



March 16, 2021

Pakistan Standards & Quality Control Authority  
WTO TBT National Enquiry Point  
PSQCA Complex, Gulistan-e-Johar  
Karachi, Pakistan

Re: WTO: G/TBT/N/PAK/164, 165, and 166

Dear Pakistan Standards and Quality Control Authority:

My name is Hal McEvoy, and I am the President and Chief Executive Officer of IAAPA (International Association of Amusement Parks and Attractions). IAAPA is a diverse and dynamic community of global attractions professionals. As the largest international trade association for permanently located attractions, IAAPA unifies the attractions community, connects people to learn and grow together, and strives to promote the highest professional standards for excellence and safety around the world.

Founded in 1918, IAAPA represents over 5,000 leading industry attractions and supplier companies, consultants, and individual members from more than 100 countries. Members include professionals from amusement parks, theme parks, attractions, water parks, resorts, family entertainment centers, zoos, aquariums, science centers, museums, cruise lines, and manufacturers and suppliers.

The association's global headquarters and North America office are in Orlando, Florida, U.S. IAAPA also maintains offices in Brussels, Belgium; Hong Kong, China; Shanghai, China; and, Mexico City, Mexico. Additional information is available at [IAAPA.org](http://IAAPA.org) or through IAAPA's social media channels: @IAAPAHQ #IAAPA.

Safety is the number one priority for the attractions industry. We recognize the value of safety standards in supporting the integrity of our industry. IAAPA has played a significant role in helping governments around the world with their safety standard implementations and updates. IAAPA has also worked for the last 15 years with ASTM International, CEN (Comite Europeen de Normalisation), and ISO (International Organization for Standardization) on harmonizing their



standards related to amusement rides and devices. This effort benefits manufacturers, operators, and regulators by creating consistency in design, manufacture, installation, testing, operation, and maintenance. Rides and devices can be sold and installed around the world with the confidence they meet the global standard for safety.

We are aware through this WTO notice of Pakistan moving forward with the adoption of the ISO standards as follows:

(32) Notification Number: PAK/164 (Pakistan)

Date Issued: 2/9/2021

Products: Safety of amusement rides and amusement devices--Part-1: Design and manufacture.

PS: ISO 17842-1:2018

Title: Safety of amusement rides and amusement devices--Part-1: Design and manufacture. PS: ISO 17842-1:2018 (167 page(s), in English)

Final date for comments: 4/10/2021

(33) Notification Number: PAK/165 (Pakistan)

Date Issued: 2/9/2021

Products: Safety of amusement rides and amusement devices-Part-2: Operation and use. PS:

ISO 17842-2:2018

Title: Safety of amusement rides and amusement devices-Part-2: Operation and use. PS: ISO 17842-2:2018 (30 page(s), in English)

Final date for comments: 4/10/2021

(34) Notification Number: PAK/166 (Pakistan)

Date Issued: 2/9/2021

Products: Safety of amusement rides and amusement devices-Part- 3: Requirements for inspection during design, manufacture, operation, and use. PS: ISO 17842-3:2018

Title: Safety of amusement rides and amusement devices-Part- 3: Requirements for inspection during design, manufacture, operation, and use. PS: ISO 17842-3:2018 (14 page(s), in English)

Final date for comments: 4/10/2021

While we are very pleased to see Pakistan moving forward with the adoption of the ISO standard, we feel that it is important to point out that the ASTM International F24 standards and



CEN 13814 have harmonized content, and there is a benefit to Pakistan to allow the acceptance of rides and devices designed and manufactured to any of these recognized global standards. Some of the advantages of accepting all three standards are:

1. A consistent design in rides and equipment around the world that allows for purchasing, operational, and inspection efficiencies for manufacturers and suppliers, operators, and government regulators
2. Efficiency in the administration processes related to compliance verification when importing rides, attractions, or equipment into the country
3. Consistency in design, manufacturing quality, operation, maintenance, and inspection documentation and procedures

Our understanding is that Pakistan is on the cusp of a blossoming attractions industry, and the need for safety standards will be very important in guiding this growth. While we do not have a complete picture of the economic impacts associated with this growth, we know from experience that there is significant economic and social value to the government, manufacturers, and operators when safety standards are implemented and harmonized.

Not harmonizing safety standards or recognizing the integrity of all the aforementioned safety standard organizations does present some unintended consequences:

1. Limiting competition to only those with ISO compliant designs, limits price and design options for developers
2. A country only recognizing one standard and/or putting in standards that are outside these accepted standards would cause manufacturers and suppliers to have to make expensive and unique customizations which may keep them out of the market or raise their price significantly for such customizations. Of note, most manufacturers currently design to ASTM F24 or EN 13814 or both





3. Specialized training would need to be developed for inspection bodies relative to just one standard. Meanwhile, many inspection bodies already exist with training in ASTM F24 and EN 13814
4. Amendments to ride, attraction, and equipment documentation related to operation and inspections that are unique to only one country which can cause confusion to inspectors and operators

A substantial number of manufacturers and suppliers within the attractions industry adhere to either CEN, ASTM, or ISO. Incorporating all the international standards will mean the ability for attractions in Pakistan to have access to more competitive products and services globally. This would also facilitate the certification and inspection process for government regulators.

I would like to thank you for your time and consideration of our comments. IAAPA and our Asia Pacific team are here to assist you in any way as you formulate and implement safety standards. Here is our contact information:

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We look forward to hearing from you.

Best regards,

A handwritten signature in black ink, appearing to read "Hal McEvoy", written in a cursive style.

Hal McEvoy  
President and CEO, IAAPA  
Cc: Ms. June Ko, Vice President and Executive Director, IAAPA Asia Pacific

