



Market Surveillance

PPE Professional Footwear

Final Report

JACOP 2025

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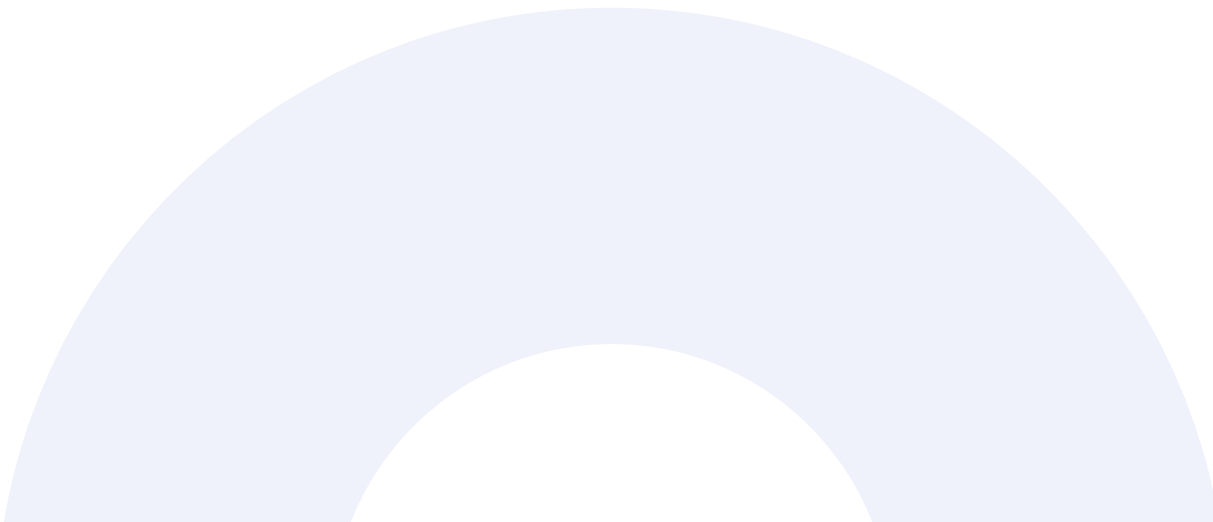
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LIST OF ABBREVIATIONS

AdCo	Administrative Cooperation Group
CE	Conformité Européenne
DoC	(EU) Declaration of Conformity
EC	European Commission
EFTA	European Free Trade Association
EN	European Standard
EU	European Union
ICSMS	Information and Communication System for Market Surveillance
JACOP	Joint Action on the Compliance of Products
MSA	Market Surveillance Authority
PPE	Personal Protective Equipment
PSA	Product-Specific Activity
SAGA	Surveillance Assistance and Guidance Analytics

Part 1

TEST RESULTS AND RECOMMENDATIONS

EXECUTIVE SUMMARY

OBJECTIVES OF THE ACTIVITY

PSA 11 on PPE – Professional Footwear assessed the compliance of safety shoes placed on the EU market with Regulation (EU) 2016/425 on personal protective equipment (PPE Regulation) and the harmonised standard EN ISO 20345.

The market surveillance campaign evaluated:

- The performance of footwear against selected safety requirements; and

- Compliance with documentation and marking obligations under the PPE Regulation.

The scope covered safety shoes for professional use equipped with a protective toe cap and representing different protection categories.

RESULTS AND CONCLUSIONS

A total of 83 samples were tested. Of these, 53 (64%) did not meet at least one performance requirement. In addition, 48 (58%) of models failed documentary checks for reasons including missing or incorrect CE marking, absence of instructions for use in the required national language(s), or missing indication of protection categories. When combining performance testing and documentary checks, 68 samples (82%) showed at least one non compliance.

These findings highlight systemic issues related to both the consistency of production standards and the completeness and accuracy of accompanying documentation. In particular, discrepancies were observed between products assessed during EU type-examination and those placed on the market.

