

## **The Role of Consensus Standards in the Practice of SH&E**

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### **Introduction**

Over the past several years, with increasing frequency I have been asked by colleagues, students and coworkers about my participation on standards committees, the reasons for these committees, their utility and so on. Quite honestly, it seemed that the underlying inquiry in many instances was really, “What’s it all about?” In other words, should they get involved in this aspect of their profession?

Realizing that I had considered the same questions many years ago before I chose to get involved, I decided to start taking a few notes and track some of these conversations. What follows, then, is a reflection of this collection of questions and responses. I am presenting them in the form of a mock interview.

So here are the ‘nuggets of gold’ I came up with in response to the most commonly phrased questions relating to how in the course of my practice of our profession has led me to explore the role of consensus standards and what it has meant for me. It is my hope that as each of you consider your work and your participation in the EH & S field, that participation in one or more standards committees will become part of your professional resume. My experience is predominantly through ANSI committees where out ASSE serves as Secretariat, so my comments will reflect this.

My first experience was at the direction of my supervisor as part of his mentoring efforts. I had some experience in maritime safety and with the commercial diving industry. The American Society of Mechanical Engineers (ASME) was well into the development of a consensus standard addressing the design, construction and operation of manned diving systems and their components. In particular, the ASME Code for Pressure Vessels for Human Occupancy (ASME- PVHO) focused on diving bells, decompression chambers and similar devices. My employer at the time was quite new to commercial diving operations, but found itself rather deeply and suddenly involved with them. While I was a youngster at the time compared to the wealth of experienced engineers who had been participants well before I attended my first meeting, I found them to be professional, courteous, and welcoming. I listened and observed. I was soon engaged in conversations during breaks and over meals. Just as quickly, I then found that I was drawn into the deliberations of the Committee when my background and knowledge matched the topic of the discussion. There was no exclusion or intimidation, other than a few unsubstantiated, pre-conceived notions I may have held. Fear of the unknown might best describe that. Such fears were never observed or realized, even to this day. The process actually **REQUIRES** and **ENCOURAGES** multiple points of view. The very nature of consensus standards calls for nothing less.

## **What Are Voluntary National Consensus Standards?**

Well, let me start my saying that they are NOT rules or regulations. They are not composed based on the dictate of a law or statute. Government agencies (think: OSHA) have that task, which they pursue through the Public Rulemaking Procedures.

I describe the standards produced by these committees as detailed, technically-sound guides that are reflective of best practices as assembled by knowledgeable, informed and motivated individuals representing a wide and balanced variety of vested interests in the topic.

The make-up of a committee will typically include a balanced cross-section of employers, workers or end-users, equipment manufacturers, researchers, insurers, and perhaps even relevant government agencies. The latter usually only participate as official Observers, due to the restrictions imposed by the public rulemaking procedures if they should be a part of a rulemaking- or enforcement-agency.

As ‘best practices’, these concerned committee members, and their supportive employers, seek to advance the need to provide the safest environment for people who pursue work in the face of specifically recognized hazards. The likely application of a standard will cross many industries, although some are more narrowly drawn.

As a published technical guideline representing best practices, these standards can be a model to assist safety professionals (among others) where there are no specific existing laws or regulations, or provide guidance while trying to comply with confusing or incomplete regulations. Consensus safety standards, being reflective of industry-learned best practices, give the safety manager the benefit of those experiences. And they can be referenced by a safety manager to document needs and solutions to their employer.

## **Who Makes These Standards?**

It is not ANSI (the American National Standards Institute) or ASME or ASTM (the American Society for Testing and Materials) or the SAE (Standards for Automotive Engineering) or any other similar organizations, even though it is their name in the title. These are the overseeing bodies or organizations who have established themselves and their procedures for assuring open, balanced, transparent and fair deliberations.

In turn, ANSI (and others) will commonly turn to interested organizations to oversee the day-to-day administrative support and meeting support for the established committees. This is where we see the ASSE step up. And step up they have; big time! ASSE presently serves as the Secretariat (support agency) providing logistical, clerical and other support directly to eight standards projects covering more than fifty committees and their published standards. This is a manpower intensive and sometimes costly duty, as it typically includes arranging meetings, locating meeting locations suitable for the group size or the number of committees or sub-committees anticipated, having the means to accurately capture the minutes of each meeting, distributing minutes and ballots and correspondence, and supporting meetings by providing historical or background information, monitoring proceedings to assure compliance with Roberts Rules of Order, and assure committee compliance with ANSI’s standards.

No, the standards are written by informed and motivated safety professionals just like you and me. Safety professionals who understand that standards are not a done-once-and-we-are-through proposition, but rather bear regular review as new equipment, procedures or worksite challenges continue to evolve. Who have a passion for supporting the safety of our workers and are keen on not letting the lessons of the past

go by without learning from them to prevent needless pain and suffering in the future. Professionals who may have a success story of their own, or a safety challenge that was met and corrected in a new or innovative manner, and they are willing to share that success for the greater good. And those who, while they may not feel that they have much to offer other than their enthusiasm, will learn from interacting with experienced safety leaders.

