

## Questions for the IEC Ex Scheme Management Committee U.S. Preliminary Concerns/Inquiries

Concern #	<i>IECEX 02 relative text</i>	Inquiry	Given Example of Inquiry
1	<p><b>Definitions, 3.15</b></p> <p><i>National differences—those requirements or test parameters in the corresponding national standard which, when applied to equipment complying only with the standard accepted for use in the IECEx Scheme, might entail non-compliance of that equipment with the relevant national standard</i></p> <p><i>NOTES 1 When a requirement in the IEC standard is not implemented in the corresponding national standard, that is also a national difference.</i></p> <p style="padding-left: 40px;"><i>2 Those restrictive requirements in a national standard, which do not deviate from the criteria included in the corresponding standard accepted for use in the IECEx Scheme, but which limit the possibility to offer the relevant equipment for sale in the country concerned, are also considered to be national differences.</i></p>	<p>Certain requirements in national installation sheets/codes could arise that may otherwise restrict an IECEx certified product from being installed in the U.S.</p> <p>Is a difference in an installation practice considered a deviation under the scheme?</p> <p>Where a given installation prescribes the use of equipment certified to the 2-Division system, is this considered a national deviation?</p> <p>If there are two parallel systems for classifying areas in the U.S., does this constitute a national deviation?</p>	<p>With regard to IECEx 02, Subclause 3.15, National Differences, is it the intent that the imposition of any requirements besides those in the IEC standards are considered national differences? For example, in the U.S. ordinary location requirements are applied and FCC regulations may apply; Canada has similar requirements; in the EU the EMC or other Directives may apply.</p>

Concern #	IECEX 02 relative text	Inquiry	Given Example of Inquiry
2	<p><b>Definitions, 3.15</b></p> <p><i>National differences—those requirements or test parameters in the corresponding national standard which, when applied to equipment complying only with the standard accepted for use in the IECEx Scheme, might entail non-compliance of that equipment with the relevant national standard</i></p> <p><i>NOTES 1 When a requirement in the IEC standard is not implemented in the corresponding national standard, that is also a national difference.</i></p> <p><i>2 Those restrictive requirements in a national standard, which do not deviate from the criteria included in the corresponding standard accepted for use in the IECEx Scheme, but which limit the possibility to offer the relevant equipment for sale in the country concerned, are also considered to be national differences.</i></p>	<p>Normative Reference standards contained in the IEC standard and associated National Standards. If these are not also harmonized, but employed by concerned ACB, does this constitute National Deviations?</p>	
3	<p><b>5.8</b></p> <p><i>The final objective of the IECEx Scheme is world-wide acceptance of one standard, one certificate and one mark.</i></p>	<p>In regard to the “one mark” issue, electrical fire and shock hazards are generally required to be demonstrated by third party independent test lab certifications in the U.S. The acceptability of these 3<sup>rd</sup> party certification organizations is at the discretion of the Inspection Authorities.</p> <p>If the U.S. required an associated U.S. national mark with the IECEx marking as evidence of electrical fire and shock hazard acceptance, would this constitute a national deviation?</p>	<p>Non U.S. ACB submits ATR or IECEx certificate to U.S. ACB demonstrating compliance to IEC standard and IECEx Scheme. The ATR or certificate does not demonstrate evaluation to electrical fire and shock hazardous. U.S. ACB employs electrical fire and shock hazard standard to product. Product passes, U.S. ACB issues authorization to apply XX-IECEx marking.</p> <p>Where XX signifies the U.S. ACB’s mark in conjunction with the IECEx as proof of evaluation for electrical fire and shock hazard compliance.</p>

Concern #	<i>IECEX 02 relative text</i>	<i>/Inquiry</i>	<i>Given Example of Inquiry</i>
4	None	Compliance to newly revised editions of a harmonized IEC standard.	U.S. requires the manufacturer bring product into compliance with newly revised standard editions.  Do other countries of the IECEX Scheme have such a policy? If not, and they accept certifications based on previous editions, this could create concerns in the U.S.