developing countries? Does it apply to developed countries? What is the added value of having an ISO document (e.g. facilitating communication between organizations in different countries)?

The OHSAS Standards and Certificates survey has shown that there are a growing number of OH&S management system standards in different countries (many based on the adoption or adaption of OHSAS 18001). In addition it shows that such standards are being used in **127 countries**.

The need for an OH&S ISO MSS can be identified at a local, national, regional and global level, and that it applies to both developing and developed countries.

In order to protect their brands, organizations are increasingly demanding information from their suppliers in global supply chains about their OH&S practices. In turn the supplier organizations are looking for an internationally recognized and independent mechanism to demonstrate that they adhere to good OH&S practices. An OH&S ISO MSS would facilitate this.

The proposed OH&S ISO MSS is also needed to support a new area of management systems practice and enable increased compatibility and interoperability of management systems governance and implementation within an organization.

2.3. Need across sectors

Does the need exist for a number of sectors and is thus generic? If so, which ones? Does the need exist for small, medium or large organizations?

The need for the proposed OH&S ISO MSS is generic. It is needed at global, regional, national and local levels, by all sectors, and in all organizations, of all sizes.

An organization can implement an OH&S management system to varying levels of complexity, according to its business requirements (i.e. a small or medium sized enterprise may be able to employ a simpler OH&S management system than the more complex systems that larger organizations may need to use).

The issue of OH&S in small organizations is known to be a problem that is common to many countries, with a disproportionate number of incidents and accidents occurring in such organizations. The promotion of an agreed international standard to such organizations, along with the supporting infrastructure of training courses etc. to support it, may create a level of awareness of health and safety issues in such organizations that other programmes have not yet managed to achieve.

2.4. Importance of the need

Is the need important? Will the need continue? If yes, will the target date of completion for the proposed MSS satisfy this need? Are viable alternatives identified?

The statistics for health and safety incidents and accidents and their related costs continue to be horrific. For example the UK's Health and Safety Executive has the following data for 2010/11:

- **1.2 million** working people were suffering from a work related illness
- **175** workers killed at work
- **115000** injuries were reported (under RIDDOR)
- **200000** reportable injuries (over 3 day absence) occurred
- **26.4 million** working days were lost due to work related illness and workplace injury
- Workplace injuries and ill health (excluding cancer) cost society an estimated **£14 billion** (in 2009/10)

Similarly, the figures from the 2005 statistics released at the 17th World Congress on Safety and Health at Work showed that 2.2 million workers were fatally injured as the result of a work-related accident, which was an increase of 10 % from three years previously. The figures equate to around 6,000 cases per day.

The need for organizations worldwide to improve their OH&S performance is immediate, and will definitely continue into the future. Any tool, such as an OH&S management system, that can help diminish these figures should be supported.

As globalization increases, more consumers (and consequently more customers) are demanding that organizations operate in ethically acceptable ways, including the manner in which they treat their employees. There have been a number of instances where organizations' malpractices have been exposed, leading to significant impact on their brands and loss of business confidence in those organizations.

The need is important to enable organizations to demonstrate that they have adopted good OH&S practices, and that this is able to be verified by independent assessments.

The need will continue, as there is evidence (from the OHSAS Standards and Certificates survey) of a rapidly growing number of organizations establishing formal OH&S management systems, and as those which have already established such systems pursue the cycle of continuous improvement.

The alignment of the OH&S ISO MSS with other ISO MSS (through the use of the Annex SL structure and text) may also encourage organizations to adopt it as part of their overall integrated management system.

There will also be continuing and increasing demand for standards and related guidelines in the OH&S domain as organizations are required to respond to regulatory changes and business requirements for evidence and accountability.

2.5. Determination of the importance of the need

Describe how the need and importance were determined. List the affected parties consulted and the major geographical or economical regions in which they are located.

The need and importance have been voiced since the early 1990s by parties from all geographical and economic regions; however the 1996 ISO OH&S Workshop concluded that there was insufficient support at that time to initiate projects in this field. Since then the advent of the likes of OHSAS 18001, AS/NZ 4801, GBT 28001 have seen a growing number of standards being developed outside of ISO and yet being used internationally.

