

# ISO 10377, Guide to Suppliers: National Adoption of Canada

## Review of Comments Received

**WEBINAR**

**September 30, 2016**



# Agenda

- Canadian Adoption of ISO 10377
  - Background & Overview of Standard
  - Objectives & Goals
  - Workplan/Timelines
- Preliminary Review Outcomes
  - Process Followed
  - Engagement Level
  - Overview of Comments Received
  - Consideration of Comments and process used for disposition of Comments
- Next Steps
- Questions

# **CANADIAN ADOPTION OF ISO 10377**

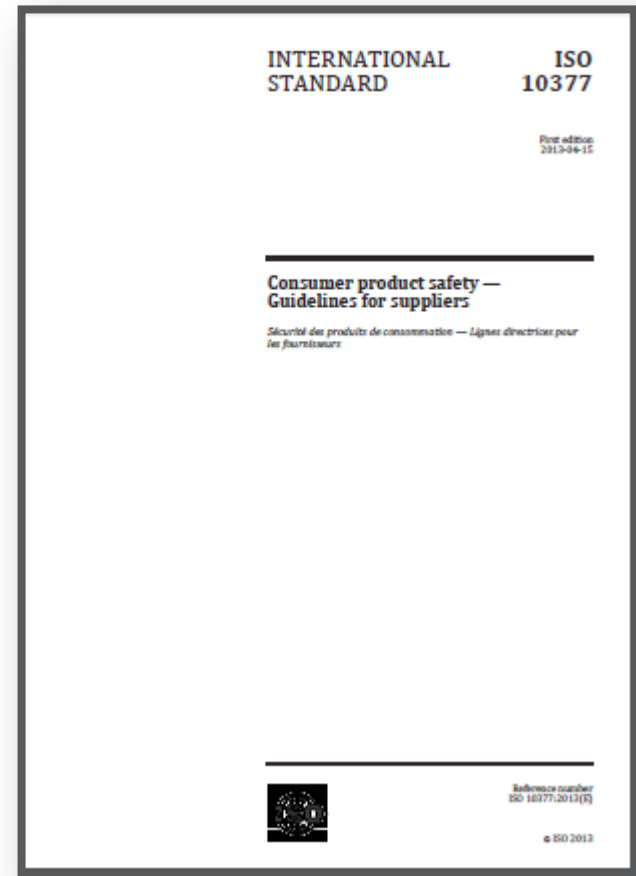
# Background

- Canada was a major contributor to the development of ISO 10377 – Canada held International TC Chair Position.
- Document seen as important to Canadian regulators and industry.
- At request of regulators, SCC issued Request for Proposal for the adoption of ISO 10377 as a National Adoption of Canada (NAC).



# ISO 10377 – Consumer Product Safety – Guidelines for Suppliers

- Developed in response to requirements around the world for suppliers to place only safe products on the market.
- Intended to fill a gap for suppliers due to:
  - limited experience;
  - few available resources; and
  - lack of a practical reference document explaining the process.
- Standard provides practical guidance for suppliers of all sizes.
- Intended for SMEs and suppliers that do not design or produce products, but are still responsible for their safety.



# Desired Outcomes/Goals

This standards project has two main objectives:

1. To *pilot a virtual standardization project*, as a means of:
  - reducing barriers to access;
  - providing a more open and transparent process;
  - achieving a more timely, efficient and innovative process;
  - increasing engagement beyond traditional experts; and
  - ensuring cost efficiencies in adopting ISO 10377 for Canada.
2. To *adopt ISO 10377 for use in Canada* incorporating necessary Canadian national differences (if any) with a particular focus on small and medium sized enterprises (SMEs).



# Work Plan for CAN/UL10377

- ~~1. Develop SCC approved Methodology and Communications strategy~~
- ~~2. Identify key stakeholders and online channels for engagement.~~
- ~~3. Open Work Areas in CSDS to facilitate review and virtual collaboration.~~
- ~~4. Execute communications strategy--ongoing.~~
- ~~5. Webinar to explain process, timelines, scope and work plan for Virtual STP.~~
- ~~6. Collect stakeholder input / comments re existing ISO 10377 document.~~

- 7. Work with a few stakeholders to review / resolve comments.  
– Webinar to review proposed changes & disposition of comments*
- 8. Revise & finalize draft standard, send for ballot & public review.*

