** ExTAG/692/R**

**August 2022**

**INTERNATIONAL ELECTROTECHNICAL COMMISSION SYSTEM FOR CERTIFICATION TO STANDARDS RELATING TO EQUIPMENT FOR USE IN EXPLOSIVE ATMOSPHERES (IECEx SYSTEM)**

**Circulated to: ExTAG – Report from ExTAG WG 06 Testing at Other Locations**

This document contains a report from the 23 August 2022 meeting of the ExTAG WG 06 Testing at Other Locations.

The WG06 wish to provide ExTAG with a status report on their work regarding revision to OD 024 *IECEx Certified Equipment Scheme – IECEx Rules of Procedure covering testing, or witnessing testing at a manufacturer’s, user’s or third party facility.*

Included in this report are recommendations for progressing the revision of OD 024, with the WG06 planning to hold its next meeting on 17 November 2022

***IECEx Secretariat***

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**ExTAG WG 06/2022-02**

**IECEx ExTAG WG6 Remote Meeting**

**23rd August 2022**

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**INTERNATIONAL ELECTROTECHNICAL COMMISSION SYSTEM FOR CERTIFICATION TO STANDARDS RELATING TO EQUIPMENT FOR USE IN EXPLOSIVE ATMOSPHERES (IECEx System)**