In light of these findings, manufacturers and other economic operators are reminded that they are responsible for ensuring that serial production remains consistent with certified prototypes, that technical and supply-chain documentation is properly maintained and that product markings, instructions and marketing claims accurately reflect the level of protection provided. Failure to meet these obligations may result in market surveillance measures, including product withdrawals, recalls and warnings which, in some cases, include fines.

For end users, the findings underline the importance of purchasing safety footwear from reputable sources, verifying the presence of – and consulting – the instructions for use in the required national language(s) and ensuring that the declared protection category is appropriate for the identified workplace risks. The latter can be done, by, for example, checking the markings on the tongue of the shoe. Users should also be cautious of vague or exaggerated performance claims and consult Safety Gate for alerts or recalls.

OVERVIEW OF THE ACTIVITY

PARTICIPATING MSAs

A total of 10 MSAs from 7 countries participated in PSA 11. **Table 1** provides an overview of the participating MSAs and the number of samples each authority contributed.

PRODUCT SCOPE

PSA 11 covered professional PPE footwear for workplace use, classified as Category II under the PPE Regulation, requiring EU type examination by a notified body in accordance with Module B (including testing and certification), followed by manufacturer responsibility to ensure ongoing conformity to type (Module C).

The scope included safety footwear as defined in EN ISO 20345. This footwear is designed to protect workers from workplace hazards such as falling objects, crushing injuries, punctures and other mechanical risks.

They are commonly used in construction, manufacturing, warehouses, logistics, maintenance, utilities and industrial environments. A key feature of EN ISO 20345 footwear is the presence of a protective toe cap. The protection categories covered ranged from basic protection for dry indoor workplaces (SB) to categories offering additional protective features, such as antistatic properties and resistance to sole penetration (S1 to S5).

TESTING CRITERIA

Testing was carried out in accordance with the harmonised standard EN ISO 20345:2022. For samples made available on the market before 2022, tests were carried out according to the previous version of the standard, dated 2011. The testing plan focused on a

selection of mandatory performance requirements, relevant to the declared protection category of each model, including impact, compression, perforation and/or cut resistance, as well as antistatic properties.

SAMPLING AND TESTING

OVERVIEW OF SAMPLED PRODUCTS AND SAMPLING CHANNELS

MSAs collected 83 samples for testing, reflecting national sampling strategies. The sampling approach combined targeted, risk-based selection with non-targeted sampling and was therefore not representative of the overall market. The majority of sampled products fell within the S3 protection category (62 models), with the remainder distributed across SB, S1 and S5 categories.

Sampling was predominantly carried out through online sales channels (54 models), including manufacturers' websites, specialised workwear retailers and online marketplaces and was complemented by purchases from physical retail stores (29 models). Both EU- and non-EU-based economic operators were represented in the sample.

Table 1: Distribution of samples by MSA and product type (n=83)

Country	Market Surveillance Authority	No. of samples
Cyprus	Department of Labour Inspection, Ministry of Labour and Social Insurance	5
Germany	State Office for Health and Social Affairs Mecklenburg-Western Pomerania, Department 5 – Occupational Safety	15
Germany	District Government of Arnsberg, Environment, Health, Occupational Safety	10
Germany	Regional Council Tübingen	5
Luxembourg	Luxembourg Institute of Standardisation, Accreditation, Safety and Quality of Products and Services – Market Surveillance department	9
Netherlands	Netherlands Labour Authority	12
Norway	Norwegian Labour Inspection Authority	5
Portugal	Economic and Food Safety Authority	2
Spain	Economy and Industry Directorate of the Community of Madrid	5
Sweden	Swedish Work Environment Authority Product Regulations and Market Surveillance Unit	10

TESTING PROCESS

An accredited laboratory assessed the sampled footwear against the applicable requirements of EN ISO 20345 (depending on the certification provided, 2011 or 2022 edition). A total of 313 performance tests were carried out using procedures laid down in the harmonised standards. **Figure 4** provides an overview of the number of tests carried out for each performance feature.

