



AMERICAN SOCIETY OF SAFETY ENGINEERS
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AMERICAN INDUSTRIAL HYGIENE ASSOCIATION
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Fairfax, Virginia 20031 USA

July 25, 2007

NEN Management Systems
Nederlands Normalisatie-instituut
Vlinderweg 6, 2623 AX
Delft, NL

Dear Ladies and Gentlemen,

Re: Systematic Review of ISO 19011

The American Society of Safety Engineers (ASSE) and the American Industrial Hygiene Association (AIHA) have received a copy of your letter, dated 2007-01-26, regarding the systematic review of ISO 19011 as members of the American National Standards Institute (ANSI) technical advisory group (TAG) to ISO TC 207.

Founded in 1911, ASSE has more than 30,000 members who manage, supervise and consult on safety, health and environmental issues in industry, insurance, government and education. ASSE participates in the development of safety standards by acting as the secretariat for seven standards committees and serving on 40 other safety standards committees. Founded in 1939, AIHA is a non-profit professional association representing 12,000 occupational and environmental health and safety professionals. AIHA has also participated in safety standard development, including acting as the ANSI secretariat for the Z10 Occupational Safety and Health Management System Standard, as well as for the ANSI Z9 and Z88 standards. In addition, AIHA operates several well-recognized laboratory accreditation programs that help ensure the quality of the data used in making critical worker protection decisions.

We are responding to your letter separately from the response you received from the U.S.TAG to TC 176 and 207, not because of any disagreement, but to further emphasize the importance of appropriate stakeholder input in the proposed revision to ISO 19011. As your letter specifically referenced occupational health and safety management systems (OHSMS) in your feedback questions and in the diagram representing the management systems in the market, we would like to add our input to this systematic review process.

First, we would like to provide feedback to your question A4: *How generic should ISO 19011 be?*

We feel it is imperative that ISO 19011 specifically include and cover OHSMS auditing. It is clear from surveys conducted by the OHSAS Working Group that certification of OHSMS is being marketed and provided by a number of entities worldwide. As ISO 19011 recognizes, the specific auditor knowledge and skills needed in order to have confidence in the audit results differs depending on the management system being audited. Auditors qualified to conduct either environmental or quality management system audits are not automatically qualified to conduct OHSMS audits.

ASSE and AIHA issued a position statement specifically on this subject in 2005. A copy of that position statement is attached for your use and reference. Additionally, ASSE and AIHA have continued their active involvement in developing appropriate requirements for conducting OHSMS audits by working with members of the U.S. TAG to TC 176 and TC 207 to revise the U.S. supplement to ISO 19011 to specifically include OHSMS audits.

Having one auditing standard is particularly important given the fact that many organizations manage their occupational health and safety and environmental issues within a single management system. Companies need one harmonized management system, not a series of systems or programs that operate independent of one another.

Second, we would like to provide feedback to your question F: *Should any revision of ISO 19011 wait until finalization of ISO 17021-2?*

Our position in this regard is no. The revision of ISO 19011 should not be contingent upon finalization of ISO 17021-2. In our experience, not all third party management system audits are conducted for the purpose of certification or by certification bodies accredited pursuant to ISO/CASCO requirements. Generic guidance is needed for all types of management system audits – first, second and third party – regardless of the entities involved in the audit activity.

Finally, we would like to provide feedback to your question H: *Should other disciplines be involved when revising ISO 19011 such as financial, operational and/or risk auditing?*

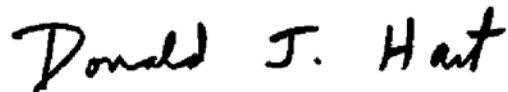
As we feel it is critical to include OHSMS in ISO 19011, we also feel it is critical to have active involvement of occupational health and safety professionals in the development of the standard. As there is no separate ISO technical committee for OHMS, we recommend the adoption of an approach similar to that ISO is currently using with its Social Responsibility Working Group. The establishment of a separate Working Group, as opposed to assigning the standard to a single existing ISO technical committee would allow for representation and input from a variety of interest groups – including OH&S professionals.

We appreciate the opportunity to provide input. ASSE and AIHA have strong desire to be active participants as this standard development effort moves forward.

Sincerely,



Michael W. Thompson, CSP
President, ASSE



Donald J. Hart, PhD, CIH
President, AIHA

cc: Secretary General, ISO
Chair, TC207
Chair, TC176
Chair, ANSI/AIHA Z10
S. Cornish, ANSI