Federation of the European Sporting Goods Industry

FESI Position Paper

RFU PPE-R/08.061

December 2024

The Federation of the European Sporting Goods Industry (FESI) welcomes the opportunity to provide input on the draft RFU PPE-R/08.061 concerning thermal requirements for surface wetsuits. While we recognize the need for appropriate standards for thermal protection under the PPE Regulation, we must highlight significant concerns about the proposed RFU and its practical implications for manufacturers, users, and compliance processes.

Summary:

- **Opposition to the current RFU PPE-R/08.061**: The methodology and requirements, particularly the adaptation from diving wetsuit standards, fail to address the specificities of surface wetsuits.
- **Concerns with EuroCommerce's proposal**: While we align with some points in their response, we disagree on key aspects, such as elongation limits, the scope of mechanical strength testing, and overly specific marking requirements.
- **A call for tailored, evidence-based adjustments**: FESI urges all relevant bodies to develop criteria that reflect real-world use cases for surface wetsuits, ensuring user safety while considering manufacturing realities and current market practices.

1. Key concerns and technical feedback

a. Thermal performance requirements

The current temperature classifications (e.g., "Class E for >22°C") do not align with the operational conditions for surface wetsuits. Instead, temperature ranges should be adapted based on established practices by European and International Sports Federations, which govern competitions and real-world applications.

For example, summer wetsuits often use thinner materials (e.g., 1mm) tailored for water temperatures above 16°C. The RFU's rigid thermal categories risk excluding such products, which are popular and proven safe by users.

→**Proposed Solution**: Revise the thermal performance table to reflect the temperature ranges already respected by surface sports practitioners and include testing protocols suited for thinner materials without unnecessarily penalizing compliance. Add a Class 'S' for surface wetsuits for water temperature between 12 and 25 degrees.

b. Material strength and flexibility

Surface wetsuits are distinct from diving wetsuits in their requirements for mobility, comfort, and flexibility. For example, materials with higher elongation, up to 10%, are commonly used and widely accepted without compromising user safety.

Testing for tensile strength and elongation at thresholds designed for diving wetsuits (e.g., 150N) is inappropriate and impractical for summer and lighter surface wetsuits.

→**Proposed Solution:** Eliminate unnecessary mechanical strength tests.

c. Sampling and testing requirements

Requiring up to 50 samples for testing a single product range, as implied in the current RFU, is impractical and disproportionate. Manufacturers typically produce ranges with variations in material thickness, zippers, linings, and seams. Testing the "lowest-performing" variant in a range has consistently proven sufficient to ensure compliance.

→**Proposed Solution**: Limit testing to the critical components and lowest-performing variations within a product range. Allow simplified protocols such as hot plate testing (ASTM F3340, ISO 8302:1991) for thermal performance evaluations.

d. Marking and labelling requirements

Excessive and verbose warnings risk overwhelming consumers and reducing compliance. For example, the proposed text for Class E products could discourage use in conditions where these products are entirely appropriate.

Additionally, translating lengthy warnings into multiple EU languages presents significant logistical challenges. It could result in labels being too long or impractical, or lead to labels being ignored altogether by consumers.

→**Proposed Solution:** Simplify warnings to concise statements like, "Surface wetsuit, NOT FOR DIVING", while additional contextual information should be provided in user guides or online. Optional extended guidance could state: "Wetsuit suitability may vary by 5-10°C depending on user weight, activity, and environmental factors."

e. Practical testing adjustments

Testing protocols currently reflect diving-specific activities, such as full submersion and jumping into water. Surface wetsuits are designed for activities where the immersion is mostly intermittent. Testing should reflect these conditions.

→**Proposed Solution**: Adapt practical tests to reflect real-world use, such as walking in and out of water or intermittent swimming movements.

f. Transition period for implementation

To ensure market stability and allow manufacturers to adapt, a transition period is essential. FESI recommends aligning implementation with production cycles, making the new requirements effective for products entering the market in 2027.

2. Recomendations

FESI proposes that the Commission and Member States:

1. **Revise the thermal and mechanical criteria** to reflect the specificities of surface wetsuits, ensuring they remain fit for purpose without overly restrictive requirements.
2. **Recognize existing data and standards** used in competitive sports as a basis for classification.
3. **Simplify testing protocols** to focus on the critical elements of performance and safety, avoiding unnecessary burdens.
4. **Provide a clear and proportionate transition period** for manufacturers to comply.

3. Conclusion

FESI remains committed to supporting the development of safe, effective, and appropriate standards for surface wetsuits. We urge Notified Bodies, the Commission and Member States to consider the practical and technical realities of the sporting goods industry and adopt a balanced approach that benefits both consumers and manufacturers.

We stand ready to contribute further to this process, including through the development of a dedicated standard for surface wetsuits under the PPE Regulation.

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Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

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