In addition, MSAs checked documentation and markings using a commonly agreed checklist developed for the PSA. They verified the presence and legibility of mandatory information, such as protection categories, CE marking, instructions for use, warnings and economic operator details.

Following completion of the assessments, the results were discussed with participating MSAs and the technical expert during the PSA 11 laboratory meeting. It was noted that test results relate exclusively to the samples tested and may differ from those obtained during EU type examination. This reflects the distinction between prototype assessment carried out by notified bodies during certification and the verification by MSAs of products placed on the market. Nevertheless, manufacturers remain responsible for ensuring ongoing conformity of the product with the type throughout serial production.

TEST RESULTS

OVERVIEW OF THE TEST RESULTS AND MAIN FINDINGS

The results of the testing campaign revealed non-compliance across both performance and documentary aspects.

Of 83 samples, 53 (64%) did not meet at least one performance requirement (**Figure 1**). In addition, 48 samples (58%) failed documentary checks for absence of instructions for use in the required national language(s), or missing indication of protection categories (**Figure 2**).

When performance and documentation aspects were aggregated, 68 samples (82%) showed at least one non compliance. 15 samples (18%) were fully compliant (**Figure 3**).

Figure 1:
Laboratory test results (n=83)

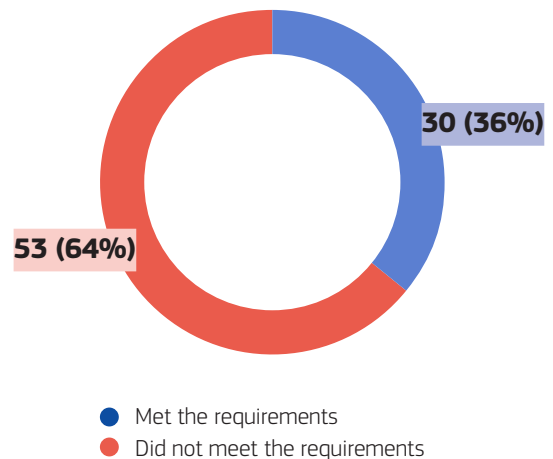


Figure 2:
Formal checks (n=83)

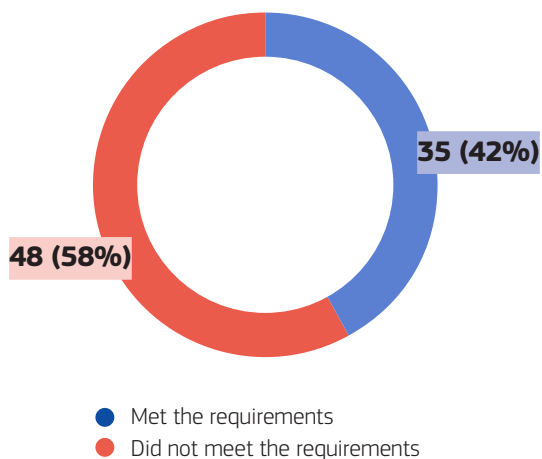
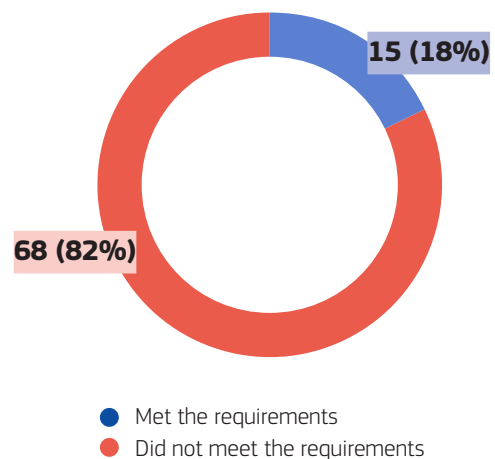


