



March 12, 2026

The Hon. David Keeling
Assistant Secretary

Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Ave., NW
Washington, DC 20210

Re: OSHA – Update PPE Standard References

Dear Mr. Keeling,

Pursuant to the Administrative Procedure Act (5 U.S.C. § 553(e)) and Section 6(b) of the Occupational Safety and Health Act (29 U.S.C. § 655), the International Safety Equipment Association (ISEA) and the undersigned organizations respectfully petition OSHA to update, on an expedited basis, its incorporated-by-reference references to the following national consensus standards:

- **ANSI/ISEA Z87.1 – Eye and Face Protection** (29 CFR 1910.133)
- **ANSI/ISEA Z89.1 – Industrial Head Protection** (29 CFR 1910.135)
- **ANSI/ISEA Z308.1 – Workplace First Aid Kits** (Appendix A [non-mandatory] to 29 CFR 1910.151)

In addition, we ask that this activity be entered into the agency’s regulatory agenda.

OSHA’s current references include editions dating back to 1989 (Z87.1), 2009 (Z89.1), and 1998 (Z308.1). Since those references were last updated, the standards have undergone substantial improvements that enhance worker protection, clarify testing protocols, and reflect modern materials and hazard environments. In its September 9, 2009 Federal Register final rule titled *Updating OSHA Standards Based on National Consensus Standards; Personal Protective Equipment* (74 FR 46350-46361), OSHA stated that it was updating regulatory references to “recognize more recent editions of the applicable national consensus standards” and deleting older editions of such standards. In that final rule, OSHA said it “will use the direct-final rulemaking process to update national

consensus standards referenced in its PPE standards when it is appropriate to do so¹.” Now is an appropriate time to update these references.

If OSHA were to make these updates, it would make work safer for employees because they would have greater access to safety innovations in the PPE and safety equipment standards listed below.

Eye and Face Protection (ANSI/ISEA Z87.1)

Nearly 70 million² American workers rely on safety eyewear to keep safe on the job. The updated ANSI/ISEA Z87.1 references would be:

1. 2025
2. 2020
3. 2015

OSHA’s references to ANSI/ISEA Z87.1 are:

1. 2010
2. 2003
3. 1989 (reaffirmed in 1998)

Compared to the editions currently referenced, the newly published ANSI/ISEA Z87.1-2025:

- Strengthens impact, lens haze, and minimum coverage area testing requirements
- Improves marking requirements for prescription lens carriers
- Protects workers against bloodborne pathogen exposure, by incorporating ANSI/ISEA Z87.62-2021
- Makes the standard more understandable to a wider audience, through clarifications of definitions and scope
- Takes advantage of advanced materials not available in 1989
- Addresses a visual effect that welders find alarming and distracting, by adding a new test

These updates are not found in the editions currently referenced, which are technically allowable under the regulations. This permits outdated products to be marketed as compliant, despite the availability of significantly more protective products that meet modern standards.

¹ 74 FR 46352, see footnote 2

² [Link to PPE use data](#)

Head Protection (ANSI/ISEA Z89.1)

33.3 million³ Americans wear ANSI/ISEA Z89.1-compliant head protection to keep safe at their jobs. Updated references for head protection would be:

1. 2026
2. 2019
3. 2014

OSHA's references to Z89.1 are:

1. 2009
2. 2003
3. 1997

The forthcoming 2026 revision of Z89.1:

- Embraces safety-driven innovation by establishing a fully integrated safety helmet framework (including chin strap performance and anti-roll-off testing)
- Brings significant clarity to the market by establishing a much-requested new marking and classification system
- Maintains core impact absorption requirements
- Maintains requirements that head protection labeled for use in high heat conditions must pass all test metrics after a four-hour high heat preconditioning
- Maintains requirements that component makers must test head protection with components attached to ensure compliance

Compared to the editions currently referenced by OSHA, these and other elements in the updated standards increase transparency and choice in the marketplace and ultimately improve worker safety.

Workplace First Aid Kits (ANSI/ISEA Z308.1)

ISEA estimates most of the 160 million Americans in the U.S. workforce have access to – and rely on – an ANSI/ISEA Z308.1-compliant first aid kit to keep safe at their jobs. Right now, OSHA references the 1998-version of this standard in a non-mandatory appendix⁴.

The forthcoming 2026 revision of Z308.1 enhances workplace first aid readiness by establishing a more comprehensive framework extending beyond minimum kit contents. In addition to updated and task-appropriate supplies, the revision plans to include clear and practical first aid guidance with kits, provided in both English and Spanish, to ensure

³ [Link to PPE use data](#)

⁴ [29 CFR 1910.151 -- Medical services and first aid.](#)

employees accessing first aid supplies have clear information. The revision also acknowledges the importance of having personnel who are appropriately trained in first aid. When published, the next edition of Z308.1 will:

- Address the opioid overdose crisis in America, by allowing for inclusion of an optional opioid overdose reversal medication
- Maintain kit classifications (Class A for smaller workplace or Class B for complex workplaces)
- Improve emergency relief to workers by maintaining foil blanket requirements, greater specificity for tourniquets, and robust guidance bleeding control kits

Compared to the 1998 edition currently referenced by OSHA, these and other elements in the updated standards dramatically improve worker safety.

Opportunity for OSHA to Lead in Workplace Safety Best Practices

Revisions to the above standards reflect best practices already being used by industry, thereby lessening their compliance burden. While the technical updates are largely non-substantive, they are nonetheless needed to best align OSHA with the regulated community. Making these technical changes would send a clear message that OSHA can move at the speed of business and remain relevant and responsible for best practices in worker health and safety.

Positive Impact Without Added Cost or Regulatory Burden

Updating 1901.133 and 1910.135 will allow OSHA to improve worker protection at no regulatory cost to business, since updates to consensus standards incorporated by reference are technical modifications to existing regulations. When OSHA updated these regulations on September 9, 2009, the agency stated “[t]his action is not economically significant within the context of Executive Order 12866, and that the rule imposes no additional costs on any private or public sector entity.” In fact, OSHA noted the rule “allows employers increased flexibility in choosing PPE for employees.” (74 FR 46354). It follows that this analysis would also apply to first aid kits, because updating the reference is also a technical modification to an existing regulation.

Finally, these updates would also be consistent with, and would complement, OMB’s *M-25-36, Streamlining the Review of Deregulatory Actions* issued October 21, 2025. In addition, because there is no incremental cost to the proposed updates, OSHA could act without the administrative burden of identifying off-setting regulations, as set forth in Executive Order 13771⁵ on January 30, 2017.

⁵ [82 FR 9339](#)

In summary, updating these incorporated references would:

- Improve the safety of over 100 million American workers
- Align OSHA regulations with widely adopted industry best practices
- Impose no additional regulatory burden
- Reflect technical updates already in use across the marketplace

We respectfully request that OSHA initiate rulemaking to update these references on an expedited basis.

Thank you for your attention to this petition. Please feel free to reach Cam Mackey, ISEA President & CEO, at cmackey@safetysafetyequipment.org about any of these standards or Michael Vitale, Vice President at The Vision Council, at mvitale@thevisioncouncil.org regarding the Z87.1 and Z87.62 standards.

Sincerely,



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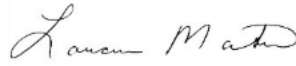
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