9. Further steps as required by SCC and UL regulations.

 10. Standard issued.

# 13077 Projected Timetable

**GOAL:** Review and publish ISO 13077 as a National Adoption of Canada (NAC) using a virtual adoption process

## Milestone dates to get there:

- Project Start Date *April 2016 Complete*
- UL submit *Notice of Intent* to SCC *Complete*
- Develop Methodology and Communication Strategy *Complete*
- Determine Sub-topics to facilitate targeted participation *Complete*
- Compile list of Canadian stakeholders to engage *Complete*
- Use online channels to solicit broad engagement *Ongoing*
- Send letters to impacted Canadian stakeholders *Complete*
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- Virtual Preliminary Review by anyone interested *Complete*
- Resolve Preliminary Review Comments *Complete*
- *2<sup>nd</sup> Webinar to discuss proposed changes* *Today*
- *Public Review (30 days)* *Ongoing –Ends November*
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- Submit to SCC for approval *End November*
- Standard Published *Dec 2016*





# **PRELIMINARY REVIEW OUTCOMES**

# Topic Areas

- To facilitate participation, the standard was sub-divided into Parts (or topic areas).
- Intended to solicit **targeted feedback** and **encourage participation** by subject matter experts and stakeholders, with **specific interest or expertise**.
- Stakeholders were able to submit comments regarding:
  - A specific topic area;
  - Several topic areas; or
  - The entire document