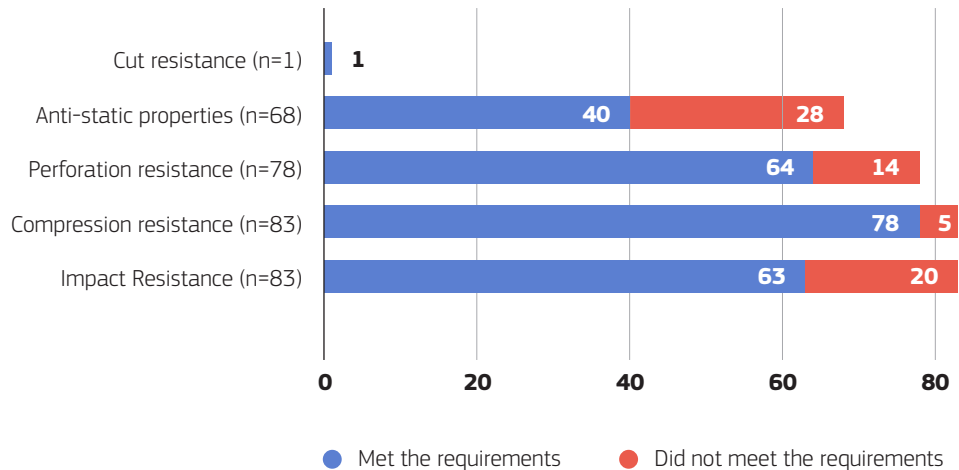
Figure 3:
Combined results of laboratory tests and formal checks (n=83)



RESULTS PER STANDARD

Non compliances were most frequently observed in relation to antistatic properties, followed by impact, perforation and compression resistance. No non-compliances were identified for cut resistance (**Figure 4**).

Figure 4: Distribution of failures across the different performance tests carried out under EN ISO 20345

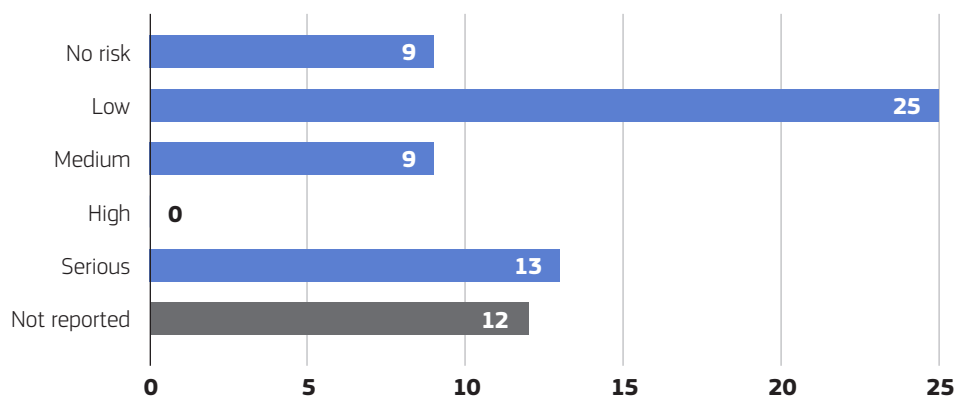


RISK ASSESSMENT AND MEASURES

RISK ASSESSMENT

The participating MSAs assessed the risks linked to the 68 samples that did not meet at least one requirement. These assessments took into account the type of non-compliance, and the probability and severity of the potential harm. **Figure 5** summarises the distribution of risk levels.

Figure 5: Risk levels (n=68)



MEASURES

MSAs adopted a range of follow up measures applicable to non-compliant products, in line with European and national legislation. The most common measures were sales ban or withdrawal from the market (24) and the issuance of warnings, including fines, to economic operators (15). Four models were recalled. Six models were brought into conformity as a result of this investigation. In addition, some online marketplaces were instructed to remove the concerned products from their platforms.¹

MSAs registered the tested products in ICSMS² and issued warnings in serious cases via [Safety Gate](#), the EU's rapid alert system for dangerous, non-food products.

Enforcement challenges were highlighted, particularly in relation to the reappearance of withdrawn products on alternative distribution channels.