The extent of the demand is evidenced by the various OHSAS Project Group "Standards and Certificates" surveys that have been conducted in more recent years, of which the 2011 results are provided for information.

2.6. Known or expected support for the proposed MSS

Is there known or expected support for the proposed MSS? List those bodies that have indicated support. Is there known or expected opposition to the proposed MSS? List those bodies that have indicated opposition.

Even before the 1996 ISO workshop on OH&S there were growing demands for a "Requirements" standard on OH&S management systems, to enable organizations to demonstrate that they had adopted good OH&S practices.

The OHSAS "Standards and Certificates Survey" has shown a rapid rise in the rate of use of OHSAS 18001 and equivalent standards over the past 10 years. More importantly, it has shown that the standards are now being used in **127 countries** around the world, which strongly suggests that there would be value to seeking to harmonize OH&S management system requirements into an International Standard, and to share best practices.

It has been noted that there has been consistent opposition to the development of OH&S management system standards both in ISO and in CEN since the early 1990s. The main reason being cited is that each country has its own OH&S regulations, and that is sufficient. In contrast, a key requirement of OHSAS 18001 is that organizations should demonstrate legal compliance, which would support such national or regional (e.g. the EU's SEVESO III) regulations. Additionally, while the regulations may differ from country to country, the OH&S problems, and their potential solutions, remain the same.

The other issue that has consistently been raised in opposition to the development of such standards is that the actual balance of participants in the drafting process does not follow the tripartite approach and would not be adequate. ISO has demonstrated through the development of deliverables such as ISO 26000 that it is willing to facilitate new approaches in its drafting processes, and this issue should no longer be considered as a valid barrier.

(The OHSAS survey has shown that there is significant levels of use of OHSAS 18001 occurring even in those states that have previously expressed such opposition)

A copy of the OHSAS "Standards and Certificates Survey" for data up to the end of 2011 is provided in order to support this proposal.

2.7. Expected benefits and costs to organizations

What are the expected benefits and costs to organizations, differentiated for small, medium and large organizations if applicable? Describe how the benefits and the costs were determined. Provide available information on geographic or economic focus, industry sector and size of the organization. Provide information on the sources consulted and their basis (e.g. proven practices), premises, assumptions and conditions (e.g. speculative or theoretical), and other pertinent information.

Health and safety management enables an organization to achieve effective management of its business and OH&S risks; the protection of those doing work under its control (direct employees as well as contractors); the protection of those affected by its activities (visitors, neighbours, people passing the organization's work sites); and the ability to respond to the challenges of the global environment.

To this end, the benefits of implementing an OH&S management system for small, medium and large organizations in any sector include:

- Common governance, policy and practice benchmarks across geographical boundaries, including different countries, cultures and jurisdictions
- Ability to meet regulatory requirements, including accountability, ethical and corporate governance requirements; regulatory compliance; and practice audits
- Enables compliance with national and international legislation and codes of conduct
- Support of risk management, including emergency planning, and implementation
- Shows a commitment to improved OH&S performance
- Ability to set and assess performance measures for the use of contract service providers, and for inclusion in commercial contracts
- Significant reductions in the number of OH&S incidents and accidents, including a reduction in the costs associated with such incidents or accidents
- Significant reductions in the cost of disruptions to operations
- Reduced insurance premiums
- Use of an OH&S MSS that integrates with, and supports other commonly used MSS, such as ISO 14001 or ISO 9001
- Enables a coordinated, consistent and integrated approach to establishing policy, objectives, targets and implementation techniques across an organisation; thereby minimizing duplication, redundancy, and incompatible processes

- Use of an OH&S management system standard for measuring conformity shows commitment to the wellbeing of workers, neighbours and visitors, as well as to organisational governance, accountability and integrity
- Scalable use of an internationally accepted system to meet business needs, resource availability and risk
- Facilitation of communication between different countries on shared issues, and a forum for articulating common principles, minimum and best practice.

The cost is commensurate with the scope of implementation within each organization and is determined by business need and an assessment of risk.

The cost of implementing an OH&S management system can provide both a short-term and a long-term, positive return on investment. Cost containment can be achieved through integrated implementation of an OH&S management system with other MSS adopted by an organization.