## Topic Areas:

**Topic 1: General** (Scope, Definitions, Principles, General Requirements)

**Topic 2: Design & Production Safety**

**Topic 3: After-market Safety**

**Topic 4: SME Information & Guidance**

**Topic 5: Risk evaluation & Product Safety Management**

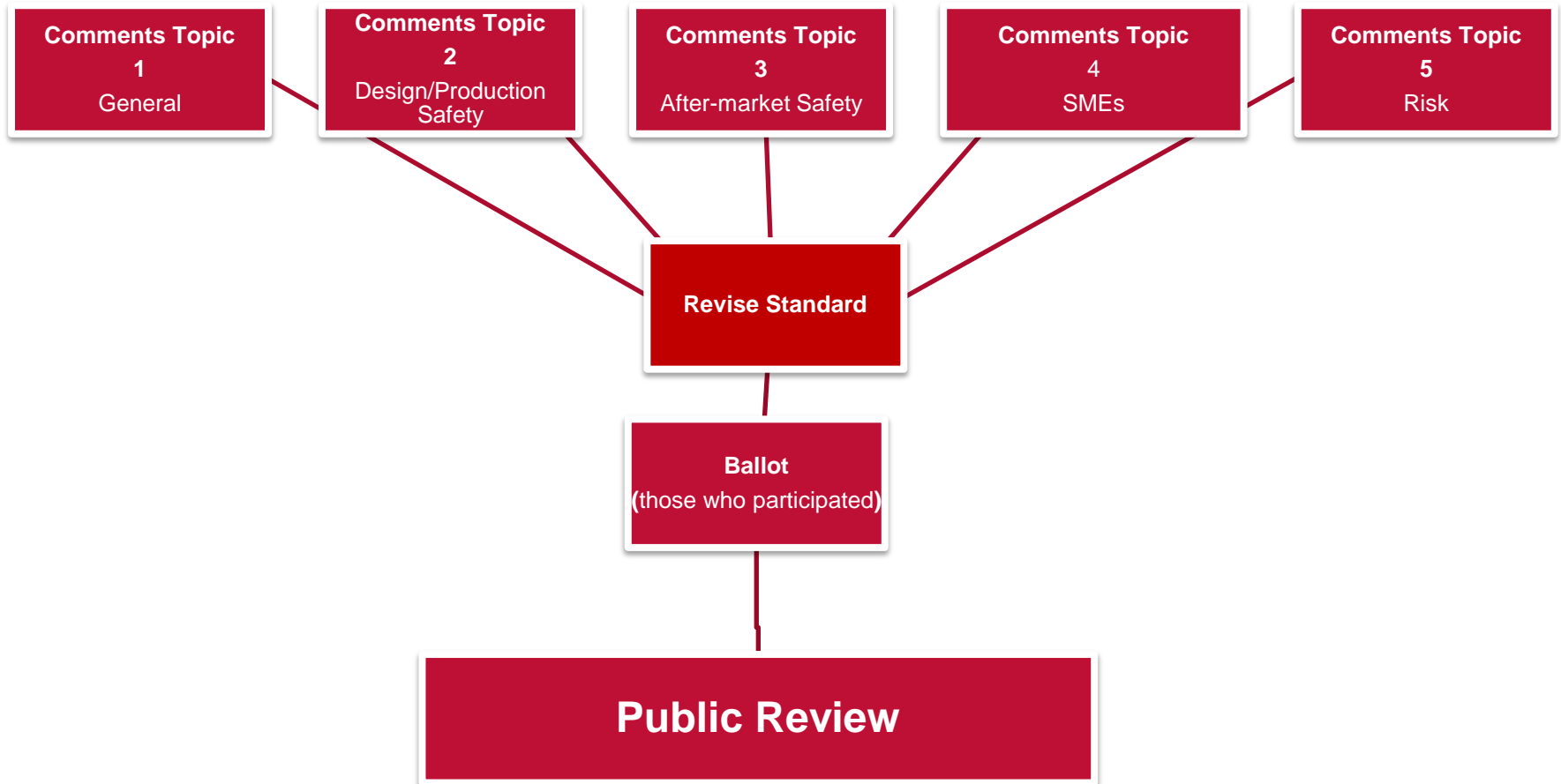


# Virtual Process Methodology

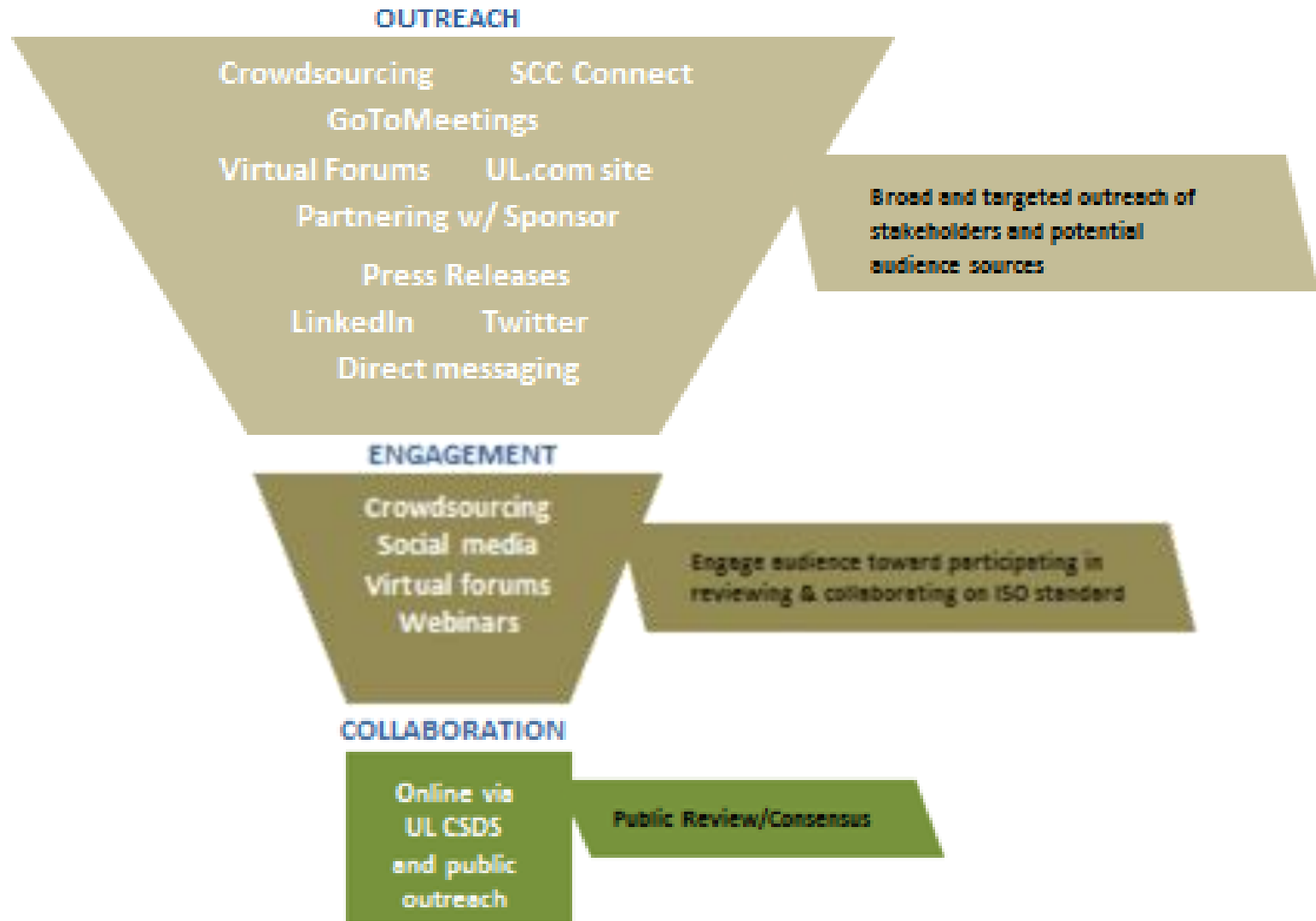
- Traditional development methodology with modifications will be used:
  - virtual process using social media / online channels to solicit engagement in addition to targeted key stakeholder engagement;
  - Channels include crowdsourcing, microblogging, social media, virtual forums and communities, and other technologies;
  - comments will be collected virtually using the UL Online Collaborative Standards Development System (CSDS) platform;
  - broad, ongoing engagement of interested stakeholders rather than forming a specific technical committee;
  - standard will undergo a preliminary review immediately to identify possible Canadian national differences;
  - Standard will be balloted by those who participated, with a focus on maintaining a balance of interests;
  - Reduced timelines given virtual nature of process to realize efficiencies;