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

PSA 11 identified significant levels of non-compliance among the sampled PPE footwear products, particularly regarding antistatic properties, impact resistance and documentary requirements. Although the results are not representative of the overall market due to the risk-based sampling approach, they suggest that both product performance and compliance information

continue to require close market surveillance attention. The findings underline the need for manufacturers to ensure ongoing conformity of production with the approved type and for authorities to maintain coordinated surveillance and testing to protect workers who use PPE footwear in the workplace.

RECOMMENDATIONS AND MESSAGES TO STAKEHOLDERS

Recommendations for economic operators

- A total of 83 products were tested during this campaign, of which 53 (64%) were identified with technical non-compliances related to mandatory safety requirements. Economic operators are reminded to be aware of their respective obligations under the [PPE Regulation](#), and to ensure full compliance with their obligations.
- 48 of the 83 products assessed (58%) in this campaign were found to have missing, incomplete, or incorrect markings, instructions, or safety information. Responsible economic operators are reminded of their obligation to ensure that this information is complete, accurate and available in the required national language(s).
- Products placed on the EU market must identify a responsible economic operator in accordance with EU legislation, including up-to-date contact details (name and address within the EU/EEA).
- You are obliged to ensure that PPE footwear placed on the EU market complies with all applicable European safety requirements. Placing unsafe or non-compliant PPE footwear on the market may lead to fines, recalls and liability for damages.
- Where necessary, verify the validity of conformity documentation (e.g. EU-type examination certificates) with the issuing notified body.

¹ The corrective measures are those provided by the MSAs by the deadline of 30 July 2026. While measures are continuing beyond this date, a cut-off date was established for the purposes of reporting.

² ICSMS is the EU's secure platform where MSAs share product test results and non-compliance findings to coordinate enforcement and keep unsafe non-food products off the market.

Recommendations for end users

- There are different types of PPE footwear that offer varying levels of protection. When choosing the right option, always follow national/local regulations on the selection and use of PPE at the workplace.
- Before purchasing safety footwear (whether in-store or online), consult commercial information, ask the seller and check the manufacturer's instructions for use to ensure the product provides the level of protection required for your needs.
- Check for the presence of a CE marking, an EU Declaration of Conformity (DoC), and instructions for use in the required national language(s), to ensure that the product complies with EU safety requirements and can be used correctly and safely. Also check the markings on the shoe tongue for the required protection category, manufacturer details, production date (as applicable) to verify that the footwear is suitable for the identified risks.
- Consider consulting [Safety Gate](#) alerts before purchasing to verify that the product has not been identified as dangerous or subject to a recall.
- Check the condition and, where applicable, the expiry date of safety footwear before use.
- If you detect or suspect that a product is unsafe, report it to your responsible [Market Surveillance Authority](#) and/or consider reporting it to the [Consumer Safety Gateway](#). Your feedback helps authorities identify and address potential risks.

Recommendations for the European Commission

- PPE guidelines and harmonised standards do not explicitly address the consideration of measurement uncertainty in conformity assessment, which makes its application in market surveillance decision-making unclear. It is recommended to clarify, for example, in the horizontal recommendations for use (RfUs), whether, and how, measurement uncertainty should be taken into account in the context of market surveillance testing of PPE footwear.
- Consider introducing an obligation for online platforms to make key information required under EU product legislation readily available on their websites, including the EU Declaration of Conformity (DoC), instructions for use and information about the responsible economic operator.
- Consider introducing an obligation to indicate the name and address of the original manufacturer (in addition to the legal manufacturer) in the EU Declaration of Conformity and/or the technical documentation.
- Given that 68 of 83 (82%) PPE footwear tested in this campaign was found to be non-compliant on the EU market, continued support for joint actions in the area of PPE footwear is recommended.
- Continue strengthening cooperation between customs authorities and market surveillance authorities across the EU to improve the identification and control of non-compliant PPE footwear entering the market.
- Promote the use and visibility of the [Consumer Safety Gateway](#).
- Enhance the SAGA tool to assist MSAs assess the probability of occurrence of harm scenarios, drawing on historical data, for example, by incorporating AI supported functionalities.