Information on benefits was derived from:

- Those sources identified in 2.5 above.
- Anecdotal information from discussions in meetings of the OHSAS Project Group
- An ad hoc survey by BSI of users of BS OHSAS 18001

2.8. Benefits and costs to other affected parties

What are the expected benefits and costs to other affected parties (including developing countries)? Describe how the benefits and the costs were determined. Provide any information regarding the affected parties indicated.

Affected parties would benefit through:

- the establishment of a worldwide body of knowledge on OH&S management systems
- the sharing of best practice
- the establishment of peer review and other monitoring systems to ensure that the provision of training, certification and accreditation services are of a reasonable standard and are universally applied (through the work of organizations such as the IAF or the IPC)
- the establishment of formal complaints handling processes by the certification and accreditation bodies (through the use of ISO/IEC 17021)

The costs that other affected parties experience would be lower using an OH&S ISO MSS than they would be in developing and implementing their own standards, which would add additional development, implementation and training costs in addition to the costs their industries would pay for not complying with an international OH&S management standard.

2.9. Expected value to society

What will be the expected value to society?

Ultimately the widespread use of effective OH&S management systems will benefit society

- by reducing the number of incidents and accidents;
- by reducing disruptions to operational processes

- by reducing the need for emergency medical care provision (both at the workplace and at hospitals)
- by reducing the need for long term care for those unable to return to work following an accident
- by preventing the removal of people from the workforce
- by reducing the costs of incidents and accidents or of disruptions.

The OH&S ISO MSS should deliver significant value and performance improvements to users, including better risk management, transparency, consistency and sustainability.

It should be recognised as a useful tool by regulators to clarify expectations and improve consensus on requirements for good governance and the optimal way forward in the face of conflicting requirements (such as short term versus long term goals, cost control, service delivery and risk management).

For organizations operating in high risk OH&S environments, a joined-up, optimized and sustainable management system is essential as a means of assuring both internal and external stakeholders that they are managing their risks appropriately, safely and efficiently. This is an increasingly important requirement in the current climate of investment concerns, long term sustainability/ environmental pressures, resource constraints, fast changing technologies and societal or customer demands.

2.10. Other Risks

Have any other risks been identified (e.g. timeliness or unintended consequences to a specific business)?

No other risks have been identified or are anticipated.

3. Principle 2 - Compatibility

3.1. Overlap with other ISO or non-ISO standards

Is there potential overlap or conflict with other existing or planned ISO or non-ISO international standards, or those at the national or regional level? Are there other public or private actions, guidance, requirements and regulations that seek to address the identified need, such as technical papers, proven practices, academic or professional studies, or any other body of knowledge?

There would be overlap between the proposed OH&S ISO MSS and many existing international or national standards (e.g. OHSAS 18001, AS/NZ 4801, GB T28001, ANSI Z10), but no conflicts with them.

There are many other public or private actions, guidance, requirements and regulations that seek to address the identified need, such as technical papers, proven practices, academic or professional studies, or any other body of knowledge (e.g. the ILO's OSH Guidelines document).

The purpose of the OH&S ISO MSS would be to harmonize such documents and activities etc. and to share best practices.

3.2. Compatibility with other ISO or non-ISO standards

Is the MSS or the related conformity assessment activities (e.g. audits, certifications) likely to add to, replace all or parts of, harmonize and simplify, duplicate or repeat, conflict with, or detract from the existing activities identified above? What steps are being considered to ensure compatibility, resolve conflict or avoid duplication?

The proposed OH&S ISO MSS is likely to harmonize, add to, replace, duplicate or repeat (parts of) the existing activities identified in 3.1 above, but would not conflict or detract from them.

It is expected that the proposed OH&S ISO MSS would supersede many of the existing activities, so removing the initial duplication or repetition of them.

Similarly, the related conformity assessment activities would be expected to replace those against the identified existing activities.

The proposed OH&S ISO MSS would be compatible with, and support, the requirements of other ISO MSS such as ISO 9000 or ISO 14000 (particularly through the use of the Annex SL "High Level Structure" and text). It could be implemented as part of an organization's overall management system, and/or could be implemented in conjunction with any one or more other ISO MSS.