For example, as you look at the speaker's program of this PDC, you are being treated to seeing, hearing and perhaps meeting a number of giants from the fall prevention/fall protection industry. People whose national and international renown and recognized expertise is absolutely top-shelf. How can I say this? It is only because of my election to get involved with fall prevention through the ASSE/ANSI Z359 Committee that I have met and enjoyed the privilege of working with recognized leaders including Randal Wingfield, Dr. Nigel Ellis, Joseph Feldstein and others.

And it is so much more than just fall prevention. You also have present at this PDC leaders from other disciplines who also value and participate in the consensus standards effort. Consider Eric Stager for Industrial Hygiene matters. Or Gary Lopez in construction safety. Charlie Halfen on safe motor vehicle fleet operations. Or Craig Schroll on confined space entry matters. The list goes on and on.

## **Is the Consensus Standards Process Fair?**

In a word, Yes! ANSI's procedures are clear and specific in meeting the need for broad, balanced representation on committees, and that participation by all interested parties is enabled. Even the voting process, the allowance for additional discussion when alternative views of substance are brought to light plus appropriate timetables that both allow for healthy debate but support timely, active standards reviews are addressed.

ANSI committee's develop their documents through the efforts of their members. They are discussed, debated, amended, re-reviewed and examined inside out and end-to-end. Each committee will reach a consensus before moving to the next step towards the acceptance of a proposed standard by ANSI and its subsequent publication. Please note that a 'consensus' vote does not mean 'unanimous' vote; we follow a majority voting rule. Members holding dissenting viewpoints are afforded specific procedures by which their concerns can be raised and are specifically addressed by the committee.

As the Secretariat appointed by ANSI, our ASSE provides the manpower to actively manage all of the ASSE-supported ANSI committees and subcommittees in keeping with these standards.

## **Publication of ANSI Standards: Who Does It Help?**

They help all of us! As a 'best practices' document and technical guideline, ASSE/ANSI standards enjoy immediate recognition and credibility amongst potential users. These standards have historically been embraced by safety professionals as a recognized 'benchmark' against which they can measure their own safety programs and safe work practices.

If you use contractors or have sub-contractors within your realm, stipulating appropriate ANSI standards in your contracts with those entities can provide significantly improved controls for you

And ANSI standards hold favor with OSHA in their rulemaking efforts. Some have been accepted or adopted by the government, and some are referenced in OSHA's rulemaking and interpretation documents. And some have been, and continue to be, identified by OSHA to support some of their enforcement work. For example, should find fault with an organization's failure to recognize a fall-from-elevation hazard, and subsequently fail to take appropriate preventative actions, the agency might point to the ANSI Z359 standard as a fitting guidance document that could have been employed.

## **Is this something I could do?**

Absolutely! Do not underestimate the value of your experience, education and training. Do not sell yourself short about the value that you bring to your employer and to your profession. We each have a unique set of experiences and interactions that make our viewpoints credible and pertinent to the development of a consensus standard.

If you aren't sure, consider attending a committee or subcommittee meeting as an Observer. In most cases, this is readily available. Observers can be present, can interact with the members during deliberations, but cannot vote on any matter brought before them.

To join a consensus standards committee, there is an application process. It is centered on submitting an application form. Relax - it only entails responding to a few questions so that you can describe your areas and level of interest, your work, education and training that supports those interests, that you are ready, willing and able to commit to participating, and how to get in touch with you.

Understand that you are making a commitment. A time and effort commitment. As a minimum, you are agreeing to work with your fellow Safety Professionals on the committee, and to carry your fair share of the workload.

That does not mean feeling obligated to volunteer for every subcommittee or every drafting group. But you should feel comfortable with the subject under review. If you are, then you will naturally migrate to those topics. Your work ethic and your professional background will lead you there.

So just how much of a commitment is involved? Well, it does vary a bit, depending on how 'hot' a particular topic is, and how important it is to you. Or your employer. Or the people you support. Or your customers. Most committees meet twice per year. Meetings may be via conference call or they may involve face-to-face events calling for travel. There may be some email exchange or phone calls or possibly some research or drafting work between sessions. Larger standards committees tend to have many subcommittees, so if you volunteer to serve on a main committee and several subcommittees, this could be a semi-annual, three day meeting event for you.

If a committee has multiple subcommittees, perhaps there is only one subcommittee with which you have interest and expertise. Well guess what: you don't have to formally join a main committee if you only wish to participate on a subcommittee. Contact members of the committee with whom you have interest, and the subcommittee chairs. Ask them if they could use your expertise and enthusiasm to help draft proposals that lead to standards. Subcommittee Chairs have the authority to engage non-committee members for the work of their subcommittee.

## **SUMMARY**

Just as ASSE takes its strength from its members, so too does the consensus standards process. If we each are willing to take an oar, we can propel this ship forward. It is an ever-changing world in which we live and work; if we don't work on keeping our profession's standards at the leading edge, we will all fall behind. And none of us can afford that.

So there you have it. This is what I have observed and come to learn and know over the past twenty years or so. You are a professional. You have a unique set of qualifying traits forged by your education, training and work experience. Sooner or later, your professional values and passion will lead you to finding a way to influence our industry's standards so as to make them better. It is a never ending quest to constantly learn, refine, re-define and improve based on best practices within the rule of law. Step up and

give it your best; you will grow, your profession will prosper, and we will all profit from you having done so.

*NOTE: The opinions and positions described herein are those of the author and are not necessarily reflective of those of The Hartford Steam Boiler Inspection & Insurance Company.*