Recommendations for MSAs

- Within the PPE AdCo group, MSAs are encouraged to work towards the development of EU-level guidance on market surveillance activities for PPE footwear, in order to ensure a harmonised approach to sampling and testing for market surveillance purposes, including aspects such as shoe size selection, batch number (unique ID), and the treatment of measurement uncertainty.
- Given that 68 of 83 (82%) PPE footwear tested in this campaign was found to be non-compliant on the EU market, it is recommended to increase the scope and frequency of PPE footwear assessments, including both documentary checks and performance testing. In particular, performance testing should be carried out alongside documentary checks, as one fifth of samples passed documentary checks but failed performance tests, demonstrating that relying solely on documentation, markings and instructions is not sufficient to ensure that PPE footwear placed on the market is safe and compliant.
- Strengthen cooperation between customs authorities and market surveillance authorities across the EU to improve the identification and control of non-compliant PPE footwear entering the market.
- Promote the use and visibility of [**Safety Business Gateway**](#) and [**Consumer Safety Gateway**](#) with end users.
- Remember to report tested products in ICSMS, including uploading laboratory test reports.
- Use the SAGA tool to ensure harmonised risk assessment.

Recommendations for Standardisation Organisations

- Findings from the JACOP project indicate that current test methods may not fully reflect real conditions of use. Develop more realistic test methods for professional PPE footwear that better reflect real conditions of use, in particular for the following aspects:
 - Perforation resistance – consider introducing dynamic test methods that better simulate real-life use.
 - Antistatic properties – consider assessing antistatic performance under more representative use conditions, for example by taking into account footwear ageing, including ageing of sole materials (e.g. rubber) and upper materials (e.g. leather or synthetic leather) and the influence of environmental factors such as grease and moisture. Such testing could be introduced as an additional, optional requirement.

Measurement uncertainty should be taken into account in the interpretation of test results and product assessment. Clear rules on the application of measurement uncertainty should be incorporated into harmonised standards (e.g. through informative annexes).

Part 2

WHAT IS JACOP?

The JACOP initiative aims to organise Joint Actions on Compliance of Products in the EU and EFTA countries, fostering collaboration among Market Surveillance Authorities (MSAs). The primary objectives include conducting joint product testing, assessing risks and harmonising operational methodologies. Through open dialogues, knowledge-sharing, and engaging external stakeholders, the project contributes to a secure Single Market. Key focuses involve evaluating product risks, implementing timely measures and ensuring regulatory alignment.

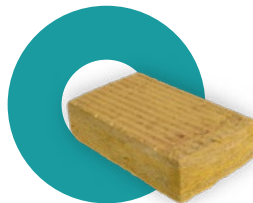
JACOP 2025 INCLUDES 11 PRODUCT-SPECIFIC ACTIVITIES COVERING 9 SECTORS

PSAs test different types of products to assess their compliance with existing legislation and regulations and take appropriate actions. The products are selected and

collected by the market surveillance authorities involved and are examined using an agreed testing plan.



