

## Guidance for PPE Distributors & Laundry Service Providers – Logos & Alterations



Increasingly customers are requiring corporate, partnership and joint-venture logos to be applied to their PPE garments. Whilst it may seem difficult to refuse a customer's request, there are significant potential impacts to the performance and conformity of the garments, depending on the specific garment and the type and size of logo being applied.

Similarly, alterations or repairs to garments all have potential to impact the product performance so special care should be taken to ensure the garment continues to perform and protect to the levels originally certificated.

Any changes made to a garment could have compliance implications, including potentially impacting your Economic Operator status, and therefore your legal responsibilities & liabilities may also be different.

This guide has been put together by members of BSIF to help guide you through the key things you need to know - from what to tell your customer, how to check what you are doing is compliant and not detrimentally impacting the certification, through to what to do, and who to ask, if you are unsure.

## What Can or Cannot be Done?

As part of the certification process, the manufacturer of the goods will have provided their full technical file of supporting information and component certificates, as well as supplying physical samples, to the Approved Body or Notified Body completing the certification. A Declaration of Conformity in relation to each certification type (UKCA/CE/UKNI) must be supplied by the manufacturer (not distributor) of the goods, either as a URL or physical paper declaration, as well as the User Information Sheets which provide guidance on the appropriate use, care and maintenance of the item to ensure it performs as required. Anything that deviates from the original test reports and physical sample used for the certification process has the possibility to detract from the performance levels stated.

So, what impact does this have in practice when adding a logo to a garment? There are key considerations for logos which Distributors and Laundries should be aware of when selecting logos:

**Type of Logo** – the logo type will impact the fabric and garment performance, so logos should always be selected / recommended based on the potential impact on the garment performance. For example, embroidering an EN343 certificated foul weather jacket will significantly damage the waterproof fabric so the jacket is likely to leak, so a heat applied logo would be more appropriate.

**Size of Logo** – particularly with EN ISO 20471 high-visibility certificated products, the size of logo is critical to the garment compliance. The EN ISO 20471 standard requires minimum visible area of fluorescent fabric as well as minimum reflective tape, applied in specific configurations. Depending on the amount of visible fluorescent fabric, the size of the logo may impact the classification of the item as it will cover up an amount of fabric.

EN20471 Requirements	Class 1	Class 2	Class 3
Reflective Tape	0.10 sqm	0.13 sqm	0.20 sqm
Fluorescent Material	0.14 sqm	0.50 sqm	0.80 sqm

The smallest size garment is always tested under the certificate to ensure compliance to these minimums, and as each garment will differ it is best to speak to the manufacturer for guidance on the maximum logo size. In some cases, you may need to use different sizes of logos on the smallest sizes compared to the larger sizes – be especially aware of how many logos you are applying. For example, a small logo on the chest is unlikely to impact the overall standard but combined with a larger logo on the back, and another on the sleeve, the chances are you will be detracting from the classification. This could mean a Class 3 garment could be effectively reduced to Class 2 performance, which may then mean the customer's health & safety requirements are no longer met (depending on their own risk assessment).

**Specific Testing Requirements** – there are likely to be specific testing requirements for the application of certain types of logos. In particular, in reference to any garment certificated to a flame retardant, welding, anti-static and / or electric arc standard.

- If a logo is under 10cm squared then it may not need to be tested – this could apply to a small front logo.
- If a logo is 10cm squared or larger, then it would definitely need to be tested (limited flame spread test) – this would apply for example to larger back logos.

Some very thin heat applied logos may pass the limited flame spread test, despite not being FR logos, as there isn't much volume to ignite. If the logo is thicker, then non-FR logos normally do NOT pass and you would have to use FR logos.

If the logo was FR and the logo material had been tested on the specific FR fabric, then the test house / Notified Body would accept this to include within the certification of the garment. If the logo was FR and hadn't been tested on the specific FR fabric, then it would still need to be tested to be included within the certification, BEFORE the logo is applied to any garments being worn by end users.

BSiF would recommend only using FR logos for application to any garment certificated to any heat & flame standard.

## Other Potential Processes that Impact Performance

**Repair & Alterations Services** - Where garments are being altered or repaired by a laundry service provider, it is imperative that factory original components are used.

For example, if a trouser certificated to EN ISO 11611 (welding) and EN ISO 11612 (heat & flame) is repaired with a standard poly-cotton fabric then the entire garment performance is compromised, and the wearer is no longer protected in line with the garment certificate.

Not only are there serious health & safety implications for this, but as you are changing some of the components used, you are also changing your Economic Operator Status so you, rather than the manufacturer, may become liable in the event of injury to the wearer.

