

## Draft Future Topics

OSHA periodically reviews the NRTL Program to identify unclear guidance, changes in requirements, and private sector market influence on the program. As a result of recent program reviews, OSHA has identified the following areas that it is considering for future stakeholder forums. OSHA seeks stakeholder input on these topics as well as other topics needing discussion.

### Harmonization of Requirements

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Discuss harmonization of the NRTL requirements with ISO 17025, ISO 17065, and other ISO standards and how best to do this:

1. Would the NRTLs prefer a supplement to be used in conjunction with the ISO standards, or should it OSHA develop specific document that refers back to the specific clauses in the ISO standards?
2. Should OSHA mandate that NRTLs must be independently (ANSI/A2LA/ILAC etc.) accredited to ISO 17025, ISO17065 & other applicable ISO standards? If so, would the NRTLs be willing to share those audit reports in their entirety with OSHA during onsite audits or upon request?
3. Do the NRTLs have all of their sites independently accredited to the ISO standards? If not, what is an estimate of the total financial burden in doing this?

### Contract Auditors

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What are the NRTL's feelings about making greater use of independent contract auditors either contracted directly with OSHA and/or through organizations like ANSI, A2LA, or IAS etc.?

### Factory Inspections

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Discuss requirements for factory inspections:

1. Currently established "quarterly" schedule vs. more of a risk-based approach.
2. Are inspections pre-arranged or unannounced?
3. How would the NRTLs feel about standardizing inspection content and processes (i.e., OSHA publishes more detailed requirements that the NRTLs must meet or adoption of a published standard(s) if such a standard is available)

### Supplemental Programs

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Discuss NRTL Supplemental programs:

**Note:** This document is an early draft of requirements OSHA may ask NRTLs and NRTL applicants to follow if OSHA revises its NRTL policies. OSHA intends that the regulated community use this draft summary solely to get an idea of the general direction OSHA may be heading in terms of its policy. The regulated community should not rely on the draft summary for any other purpose, and should not assume that any of the draft requirements will be implemented, or, that if a worksheet or process is implemented, that it will be in the form, or even contain identical substantive material, as that contained in the draft summary. OSHA is still developing its thoughts on its policies, and views its sharing of the draft summary with the regulated community as one step in that process. The draft summary has no legal effect, nor is it an expression of OSHA policy.

1. Are they meeting the NRTL's and client's needs?
2. Are they too burdensome, or are they not stringent enough?
3. Two years in, is SNAP meeting everyone's needs?
4. Are there any improvements to SNAP that you would like to see implemented?
5. Are manufacturers looking for other solutions that are not or cannot be addressed by the existing supplemental programs?
6. Regarding in-house capability, how can we make this more accommodating while maintaining standards?

### **Certification Marks**

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Discussion of the need to implement a unique identifier to be appended to the NRTL's certification mark to signify that the product has been tested under the NRTL's scope (similar to the "C" mark for Canada)

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