



Document: ISO/PC 283/N **134**

Our ref

Secretariat of ISO/PC 283

Date: 22 October 2014

**To the Members of  
ISO/PC 283  
Occupational health and safety management systems**

**Japanese position paper against ISO/CD 45001**

Please find attached a copy of the above position paper, which Japan has requested be circulated to the members of the PC, in addition to its comments on the draft.

We are grateful to Japan for its submission.

Yours sincerely

Charles Corrie  
For the BSI Secretariat of  
ISO/PC 283  
[charles.corrie@bsigroup.com](mailto:charles.corrie@bsigroup.com)

## **Japanese Position Paper toward ISO CD 45001**

Masao Mukaidono  
Chairman  
Japanese National Committee  
ISO/PC 283

ISO/PC 283 Japanese National Mirror Committee (hereafter, NMC) has carefully reviewed ISO/CD 45001 during multiple meetings. Our focus is on the consistency of statements in ISO/CD 45001 with Japanese law, and while we reviewed comments from relevant domestic stakeholders, we found regretfully that there are several points where we think modifications are required (see the Commenting Template for details). As a result of these review by the NMC, our voting position on ISO/CD 45001 as to proceed to DIS, therefore, is as follows:

### **Disagree with Comments**

This document states reasons for disagreement to proceed to DIS, and proposals for improvement of process for the draft standard.

Other detailed comments are presented in the separate ISO Commenting Template.

#### Comment 1

We have noted that the document ISO/PC 283/N123 “Comments of the International Labour Office on ISO/PC 283/WG 1 Document N25 “Potential CD” of ISO 45001, circulated July 1, 2014” and the document ISO/PC 283/N130 “ISO/PC 283 Secretariat's response to the ILO's comments on ISO/CD 45001” circulated on September 29, 2014 stated opinions of respective party, and now we consider that in developing ISO/CD 45001 it is important to fully use the knowledge and experience of the ILO which has dealt with international labour issues.

Labor issues are extremely sensitive matters (not only workers and employers, but also the Diet, legal circles, and academic experts are involved as stakeholders), and as such, we have been bringing together workers, employers, and government to cooperatively solve various issues. We consider that, in reviewing ISO/CD 45001 at PC 283, each member body submits comments which reflect opinions of workers, employers, and government of each country, and as such, the committee should attempt every effort to reconcile any conflicting arguments. On this assumption, we are ready to cooperate in making progress in developing standards according to ISO rules.

- 1) ISO/PC 283 and the ILO should have sufficient discussion on terms and definitions, and expressions of requirements using the defined terms, and should arrive at conclusion that satisfies both parties.
- 2) In the review of the draft, the first priority in consideration should be given to improvement and maintenance of safety and health of workers and other stakeholders if applicable.
- 3) The record of "Observations of the Secretariat" (i.e. the decisions taken on individual comments), as results of review for the comments formally submitted against a draft of the standard, should be provided to the members of ISO/PC 283 at an appropriate time such as when the next version of the draft standard becomes ready to be circulated. (This will help experts who have not participated in the TG's discussions understand the reasoning for individual decisions and prevent the re-opening of discussions in the mirror committee)

With more than 1,700 organizations OHSAS 18001 certified and more than 600 organizations ILO-OSH 2001 certified in Japan, it is crucial to resolve conflict between ISO and the ILO and to avoid creating a double standard including terms and definitions and interpretation whose differences are not clearly understood.

## Comment 2

The following describes our considerations on risk and OH&S risk. Two types of risk are defined and used in ISO/CD 45001. One is risk which is MSS common term and the other is OH&S risk which is unique to the area of occupational safety management. We understand that the former refers to risk in the management system of a general organization and the latter is a risk which refers to a discipline specific area. We are concerned, however, that the presence of two different concepts of risk in a management system standard may create obstacles for the users of the standards in developing management system in the organization to meet requirements of the standard. Therefore, we consider that ISO/CD 45001 should rather include only the definition of OH&S risk. The definition of risk which is MSS common term should be eliminated from ISO/CD 45001.

## Comment 3

The following describes our considerations on Annex A. Annex A, which is a guidance on the use of the standard, is included in ISO/CD 45001. We consider that Annex A has the following problems:

\* The present text has not been reviewed thoroughly by experts of ISO/PC 283.

The text in the sections of annex has been prepared independently by each TG and the entire Annex document has not been reviewed thoroughly. While the CD voting this time means to decide whether the CD is mature enough to proceed as DIS, we cannot allow it to proceed when it contains sections of text that has not been reviewed thoroughly as its entirety.

\* The amount of text is too much.

We have noted that the amount of text is too much considering the information it contains and the writing style and variation in level of detail shows inconsistency among different clauses. Therefore, we consider process of developing the annex must also be reviewed..

< Final Note >

ISO/PC283 should re-consider purpose of developing a management standard. While we understand the difficulty of reaching consensus among a large number of stakeholders involved, we earnestly hope that members of ISO/PC283 recalls once again the **mission of developing standards that is useful “for organizations to ensure safety and health of workers and build an environment in which they work safely”** and succeeds in developing standards that are truly effective for organizations.