Compatibility would be ensured through a process of validation and verification against the existing MSS's during the development of the OH&S ISO MSS, and through active liaison with relevant internal (e.g. ISO/TC 176, ISO/TC 207, ISO/CASCO, the JTCG) and external parties. This should prevent any conflict and avoid duplication.

3.3. Proliferation of MSS

Is the proposed MSS likely to promote or stem proliferation of MSS at the national or regional level, or by industry sectors?

It is likely that the proposed OH&S ISO MSS would stem proliferation of MSS's at the national or regional level, or by industry sectors.

The proposed OH&S ISO MSS is likely to be adopted as an identical standard (allowing for translation differences) in national jurisdictions.

There is no reason for, or advantage to be gained by different jurisdictions or sectors developing a different OH&S management system standard, although supporting products could be developed at a regional or national level to aid implementation and to advise on regional or national regulations.

4. Principle 3 – Topic coverage

4.1. Application of the MSS for a single specific sector

Is the MSS for a single specific sector?

The proposed OH&S ISO MSS is not intended for any single specific sector. It would be applicable to all sectors.

4.2. Referencing or incorporating existing ISO MSS

Will the MSS reference or incorporate an existing, non-industry-specific ISO MSS (e.g. from the ISO 9000 series of quality management standards)? If yes, will the development of the MSS conform to the ISO/IEC Sector Policy (see 6.8.2 of ISO/IEC Directives, Part 2), and any other relevant policy and guidance procedures (e.g. those that may be made available by a relevant ISO committee)?

The proposed OH&S ISO MSS is likely to reference (in its Bibliography):

- ISO/IEC Directives, Part 1, Procedures Specific to ISO, 2012, *Annex SL*
- ISO 14001 *Environmental management systems*
- ISO 9001 *Quality management systems*
- ISO/IEC Guide 73 *Risk management - Vocabulary*
- ISO 31000 *Risk management.- Principles and guidelines*
- ISO 19011:2011 *Guidelines for auditing management systems*

The development of the proposed OH&S ISO MSS would conform to the ISO/IEC Sector Policy (see 6.8.2 of ISO/IEC Directives, Part 2, 2001), and any other relevant policy and guidance procedures such as those provided by a relevant ISO technical committee.

4.3. The need for particular sector-specific deviations from a generic MSS

What steps have been taken to remove or minimize the need for particular sector-specific deviations from a generic MSS?

The scope of the proposed OH&S ISO MSS is unlikely to require sector-specific deviations from the generic MSS. However, the ISO PC that is given responsibility for this project should work through liaison with other internal and external parties to achieve this goal.

Annex SL, Appendix 2 of the *Supplement to ISO Directives Part 1* (High level structure, identical core text and common terms and core definitions for use in Management Systems Standards) should be used in the development of the proposed OH&S ISO MSS (which is reflected in the supporting preliminary draft).

5. Principle 4 – Flexibility

Will the MSS allow an organization competitively to add to, differentiate or encourage innovation of its management system beyond the standard?

The proposed OH&S ISO MSS would enable an organization to implement an OH&S management system in a scalable way according to: its regulatory context; its size and complexity; the nature of its activities, products and services; its assessment of its risks; or its organizational culture. This may be the case in particular for small and medium-sized enterprises.

An organization can choose to go beyond a minimum level of conformance, and reach a higher level of capability which would improve overall organizational effectiveness and demonstrate continuous improvement. Implementation can include innovation through:

- the use of less hazardous materials, products or processes
- improved design of work processes
- other techniques that result in improved OH&S performance.

The drive for higher conformance and/ or innovation can be for competitive advantage, market differentiation, or excellence in service delivery – depending on the sector in which the organization operates.

There are also opportunities for an organization to incorporate contractors, suppliers, customers or trading partners within the scope of its OH&S management system, thereby improving supply chain performance, business performance, or customer engagement – any of which may result in competitive advantage.

6. Principle 5 - Free Trade

6.1. How the MSS facilitates or impacts global trade

How would the MSS facilitate or impact global trade? Could the MSS create or prevent a technical barrier to trade?

By reducing the number of different national OH&S management system programmes, the proposed OH&S ISO MSS could facilitate global trade, and could remove existing barriers to trade.

6.2. Possible technical barrier to trade for small, medium or large organizations

Could the MSS create or prevent a technical barrier to trade for small, medium or large organizations?

