

EXTAG TRAINING WORKSHOP
FORTALEZA 2013

TRADE AGENTS AND
LOCAL ASSEMBLERS

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Chair - ExTAG



WHEN YOU NEED TO BE SURE



- Two tasks allocated at Calgary
 - Amend the draft OD on Trade Agents
 - Create a draft OD relating to Stockist/Assemblers
- WG11 met at Buxton in June, during the series of IECEx meetings, and also by email
- ExMC/891A/CD contains both outputs and is for discussion at the ExMC this week
- This presentation provides an opportunity for ExCBs to hold a preliminary discussion on both subjects, to shorten the discussions at ExMC

TRADE AGENTS



WHEN YOU NEED TO BE SURE



The logo for SGS, featuring the letters 'SGS' in a bold, grey, sans-serif font. A thin orange vertical line is positioned to the right of the 'S', and a thin orange horizontal line is positioned below the 'S'.

TRADE AGENTS

- The company “TRADE” wants to present themselves to the market as the “manufacturer” of a product actually made by “OEM”
- If the name of OEM can appear on the product as well as TRADE, no problem. Use the certificate issued to OEM. No additional requirements.
- If the name of OEM cannot appear on the product, but only that of TRADE, invoke the specific procedures in ExMC/891A/CD



TRADE AGENTS

- If TRADE is presented to the market as the de-facto manufacturer:
- A certificate must be issued in the name of TRADE
- This must be supported by TRADE's own
 - ExTR
 - QAR
- The actual hard copy of both the ExTR and QAR will cross-refer to OEM's ExTR and QAR
- The ExTR and QAR summary will not show OEM



TRADE AGENTS

- Application from TRADE to include:
- The number of the certificate issued to OEM
- (Alternative product name or type designation)
- Declaration by OEM
- Declaration by TRADE
- Copy of marking to be applied by OEM but showing TRADE as de-facto manufacturer
- Copy of the contractual agreement between OEM and TRADE



ExTR ISSUED TO TRADE

- Confirms all items necessary for the application have been checked
- Records the marking for TRADE to be applied by OEM
- Records checking the Instruction Document to be supplied by TRADE
- Refers to all relevant ExTRs issued to OEM
- Need not contain any other technical information



QAR ISSUED TO TRADE

- Confirms TRADE's ability to comply with all the application information
- Confirms an appropriate QAR is in place for OEM
- Confirms compliance with the shortened list of requirements from ISO/IEC 80079-34 given in Annex A to the Operational Document, including:
 - Organisation and Quality Systems
 - Control of Documents (including literature and instructions)
 - Control of records
 - Product Realisation
 - Control of non-conforming product

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IECEX CERTIFICATE ISSUED TO TRADE

- New Certificate therefore new number
- TRADE is shown as Applicant and Manufacturer
- May refer to a different product name or type designation, if used by TRADE
- ExTR and QAR numbers are those issued to TRADE
- Otherwise identical to certificate issued to OEM



MORE THAN ONE ExCB?

- Process simple if only one ExCB involved in all parts of the process
- Multiple ExCBs can cause complications but will work provided all play their part and communicate with one another
- Only the ExCB responsible for issuing the original ExTR and Certificate to OEM can issue the ExTR and Certificate to TRADE
- Separate ExCBs may be responsible for QARs at OEM and TRADE

- The Certificate issuing ExCB must ensure that both QARs are in place and remain current, using the IECEx database process
- The QAR issuing ExCB for OEM must ensure that interfacing with TRADE takes account of any “after-sales” issues including product recall, and cross refers to TRADE
- The QAR issuing ExCB for TRADE considers particularly the items from Annex A of the Operational Document and also cross refers to OEM

LOCAL ASSEMBLERS



WHEN YOU NEED TO BE SURE





LOCAL ASSEMBLERS (LA)

- Final assembly by selection of design choices available on an IECEx Certificate.
- Performed by a sales/distribution centre
 - Part of manufacturer organisation
 - Agent subject to rigid contract
- Normal industrial practice
- Example: Fitting an Ex e junction box with terminals to fulfil a specific customer order



LA PROCEDURES

- Manufacturer makes application to the ExCB responsible for the QAR
 - Does the CoC issuing ExCB need to be informed ?
- Includes written procedure (and contract with agent) to be applied to ensure final product is compliant
 - Includes all information relevant to compliance with this Operational Document
- Application processed as an extension to existing QAR
 - Possibly as a desktop exercise between QAR visits



LA PROCEDURES

- ExCB monitors all aspects of the manufacturer's LA procedure along with normal QAR activity
- This includes evidence the manufacturer should collect that the procedure is working correctly
- Manufacturer's internal audit procedure to record operation of procedures with all LAs
- QAR summary on IECEx web site shows each LA
 - Name, Address, Scope of activity
 - Inserted in "Comment" field of QAR summary



MANUFACTURER'S LA PROCEDURES

- Description of contract or agreement confirming the LAs acceptance of responsibility within the process
- How the necessary information is passed to the LA and how it is kept up to date
- How identified components are transferred
- How evidence of correct receipt is maintained
 - Identification retained for traceability
 - Undamaged



MANUFACTURER'S LA PROCEDURES

- Process for final marking and supply of documentation including instructions
- Process for LA final inspection and transmission of records to the manufacturer
 - Sufficient for product recall
 - Customer complaints
- Identification on the product of which LA placed the product on the market
 - Example: Code within the product serial number

- LA shall have a QAR in their own right or have an ISO 9001 QMS Certificate issued by a certification body accredited by an IAF member
- LA shall not machine Flameproof (Ex d) enclosures but may add holes (e.g. for cable entries) to an Ex e enclosure
 - Machining of Ex d enclosures is considered to be manufacturing and not assembling

- The LA shall use only parts supplied by the manufacturer unless by specific agreement local sourcing is permitted for
 - Standard industrial items such as screwed fasteners
 - Items clearly and uniquely defined by an IECEx Certificate such as Component Certified terminals
- Items which might affect the explosion protection concept (other than identified by an IECEx Certificate) shall not be locally sourced
 - Example: Gasket materials

- For each generic type of product, the manufacturer shall inspect a completed sample from each LA before product is dispatched
- If internal wiring of equipment is included in the scope of the activity, a full definition of every aspect of the wiring shall be provided by the manufacturer
 - Routing
 - Securing
 - Connection preparation

- The manufacturer shall ensure that all relevant LA personnel have adequate training
 - Fundamentals of Explosion Protection
 - Interpreting manufacturing drawings
 - Interpreting process instructions
 - Understanding importance of records
- Failure to follow the procedures “to the letter” results in production of uncertified equipment

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