# Process Flow Chart



# Communications Strategy



# Stakeholder Engagement

## OUTREACH

Crowdsourcing    SCC Connect  
GoToMeetings  
Virtual Forums    UL.com site  
Partnering w/ Sponsor  
Press Releases  
LinkedIn    Twitter  
Direct messaging



**500+** communications pieces sent to potential stakeholders

**277** people contacted directly

## ENGAGEMENT

Crowdsourcing  
Social media  
Virtual forums  
Webinars



**200** people who responded to us with interest in the standard

**142** people who said they were interested in participating

## COLLABORATION

Online via  
UL CSDS  
and public  
outreach



**38** people who submitted comments

**32** included as voting members balloting standard



# Comments Received

Topic Area	# Comments Received	# Support with no changes	# Comments questions	Proposed Changes		
				# Acknowledged no changes to document	# Resulted in National Difference	# Proposals sent to ISO no changes
<b>Topic 1:</b> General	55	20	14	12	6	3
<b>Topic 2:</b> Design & Production Safety	37	16	9	8	1	3
<b>Topic 3:</b> After-market Safety	25	20	3	2	-	-
<b>Topic 4:</b> SME Info & Guidance	14	12	-	-	-	2
<b>Topic 5:</b> Risk & Product Safety Mgmt	17	13	-	1	-	3
<b>Total</b>	<b>148</b>	<b>81</b>	<b>26</b>	<b>23</b>	<b>7*</b>	<b>11*</b>

\* The total number is less since there were duplicative comments received that either resulted in a single change or a single proposal being sent to ISO



# WTO TBT Agreement Obligations

- The World Trade Organization (WTO) and the WTO Technical Barriers to Trade Agreement (TBT Agreement) place obligations on Standards Development Organizations (SDOs).
- Standards developed, adopted and published by SDOs must:
  - support global trade and
  - must be globally relevant.
- The development and/or adoption of a standard that fails to meet WTO requirements is open to being challenged as creating a barrier to free trade.





# Process Used to Consider Comments Received

- Proposed changes were discussed with the Canadian International Chair of the ISO 10377 committee and Health Canada.
- Recommended dispositions were based on the following characteristics of a globally relevant standard:
  1. Effectively respond to regulatory and market needs (in the global marketplace);
  2. Respond to scientific and technical developments in various countries;
  3. Not distort the market;
  4. Have no adverse effects on fair competition;
  5. Not stifle innovation and technological development;
  6. Not give preference to characteristics or requirements of specific countries or regions when different needs or interests exist in other countries or regions;
  7. Be performance-based as opposed to design-prescriptive.

