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ASTM INTERNATIONAL

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TO NOCSAE HELMET MANUFACTURERS:

**SEI Certification Bulletin #28
Product Labeling**

This bulletin will serve to alert SEI Participants which manufacture helmets to meet NOCSAE standard(s) of a recently identified concern related to product label evaluations.

LABELING FOR HEADGEAR THAT ARE NOT TO BE RECERTIFIED:

It has recently come to SEI's attention that product warning label(s) specific to headgear which *cannot* be recertified are, in some cases, being placed on the helmet(s) in an area that is not in compliance with the requirement(s) of the standard. NOCSAE DOC ND001-17m19, *Standard Test Method and Equipment Used in Evaluating the Performance Characteristics of Headgear/Equipment* Section 9.5 states the following:

- “9.5 Headgear that are not to be recertified as mandated by the manufacturer shall bear a permanent and legible warning on the **exterior** of the headgear stating the following:
1. This headgear shall not be recertified.
 2. The life of certification, which shall be no longer than 5 years from the date of manufacture.”

Unfortunately, it has become apparent that in many cases the laboratory labeling evaluations for this standard section have not been conducted correctly, where passing evaluation results have been reported in cases where the warning label required by ND001 Section 9.5 has been placed on the *interior* of the headgear. It should be noted that through an interpretation received from NOCSAE, SEI confirmed that the underside of the helmet bill or brim is considered the exterior of the headgear, and therefore can be considered an acceptable place for this label to reside.

As a result, on May 13, 2020, SEI requested that all contract laboratories which conduct helmet testing for SEI's NOCSAE Certification Program perform a comprehensive review of test reports and/or retained samples of SEI certified models for which ND001 Section 9.5 applies. In response to this request each participating laboratory has submitted a report to SEI to include a list of affected helmet models. Additionally, the laboratories will be revising each affected test report and re-issue an updated report with the product labeling assessment for ND001 Section 9.5 marked appropriately.

In the coming weeks, SEI will contact each affected manufacturer directly to confirm with that manufacturer which of their models have been identified as noncompliant. Additionally, SEI will issue a non-compliance letter for each affected model. For NOCSAE Level 3 products (i.e. headgear), a non-compliance identified with product labeling is considered to be a Critical non-compliance, as referenced in the SEI *Certification Program Manual* Section 30.9, *NOCSAE QC/QA Protocols*, and Section 15.0 *Nonconformance/Departure, Potential Hazard, and Complaints Received by SEI Filed Against Certified Products*.



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Therefore, a comprehensive corrective action response will be required to correct the labeling non-conformity(ies), where identified. In all cases, the corrective action response shall include, at a minimum, a proposed plan for notifying users that have purchased the affected helmet model(s) that the product is mislabeled.

For products that are currently certified, the corrective action response shall *also* include 1.) a submission of revised product labeling artwork (to confirm correct placement of the labeling required by ND001, Section 9.5) and submission of one (1) correctly marked sample to the laboratory for product labeling re-evaluation, 2.) a plan to address the labeling non-compliance on existing inventory of affected model(s), and 3.) confirmation that the revised product labeling will be implemented immediately on all newly manufactured affected helmet model(s).

Finally, for products that have been *withdrawn* from certification, but the manufacturer still has affected product remaining in inventory, the corrective action response shall *also* include a plan to address the labeling non-compliance on existing inventory of affected model(s).

If your company does not receive a follow up notice from SEI, as described above, it has been determined, based on the information provided by the laboratories, that the product labeling on your headgear product(s) subject to assessment against ND001, Section 9.5 is compliant in its current location. If you believe your product labeling to be non-compliant based on this information, and we have not contacted you directly, please reach out to SEI so that we may review the product labeling further.

Your cooperation and attention toward addressing the product labeling non-compliance identified for your product(s) is greatly appreciated. If you have any questions or concerns, please do not hesitate to contact us.

Sincerely,



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cc: SEI Staff
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