

Proposal for Amendments to the Legal Inspection Requirements for Belts for Work Positioning and Restraint and Work Positioning Lanyards, Full-body Harnesses and Safety Belts (Fasten Type)

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs

Background:

1. Belts for work positioning and restraint and work positioning lanyards, full-body harnesses and safety belts (Fasten Type), whether domestically produced or imported from abroad, must be in compliance with the inspection requirements before they are transported out of production premises or released from the Customs.
2. With a view to enhancing the performance of belts for work positioning and restraint and work positioning lanyards and full-body harnesses, the Bureau of Standards, Metrology and Inspection (BSMI) proposes to update the inspection standards. CNS 7534 published in 2015 will be adopted for belts for work positioning and restraint and work positioning lanyards. CNS 14253-1 and CNS 14253-6 published in 2014 will be adopted for full-body harnesses.
3. The BSMI also proposes to adopt the procedure of Type-Approved Batch Inspection (TABI) in place of Batch-by-batch Inspection to speed up customs clearance. The alternative procedure is still Registration of Product Certification (Modules II+IV, II+V, or II+VII). Business operators can choose the procedure appropriate for them depending on their needs.

Proposed date of implementation: 1 February 2023

Products (HS/CCCN codes) covered and their applicable inspection standards: (changes made are underlined)

Description of Goods	Inspection schemes	Inspection Standards	Reference C.C.C. Code (the first 6 digits are the same as HS Code)
<u>Belts for work positioning and restraint and work positioning lanyards (Inspection scope: assembled finished product)</u>	<u>Type Approved Batch Inspection</u> or Registration of Product Certification (Modules II+IV, II+V, or II+VII)	<u>CNS 7534:2015</u>	6307.90.90.90-1A
<u>Full-body harnesses (Inspection scope: CNS 14253-1 "Class A full-body harnesses," and "energy absorbing lanyard" or "Lanyards and energy absorbers" assembler)</u>		<u>CNS 14253-1:2014</u> <u>CNS 14253-6 Section 6.2:2014</u>	6307.90.90.90-1E
<u>Safety belts (fasten type)</u>		CNS 6701:1996	6307.90.90.90-1B

Description of the two kinds of conformity assessment procedures

1. Registration of Product Certification (RPC) Scheme: Modules II+IV, II+V, or II+VII

For products subject to Modules II+IV, II+V, or II+VII procedures, not only the products are required to be type-tested (Module II) by the BSMI or BSMI-designated testing laboratories, but the quality management systems of the production premises must be audited under Module IV (Full Quality Management System), Module V (Production Quality Management System) or Module VII (Factory Inspection).

For Module IV and Module V, a registration certificate issued in accordance with CNS 12681 (ISO 9001) is required to be obtained from certification bodies recognized by the BSMI. As for Module VII, a factory inspection report issued by the BSMI or BSMI-recognized factory inspection bodies is needed.

In addition, a declaration of conformity-to-type is also required to ensure that the mass-produced commodities are in conformity with that shown in the type-test report.

After being certified and registered by the BSMI, products will be allowed to use the Commodity Inspection Mark with the letter 'R' and the identification number given by the BSMI. Additionally, these products can clear the customs directly without any further inspection if not being sampled by RPC border check procedures. The application fee and annual fee for RPC are both NT\$5,000 (about US\$170) for each certification, and an RPC certificate is valid for 3 years. If there are any serial products, an extra NT\$3,000 (about US\$100) of application fee will be charged for every application in each certification. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

2. Type-Approved Batch Inspection (TABI) Scheme

Under this scheme, manufacturers or importers shall have their products type-tested by BSMI or BSMI-designated testing laboratories, and then file an application for type approval with the BSMI or its branches.

After manufacturers or importers have obtained Type Approval Certificates, they are required to file an application for batch inspection with the BSMI each time before their products are transported out of the production premises or arrive at the port of entry. The BSMI will then perform inspection with simplified procedures. Additional samples may be required for further testing if it is deemed necessary. The application fee for a type approval is NT\$3,500, and a type approval certificate is generally valid for three years.

Locations to apply for type testing:

BSMI, Taichung Branch of BSMI, or BSMI-designated testing laboratories.

Time required for Registration of Product Certification:

14 working days (not including the time for corrective actions by the applicant due to deficiencies in the documents or samples. An extra 7 working days may be required for additional tests).

Related requirements:

1. The inspection standards of the commodities listed in the table shall be the version published in this announcement. If any updated version is available, the BSMI shall publish the implementation date of the updated version in further announcements.
2. The C.C.C. Codes listed in the table are used for reference only. Products listed shall still comply with the requirements before entering into the market, even though their C.C.C. Codes are identified differently by the Customs Administration, Ministry of Finance or Bureau of Foreign Trade, Ministry of Economic Affairs.

Others:

Please refer to the "Directions Governing the Inspection of Personal Protective Equipment" for more detailed explanation about the processes.