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Dry suits not providing insulation of the respiratory tract: proposed categorisation

(Action point 6.3 (b) from the PPE WG meeting on 18 September 2014)

This paper covers only dry suits which do not provide complete insulation from the atmosphere, since the latter are considered PPE Category III as agreed at the PPE WG of 18th September 2014.

Different types of so-called "dry suits" exist on the market; in order to clarify the situation, a research was carried out which included a visit to Marine equipment trade show (METS), where different manufacturers and stakeholders were met.

The dry suits can be broadly divided in two categories:

- a) dry suits not providing thermal protection, i.e. which only purpose is to keep the wearer dry and which main aim is to provide comfort;
- b) dry suits providing thermal protection, i.e. designed to keep the wearer warm and not just dry, and which main aim is to provide safety.

A clear distinction is needed between these two types of suits and a decision needs to be taken on whether such products are to be considered PPE or not, and of which category; it has to be kept in mind that a harmonised standard for dry diving suits exists, EN 14225-2. Moreover, some so-called "dry suits" are tested against the requirements of harmonised standard EN ISO 15027 for immersion suits. Other products, also marketed as "dry suits", are tested against the requirements of harmonised standard EN 343 for protective clothing protecting against rain.

Therefore, a better naming of the different products may be advisable in order to clearly distinguish them and consequently to reduce the risk of confusion among consumers and other interested parties.

In line with the categorisation of other protective equipment, it is proposed here that only "dry suits" claiming thermal protection are considered as PPE category II; "dry suits" which only purpose is to keep the wearer dry and for which the manufacturer explicitly states that it doesn't provide any thermal protection, but only protects against e.g. rain, would therefore be considered PPE category I if they are for professional use, and excluded from the scope of PPE Directive if they are for private use. The latter products should have to be marketed under a different name,

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in order to avoid confusion with dry suits which are PPE category II; such products are covered by the definition in point 6.7 of the PPE guidelines appendix (protective clothing which are PPE category I), which would therefore not need to be modified.

According to this interpretation, points 6.1 (category II), 6.3 and 6.4 (category III) of the PPE guidelines appendix would be modified as follows:

All items of clothing and/or accessories (whether or not detachable) designed and manufactured to provide specific protection
remark :
This category includes also:
o protective clothing used for sports activities, such as diving and immersion suits providing thermal protection, protective clothes for waterskiing, etc.;
o protective clothing, such as overalls and two-piece suits, providing thermal protection in case of accidental fall into the water
o bullet-proof clothing used by other than the armed forces (for instance security guards);
o clothing protecting against infective agents used by other than the armed forces.

Clothing and/or accessories (whether or not detachable), , designed and manufactured for use in high-temperature environments the effects of which are comparable to those of an air temperature of 100°C or more and which may or may not be characterised by the presence of infra-red radiation, flames or the projection of large amounts of molten material

Clothing and/or accessories (whether or not detachable), designed and manufactured for use in low-temperature environments the effects of which are comparable to those of an air temperature of -50°C or less

Point 6.7 (category I) would be modified as follows to provide additional clarification:

Clothing and/or accessories (whether or not detachable) for professional use designed and manufactured to provide protection against atmospheric conditions which are neither exceptional nor extreme, such as rain.