The proposed OH&S ISO MSS could facilitate trade for organizations of all sizes by providing:

- the implementation benchmark for global or local certification against the OH&S ISO MSS
- a qualification framework for tendering, or qualification for preferred provider status.

The proposed OH&S ISO MSS would not create a technical barrier to trade for small, medium or large organizations.

6.3. Possible technical barrier to trade for developing or developed countries

Could the MSS create or prevent a technical barrier to trade for developing or developed countries?

The proposed OH&S ISO MSS could facilitate trade for developed or developing countries in the same way as indicated in 6.1 and 6.2 above.

6.4. Use of the proposed MSS in government regulations

If the proposed MSS is intended to be used in government regulations, is it likely to add to, duplicate, replace, enhance or support existing governmental regulations?

The proposed OH&S ISO MSS is likely to support existing governmental regulations, as many such regulations now require organizations to establish formal OH&S management systems. Consequently it could help organizations comply with, and demonstrate their compliance to, such governmental regulations.

While national legislation for OH&S management usually establishes the requirements and the body responsible for oversight; the proposed OH&S ISO MSS could provide the basis for an organization's OH&S policy, principles and implementation techniques.

7. Principle 6 - Applicability of Conformity

7.1. Methods of demonstrating conformance

If the intended use is for contractual or regulatory purposes, what are the potential methods to demonstrate conformance (e.g. first party, second party or third party)? Does the MSS enable organizations to be flexible in choosing the method of demonstrating conformance, and to accommodate for changes in its operations, management, physical locations and equipment?

The proposed OH&S ISO MSS:

- could be used for contractual or regulatory purposes in some jurisdictions within some countries
- would allow for first, second, or third party methods to demonstrate conformance
- would enable organizations to be flexible in choosing the method of demonstrating conformance, and to accommodate for changes in their operations, management, physical locations and equipment

7.2. Benefits and costs of registration/certification

If third-party registration/certification is a potential option, what are the anticipated benefits and costs to the organization? Will the MSS facilitate joint audits with other management system standards or promote parallel assessments?

For the proposed OH&S ISO MSS the primary benefits of third party certification include:

- Increased customer and other stakeholders' confidence in organizations OH&S practices, due to the independence of the certification audits
- improved communications on OH&S management to customers, contractors, suppliers and regulators, as more organizations become familiar with the OH&S ISO MSS
- improved efficiency as the global OH&S ISO MSS infrastructure expands, e.g. through the provision of standardized auditor training courses, the availability of knowledgeable and experienced consultants, a diversity of certification bodies etc.

The costs of third-party registration/certification include:

- employee training
- audit preparation costs
- audit costs
- registration fees.

The liaison arrangements between the OH&S PC and other ISO and IEC technical committees or other external organizations, and the use of the Annex SL "High Level Structure" and text, will ensure that the proposed OH&S ISO MSS is fully aligned with as many other MSS as possible (and particularly ISO 14001), to enable joint audits wherever possible.

8. Principle 7 - Exclusions

Does the proposed purpose or scope include product (including service) specifications, product test methods, product performance levels, or other forms of guidance or requirements directly related to products produced or provided by the implementing organization?

The proposed purpose or scope of the OH&S ISO MSS does not include any type of guidance or requirements for products or services produced or provided by an implementing organization.

9. Principle 8 - Ease of Use

No questions directly refer to the principle 8 "ease of use", but it should guide the development of the deliverable

Most technical standards require a degree of technical competence in their field to understand them, whereas anyone may be appointed as a manager and have to deal with a formal management system; consequently it is essential that the proposed OH&S ISO MSS be written in a style that is generally understandable to anyone in such a role, and that it can be translated without loss of any of the concepts underlying its requirements. The ISO PC given responsibility for this project would need to plan how to achieve the required "ease of use" for the proposed OH&S ISO MSS.

Withdrawn certificates

Item	Reason	Number of withdrawn certificates
5.3.1	Organization failed re-certification audit	89
5.3.2.	Organization decided to discontinue certification because:	
	5.3.2.1 Return on investment was insufficient	40
	5.3.2.2 No business advantage resulted	42
	5.3.2.3 Other reasons	2483
	Total	2654