*Source: Document G/TBT/1/Rev.8, formerly referred to as Annex IV to the Second Triennial Review of the Technical Barriers to Trade Agreement.*



# Criteria Used to Consider National Differences

## *Fundamental rationale for national differences in international standards*

- Differences in legal and regulatory requirements
- Differences in technical infrastructures
- Differences in climatic conditions

*Source: IEC Council Board Decision on Global relevance*



# Comments Accepted in Principle or as National Differences

**4** national differences were identified as a result of preliminary review comments

- All of the changes were as a result of *differences in the legal and regulatory requirements in Canada*.
- These national differences have been indicated in the document by the designation “DV”.

**10** recommendations will be forwarded to the ISO committee responsible for the standard for consideration in the next revision of ISO 10377

- Although these comments were accepted in principle, they did not result in national differences.

# Comments Forwarded to ISO for their consideration

1. Recommendation to remove reference to ISO 31000 in **bibliography**.
2. Recommendation that section 2.27 **traceability** be changed from tracking the location of the product or component to the source of the product or component.
3. Recommendation that additional clarification be added and reference to “**public recall**” be broadened to include additional “corrective actions” to allow for additional outcomes.
4. Recommendation that section 5.3.3 **Unforeseeable misuse** be amended to include feedback mechanisms to provide ongoing evaluation to identify instances in addition to patterns of misuse.
5. Recommendation that ANSI Z535 be considered as an additional reference in **section 5.3.5**.



# Comments Forwarded to ISO- Cont'd

6. Recommendation that these questions be added to **Appendix B**:
  - have they properly insured themselves for the risks associated with their products?
  - have they tried to erroneously reassign risk through contracts for which they are accountable?
  - Have they created gaps in risk management through different contract scopes?
7. Recommendation that **Appendix B** be amended to include additional guidance regarding assembly of products.
8. Recommendation that **Table C.1 and 2** be amended to include not only direct hazards that occur during 'normal' operation or foreseeable misuse / anticipated accidents but functional hazard analysis to evaluate the effectiveness of control measures.
9. Recommendation that design process and assessment be included as part of the **Product Safety Plan**.
10. Recommendation that section 5 – **product design** be expanded and additional content for Safety in Production be added to help further standardize quality management systems.



# National Differences

1. In the Introduction section added “*provinces and territories*” after the word “countries” in the beginning of the document to make it clear that provincial and territorial requirements must be also respected. This was intended to also cover comments related to provincial qualifications for individuals and other comments related to specific legislative or regulatory requirements.

It is important that suppliers maintain an awareness of and comply with the laws and regulations of the countries, *provinces and territories* where the products are manufactured, imported, distributed or sold.

2. Section 4.6.1 added “*installing*,” after the word “assembling”

In addition, suppliers should provide product information to consumers that will enable consumers to make informed decisions when purchasing a consumer product and to fulfil their responsibilities in using, assembling, *installing* maintaining and disposing of the product in a safe manner.



# National Differences - Continued

3. Section 4.6.3 added “*installation*,” after the word “assembly”.

Instructions for assembly, *installation*, intended and safe use, maintenance, storage, life span and disposal of a consumer product should be provided to consumers.

4. Section 5.1 modified by replacing “injury to consumers” with “*harm to consumers*”.  
- ~~injury to consumers~~ - *harm to consumers*;



# Comments Acknowledged but No changes made to the Standard

General rationale for comments not resulting in national differences:

- The guidance standard is not intended to apply to individual cases; rather it is intended to provide generalized guidance.
- The guidance standard is not intended to deal with specific products or categories of products but to apply to all products.
- The guidance standard includes language that local legislative and regulatory requirements be met, additional language was added to include provincial and territorial requirements.
- Questions or comments about the process were responded to in the disposition document.





**NEXT STEPS**

# Ballot and Public Review

1. Everyone has been set up in CSDS with access to:
  - Each of the work areas
  - All comments submitted
  - The disposition of comments
  - The original and revised documents
2. Everyone is encouraged to log into CSDS and review the revised document, review comments received and the disposition.
3. All those who expressed interest will be notified of the ballot and public review of the documents.
  - If you are a voting member log on to CSDS and cast your ballot and comments if any.
  - If you are not a voting member you can log onto CSDS and submit any further comments you may have. CSDS ensures an open and transparent process; all comments are visible to all participants.



