

February 17, 2010

Mr. Shabbir Hakim  
Administrator  
Alberta Council of Turnaround Industry Maintenance Stakeholders  
P.O. Box 76182  
Calgary, Alberta  
T2Y 2Z9

Dear Mr. Hakim:

Thank you for your letter requesting an acceptance to recognize protective footwear that meets the requirements of a standard other than one of those listed in subsection 233(2) of Alberta's Occupational Health and Safety (OHS) Code. Section 10 of the OHS Regulation requires that the alternative equipment – protective footwear meeting the requirements of a standard that is not listed in subsection 233(2) – provides workers with equal or greater protection than equipment meeting the original requirement.

I have compared European Standard EN ISO 20345: 2004, *Personal protective equipment – Safety footwear* to the two standards listed in subsection 233(2) of the OHS Code i.e. CSA Standard Z195-02 *Protective Footwear* and ASTM Standard F2413-05 *Specification for Performance Requirements for Protective Footwear*. In terms of toe cap impact and compressive force protection, footwear approved to the EN standard offers greater protection than footwear approved to the other two standards.

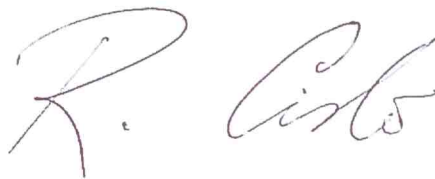
While there is variation among the standards regarding test criteria and test methods e.g. the EN standard's minimum puncture resistance value is 10% less than that required by the CSA and ASTM standards, on balance I believe that the three standards offer an equivalent level of protection. I grant your request for an acceptance subject to the following conditions:

- (1) Safety footwear assessed to European Standard EN ISO 20345: 2004 must bear a "CE" mark to indicate that it has been approved by an independent third party testing agency.
- (2) Safety footwear must be rated as providing protection against additional hazards identified in the employer's hazard assessment i.e. the need for sole puncture protection, metatarsal protection, electrical protection, etc.

- (3) This acceptance applies only in Alberta to employer members of the Alberta Council of Turnaround Industry Maintenance Stakeholders.
- (4) This acceptance must be
  - (a) posted at the work site,
  - (b) secured to or kept with the equipment to which the acceptance applies, or
  - (c) communicated to the workers who may be affected by it.
- (5) This acceptance remains in effect until such time as it is rescinded or legislative changes make it invalid or unnecessary.

This acceptance has been granted under the authority given to a Director of Inspection under section 10 of the *OHS Regulation* and section 34 of the *OHS Act*.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Cislo', with a large, stylized 'R' and a cursive 'Cislo'.

Ray Cislo, P.Eng., BSc.(H.Kin.)  
Director of Inspection  
(780) 415-0649 Fax (780) 422-0014