Similarly, where alterations are made to shorten an inside leg or sleeve, consideration must be given to the requirement for a minimum of 5cm of fluorescent fabric between the edge of the garment and the reflective tape. If in doubt, always seek guidance from the manufacturer.

**Washing & Drying** – the User Information Sheet, along with the relevant conformity mark (CE, UKCA, UKNI) label in the garment, provide clear instructions on the use, care and maintenance of each item of PPE. This is key to ensuring the garment is compliant for its appropriate life-cycle - not following these instructions can result in the garment no longer complying to the certificated standards.

For example, if reflective tape is washed or dried at excessive temperatures, then the glass beads can come away from the silver backing of the reflective tape.

This may not be clearly visible during daylight, but will mean the essential reflective properties of the tape will not be present in darker environments, when light needs to be reflected back off the tape in order to make the wearer visible.

Where client garments are not able to be cleaned to a level that fully removes visible dirt and stains from fluorescent material, it may be necessary to pre-treat and re-wash garments to ensure they can remain compliant, or to condemn those that cannot be cleaned.

Attention should also be drawn to specific industry standards relating to cleaning & maintaining protective clothing, for example BS 8617 for fire-fighting PPE.

## What to ask the manufacturer & Checking Compliance

The manufacturer is responsible for ensuring the on-going conformity of the garment during production, but once changes are made to the garment(s), it is your responsibility to ensure this does not detract from the specified performance levels contained within the UKCA or EC-Type certificate.

The manufacturer should be able to provide guidance and support to ensure that anything you do to an item of PPE does not detract from the performance, including confirming maximum logo sizes and making available any factory original components such as fabrics, tapes and trims. This may also include providing original fabric swatches for testing FR logos, if they are unable to provide a valid certificate showing that logos have already been incorporated during the testing process.

Examples of evidence you may consider requesting / checking as part of your own due diligence of your supply chain include:

- Providing copies of User Information Sheets & Declarations of Conformity before asking you to purchase
- Checking the care label contains the relevant conformity mark (CE, UKCA, UKNI) & that each performance / standard claimed is clearly shown on the label
- Cross-checking to ensure that the UKCA or EC-Type Certificate & Declaration of Conformity match

In addition to checking compliance of your supply chain, it is also imperative that you check your own internal processes for ensuring compliance. Any changes you make to the original certificated garment could alter your Economic Operator status, and could have serious legal implications if things were to go wrong.

## BSIF Membership & Registered Safety Supplier Scheme

An increasing quantity of non-approved and non-certificated products are being sold into the UK - these products just do not perform as they should, putting lives at risk and again exposing the user to prosecution.

To help combat this, the BSIF has created the Registered Safety Supplier scheme (RSSS). Companies displaying the scheme's logo have signed a binding declaration that the safety equipment they offer meets the appropriate standards, fully complies with the PPE regulations and carries the relevant conformity mark (CE, UKCA, UKNI).

By working with suppliers who carry the RSSS enhanced accreditation there is a higher level of checks and process compliance assurance, through BSIF's independent audit process. This scheme applies not only to manufacturers, but is available to all companies operating within the PPE supply chain, and may support your internal audit processes.

### Who to ask if you are unsure?

The manufacturer should be able to help you in the first instance, but if you remain unsure, there are a number of resources available to you.

The BSIF website contains a large amount of useful reference documents as well as offering the full list of Registered Safety Supplier scheme (RSSS) members. These members can help, either in providing advice (and have under-gone training to ensure they are able to do so safely) or supplying products.

### FAQ

#### ***Q: What is the maximum size logo I can apply to a garment?***

A: This will depend on the specific garment(s) and the size of garment. The manufacturer should be able to advise you on this.

#### ***Q: Do I need to use FR logos on FR garments?***

A: We would always recommend that you do. The manufacturer may have already tested a particular logo type on the specific garment / fabric, and if so, they will be able to provide the certificate and recommend a source for the logos. If not, you will need to complete separate testing. Test reports should always be requested from suppliers of FR embroidery threads and FR heat applied logos.

#### ***Q: Can we use an equivalent fabric or reflective tape for repairs rather than the factory original?***

A: The garment certification and technical files are based on the original fabric & tape test reports, as well as the finished garment. We would always recommend that you obtain the specific fabric and tapes used during the original certification, otherwise you may be inadvertently putting the wearer at risk and potentially exposing your organisation to legal challenge if something were to go wrong.

#### ***Q: Our customer has told us to use multiple joint venture logos on a high visibility garment – if we do this at their request, who is responsible?***

A: The customer is responsible for ensuring the products they purchase met the requirements of their own health & safety risk assessments. However, it is recommended as good practice to make them aware that the certification is impacted, which may impact their own risk assessments. The only way to confirm this would be to work with the manufacturer to re-test the garment incorporating all of the logos required.

#### **For further information please contact BSIF:**

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