PSA 1
FERTILISERS



PSA 2
**INSULATING MATERIALS
IN CONSTRUCTION
PRODUCTS**



PSA 3
**HAZARDOUS
SUBSTANCES
IN GADGETS**



PSA 4
COSMETICS



PSA 5
RADIO TOYS



PSA 6
**CONSUMER
TEXTILE CLOTHING**



PSA 7
**LIFTS AND SAFETY
COMPONENTS OF LIFTS**



PSA 8
**GAS
APPLIANCES**



PSA 9
**PPE HELMETS
(PROFESSIONAL)**



PSA 10
**PPE HELMETS
(CONSUMER)**

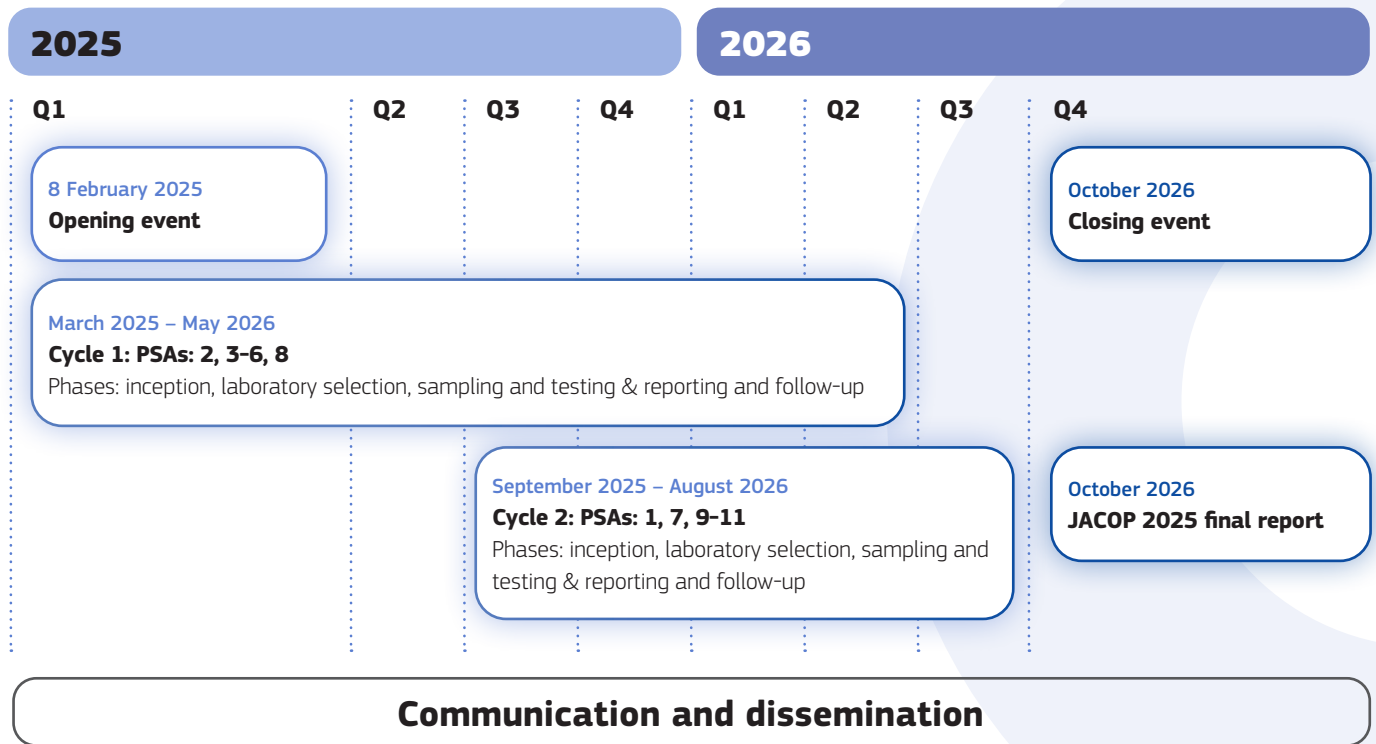


PSA 11
**PPE FOOTWEAR
(PROFESSIONAL)**

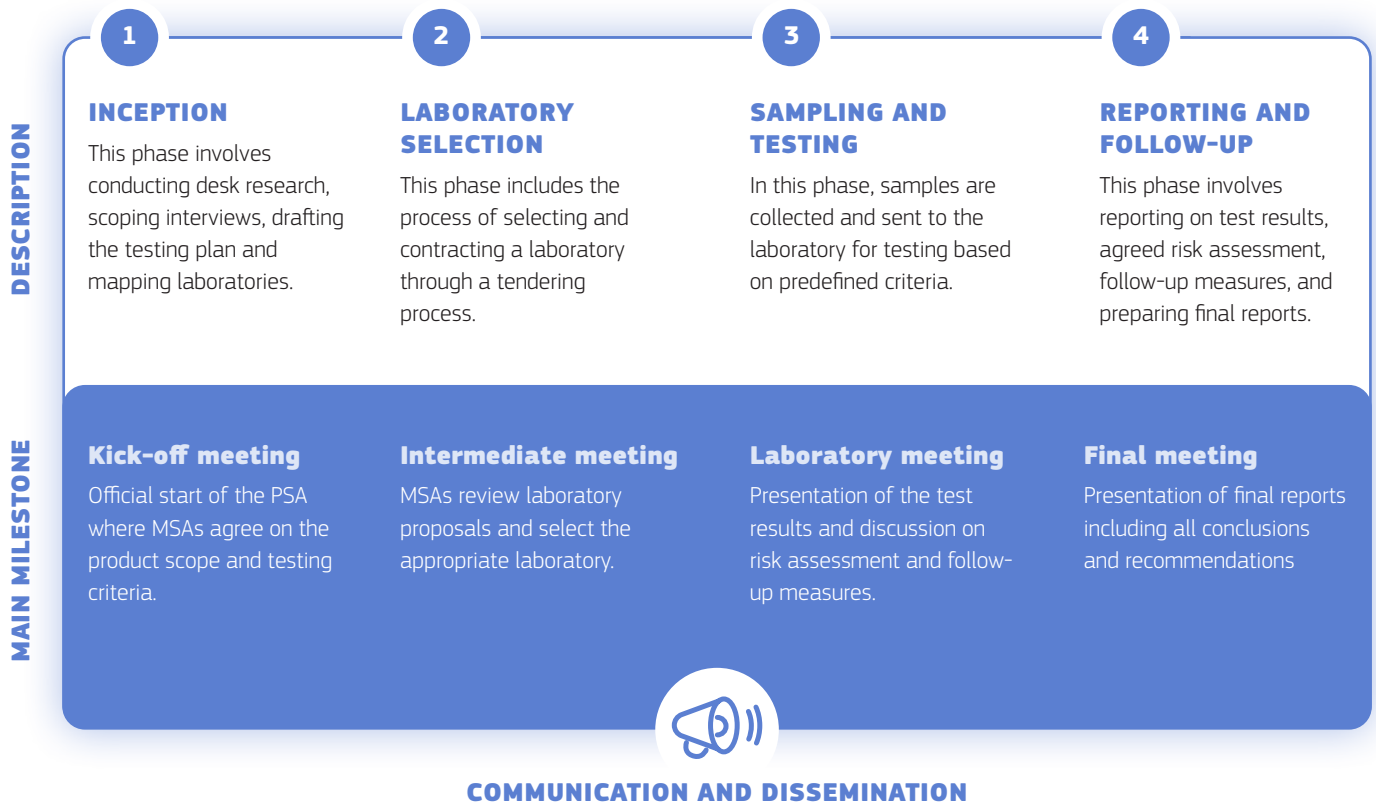
ROLES AND RESPONSIBILITIES



WORK PLAN AND TIMELINE



PROJECT PHASES



Communication and dissemination activities involve raising product safety awareness among MSAs, consumers, and economic operators through targeted campaigns, media engagement, and influencer involvement, focusing on compliance education.

PROCESS



COMMUNICATION ASSETS

For all 11 PSAs:



Article summarising the main findings of the testing activity. The article includes at least 1 image.



One **social media** visual based on the infographics.



One-page infographic summarising the main findings of the testing activity.



One infographic and one social media visual covering the entire JACOP 2025 project.

These communication assets are available in 23 EU languages + Norwegian and Icelandic.

For 3 PSAs:

PSA 4 - Cosmetics, PSA 8 - Gas Appliances, PSA 10 - PPE Helmets (Consumer)



Short **video** for social media promotion.

COMMUNICATION CHANNELS

The communication assets are disseminated using:



National and specialised media across the EU27.



Online and social media platforms.



Influencers on social media.



MSAs' national communication channels.



JACOP 2025 newsletter – a four-issue series showcasing the campaign's progress, key milestones, and major achievements.

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EUROPEAN COMMISSION

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