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# QUESTIONS

# Thank you!



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**FURTHER INFORMATION**

# Information about Participation

More information on participation and the virtual approach can be found on the UL website:

<http://ulstandards.ul.com/downloads/canadian-national-adoption-of-iso-10377/> (English)

<http://ulstandards.ul.com/downloads/adoption-nationale-du-canada-de-la-norme-iso-10377/> (French)

If you have any questions regarding this project, please feel free to contact us at [UL.StandardsSurvey@ul.com](mailto:UL.StandardsSurvey@ul.com) .



# Collaborative Standards Development System (CSDS)

- CSDS is UL's web-based standards development tool used to submit proposals, commenting, and voting
- CSDS is available 24/7
- Open to anyone interested in UL's standards development process
- All proposals are viewable by any CSDS user; making UL's process fully transparent

The screenshot shows the login page of the UL's Collaborative Standards Development System (CSDS). At the top left is the UL logo. The page title is "UL's Collaborative Standards Development System (CSDS)". Below the title is a navigation menu with items: Proposals, STP Info, General Info, UL Canada, Links, and Help. The main content area contains a "Login" section with a heading "Login" and a sub-heading "The Username is typically your email address. The password is case sensitive and must be 6-12 numbers and/or letters." There are two input fields: "Username" and "Password". Below the password field is a link "Forgot Your Password?". To the right of the login form is a "Not a C!" section with a red star icon and a list of links: "UL", "LE", "UL", "PL", "UL", "SL", "PL".

The screenshot shows the user interface of the UL's Collaborative Standards Development System (CSDS) after a user is logged in. At the top left is the UL logo. The page title is "UL's Collaborative Standards Development System (CSDS)". Below the title is a navigation menu with items: Proposals, STP Info, General Info, UL Canada, Links, and Help. The main content area shows a search bar with "Search Type" and "Search Text" fields. Below the search bar is a "User Home" section with a sub-heading "User Home - Work Areas for MARIA IAFANO - UNDERWRITERS LABORATORIES INC". There are several tabs: "Work Areas", "Meetings", "Proposal Requests", "Calendar", and "My STPs". The "Work Areas" tab is selected. Below the tabs is a "Select One:" section with three radio buttons: "All My Work Areas", "All My STP Work Areas" (selected), and "All My Archived Work Areas". Below that is a "Select All That Apply:" section with four checkboxes: "Have Not Voted", "Have Not Commented", "Vote Submitted", and "Comments Submitted". Below the checkboxes is a table with two columns: "Name" and "Type". The table contains two rows of data:

Name	Type
UL 1123 Ed. 7 - Preliminary Review -- Opened 2013-04-12 <sup>STP</sup>	General
UL 1123 Ed. 7 - Preliminary Review - UL 1123 Label Proposal - Opened 2016-05-03 <sup>STP</sup>	General





# ASSISTANCE WITH USING CSDS

At any time you can obtain guidance regarding CSDS:

## On YouTube at:

- What is CSDS?

[https://youtu.be/1pqqML2BiLo?list=PL19IE6OEt6UedLL6bpYCzJEh\\_5pYxuSh9](https://youtu.be/1pqqML2BiLo?list=PL19IE6OEt6UedLL6bpYCzJEh_5pYxuSh9)

- Submitting a Proposal Request in CSDS

[https://youtu.be/0\\_TMA50dDPE?list=PL19IE6OEt6UedLL6bpYCzJEh\\_5pYxuSh9](https://youtu.be/0_TMA50dDPE?list=PL19IE6OEt6UedLL6bpYCzJEh_5pYxuSh9)

- Viewing Proposals in CSDS

[https://youtu.be/0\\_TMA50dDPE?list=PL19IE6OEt6UedLL6bpYCzJEh\\_5pYxuSh9](https://youtu.be/0_TMA50dDPE?list=PL19IE6OEt6UedLL6bpYCzJEh_5pYxuSh9)

- Voting and Commenting in CSDS

[https://youtu.be/rZmm0AgPyvw?list=PL19IE6OEt6UedLL6bpYCzJEh\\_5pYxuSh9](https://youtu.be/rZmm0AgPyvw?list=PL19IE6OEt6UedLL6bpYCzJEh_5pYxuSh9)

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