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Carsten Jonas

carstenmjonas@gmail.com

Petition to amend Cal/OSHA regulation 8 CCR 3216

For the reasons set forth herein, I file this petition to propose that the Occupational Health and Safety Standards Board (OSHSB) amend the Cal/OSHA regulation at 8 CCR 3216 pertaining to exit signs, as set forth below.

Proposed amendment

8 CCR 3216 - add the following as a new subsection to the regulation:

(d) Option To Use Internationally-Standardized Pictogram. In lieu of or in addition to the word "EXIT", exit signs may contain the pictogram for an emergency exit as specified in Standard 7010 as published by the International Organization for Standardization. The pictogram shall be at least 6 inches in height.

Reason for petition

A pictogram (symbol) for exit signs is internationally-standardized and has been adopted in many countries around the world over the past several decades, including other English-speaking countries such as Canada, Australia, New Zealand, and the UK. Including the internationally-standardized pictogram makes exit signs easily understandable by anyone regardless of the language they speak. This would be particularly beneficial in buildings where there may be many people who don't speak English, such as a hotel or an international airport. In addition, when the internationally-standardized pictogram is used with a directional arrow, the arrow is much larger compared to the arrow on textual exit signs (see figure 1). This enhances safety by making it easier for occupants to find the exit, especially if it's a building that they're not familiar with.

The proposed requirement that the internationally-standardized pictogram be at least 6 inches in height is intended to be commensurate with Cal/OSHA's existing regulations for exit signs that use the word "EXIT", as currently required by 8 CCR 3216(a).

This proposed amendment does not, however, require that exit signs contain the internationally-standardized pictogram – if a new or existing building prefers to use the word "EXIT", this would still be permitted.

Figure 1: an example of the internationally-standardized pictogram with a directional arrow.



Interactions with other regulations

Federal OSHA

Federal OSHA does not object to the use of the internationally-standardized pictogram on exit signs, to the extent that the state/local jurisdiction allows it. Despite what initially appears to be a conflicting requirement in 29 CFR 1910.37(b)(2), 29 CFR 1910.35 provides that compliance with applicable provisions of NFPA 101, 2009 edition, will be considered compliant with regards to applicable provisions of federal OSHA's means of egress requirements. Since its 2003 edition, NFPA 101 expressly allows the internationally-standardized pictogram on exit signs, including in lieu of the word "EXIT", if allowed by the state/local jurisdiction, per sections 7.10.3.2 and A.7.10.3.2, the latter of which states: "Pictograms are permitted to be used in lieu of, or in addition to, signs with text." Therefore, this petition would make Cal/OSHA regulations more consistent with the federal OSHA regulations.

(It should be noted that federal law does not require state OSHA regulations to be identical to their federal counterparts.)

California Building Code (CBC) and California Fire Code (CFC)

In addition to the regulations referenced in this petition, the CBC and CFC regulate exit signs.

I plan to also submit a petition to the California Building Standards Commission (CBSC) to make amendments to the CBC and CFC.

CBSC specifies a form to use when submitting petitions, and this form requests information about petitions made to other agencies, so the petition to CBSC will be made after this Cal/OSHA petition is received.

For the reasons set forth above, I request that the OSHSB revise 8 CCR 3216 as set forth at the beginning of this petition.

Sincerely,
Carsten Jonas