**MEETING AGENDA + REPORT**

**Remote Meeting of IECEx WG**

**Working Group ExTAG WG6 – Rules of procedure for Testing at Other Locations**

**on Tuesday 23rd August 2022**

**(1200 – 1520 UTC Time)**

**Attendance**

**Chris AGIUS**

**Geoff BARNIER**

**Jim Munro**

**Nils BLESHOY**

**Eduardo GALERA**

**Katy HOLDREDGE**

**Neil JONES**

**Bill LAWRENCE**

**Jasmin OMEROVIC**

**Otto WALCH**

**Tim Duffy**

**Geoff SLATER**

**Mark Amos**

**Wayne Thomas**

**Dave Adams**

| **SUBJECT** |
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| 1. **OPENING OF THE MEETING (Start 1200 UTC)**     Chris Agius, IECEx Executive Secretary and WG6 Convener opened the meeting welcoming members noting that is has been some time since the last meeting and introduced Mr Geoff Slater of the IECEx Secretariat in his role as Compliance Manager taking over the role from Mike Roy, whom has reduced work time with the Secretariat.  The Convener then called for introductions. |
| 1. **ExTAG WG6 Terms of Reference and Membership**   Members to confirm ExTAG WG6 Terms of Reference and Membership (as indicated on IECEx Website <https://www.iecex.com/members-area/working-groups/?WorkingGroup=36&action_doWorkingGroupSearch=Search>  Title: Rules of Procedure for testing at other locations  To develop and maintain procedures (OD 024) and other documentation related to testing performed at test facilities other than an ExTL or Additional Testing Facility. Additional aspects include the need to ensure that testing performed utilizes adequate facilities, test equipment and that the staff are competent and have the adequate expertise for the relevant standard / type of protection  The meeting reviewed the current Terms of Reference for this WG06 and re-confirmed them without change. |
| 1. **APPROVAL OF THE AGENDA**   Members are asked to consider any other items for raising that are not listed on the agenda and then approve the agenda as presented here or as amended to include agreed additional items.  The meeting approved the Agenda with the addition of the following for raising in Other business:   * Feedback on the application of the On-Line OD 024 register as requested by Katy Holdredge |
| 1. **IECEx OD 024** – Testing at other locations. Status   Members to note publication of OD 024 Edition 4.0 as published April 2021.  <https://www.iecex.com/publications/operational-od/>  The meeting noted the current status of OD 024 being Ed 4.0 as published in April 2021 recalling the following documents as approved by the IECEx Management Committee:  ExMC/1675/DV – Draft Edition 4.0 of OD 024  ExMC/1685/RV – Result of voting |
| 1. **IECEx OD 024 – Testing at other locations. Consideration of Updates**   Members may recall a previous request to provide greater clarity over the definition of *“Third Party Testing Facility*”  In addition, the meeting will be asked to note the comments submitted with the voting on Draft edition 4.0 of OD 024 (re ExMC/1675/DV) and issued as ExMC/1685/RV). While comments from AU, CA, CN, RU and DE were related mainly to editorial comments which were incorporated in the final Edition 4.0, some of the **DE** Comments related to technical or significant changes to the document and it was agreed, at the time, with DE that these comments be referred to the next meeting of ExTAG WG6, in order for the Edition 4.0 to proceed to publication.  Therefore, this meeting will be asked to consider;   1. The definition for “*Third Party Testing facilities*” as included in the inserted Word file below as Draft OD 024 Edition 4.1 Clause 3.12 2. The DE Comments identified in the inserted word file with yellow highlighting 3. Additional Discussion Points – see inserted word file   The commenced consideration of item 1 above with an initial attempt to arrive at a definition for “Third Party Test Facilities”. Following lengthy discussion and noting the different definitions for manufacturer test facility, test facility, user test facility and third party test facility, the meeting concluded that the best way forward was to use the one term “**Test Facility**” and define it as covering manufacturer, user and third party test facility and then use the one term “test Facility” throughout the document.  Therefore, the meeting agreed to the following definition for “Test Facility” and that an editorial change be made throughout the document.  *‘test facility’* clause 3.9 would include manufacturer, user test facility and third party testing facilities. – this was included in the new draft of OD 024.  The meeting then embarked on consideration of items 2 and 3 and agreeing that changes be made in the preparation of a Draft version Edition 5.0 of OD 024.  Refer to Annex A and B for the meetings conclusions on the issues under item 2 and 3 above.  In consideration of items 1, 2 and 3 above, the meeting commenced drafting work on a Draft Edition 5.0, with the embedded file below being the stage that the meeting managed during the meeting time available, and agreed to continue working on this at its next meeting.    However, the meeting wish to report to ExTAG 2022 meeting of their progress along with the following additional Recommendations.  **Recommendations to ExTAG**   1. **ExTAG WG6 works towards a regime that enables the mutual acceptance of OD 024 assessments conducted by ExTLs and ExCBs and report this to ExMC** 2. **ExTAG WG6 prepares a standard OD 024 Assessment Report template form for use by all ExTLs / ExCBs, with ExTLs to provide samples of report forms they currently use** |
| 1. **Proposals to be put before ExMC**   Members to consider proposals to be put to ExMC in light of discussions concerning item 5 above, that may impact on any other IECEx publications.  Given the discussions of the meeting, it was agreed that the ExTAG WG 06 continue working on a draft Edition 5.0. Given the work to be done, there are no proposals to be put to the 2022 meeting of the ExMC )IECEx Management Committee) other than to report on progress. |
| 1. **Other Business**   Feedback on new Testing Register  Katy Holdredge gave her feedback on use of the IECEx On-Line OD 024 Testing Register and suggested issues, along with other members of the WG06:-   1. Header of Testing register column headings disappear as one scroll downs   Mark A to review the viewing capabilities   1. Inconsistencies of text being inserted by the ExTLs within the organisation field is noted and the WG6 to reconsider the need for this column? 2. Ability to filter results are not clear with Mark A advising that there is a sorting feature and not a filtering / sort feature. Mtg noted an export feature would be useful 3. Nils suggested a dropdown list for Standards – Secretariat to explore the possibilities with IT   The meeting agreed for the Secretariat, to investigate these as improvements, with IT. |
| 1. **Next Working Meeting**   The meeting agreed for the next meeting to be Scheduled for 17 November 2022 starting at UTC 1200 Zoom. |
| 1. **Close of Working Group Meeting**   The Convener thanked members for their attendance and valuable contributions noting the great progress made today and apologised for running the meeting a little over time but was sure that all agreed it was worthwhile and declared the meeting closed at 1520 UTC |

**Annex A: ExTAG WG06 Discussion on remaining DE Comments** ExMC/1685/RV

Comments DE 02, 05, 06, 07 were considered during the ExTAG WG 06 meeting with the remainder of DE comments already captured in the current Edition 4.0 of OD 024

| **MB/NC** | **Line number**  (e.g. 17) | **Clause/ Subclause**  (e.g. 3.1) | **Paragraph/ Figure/ Table/**  (e.g. Table 1) | **Type of comment** | **Comments** | **Proposed change** | **Observations of the secretariat** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| DE01 |  |  |  | ge | The DE MB is in favour of the revision of OD 024, however, requests that the following comments are taking into account. |  |  |
| DE02 |  | 4.1 |  | te | The witness testing of the IEC Ex System is a very effective approach to accelerate the testing process between ExTLs/ExCBs and manufacturers. Establishing an Online register may even facilitate the use of test facilities.  Unfortunately, the current practice has shown, that the formalism between the contract partners has unreasonably increased. A manufacturer’s test facility cooperating with several ExCBs/ExTLs must today conclude a contract between all cooperating ExCBs/ExTLs. The test facilities have to be assessed during an initial audit, re-validations and re-assessments. In practice this could result in several audits per year with several ExTLs with the same content.  Hence, to avoid unnecessary bureaucracy and workload for both, the ExTL/ExCB and the test facility, a similar process as practiced with the QAR is recommended. This could be effectively combined with the Online Register for testing agreements. If a test facility is listed in the Online Register by one ExTL/ExCB, all other ExTLs/ExCBs can refer to this registration and perform off-site/witness testing with that testing facility in the scope of the listed standards. The assessments are only performed by one ExCB/ExTL, which is responsible for the quality and conformity of the test facility.  The proposal of the DE MB is a consequent continuation of the peer to peer approach in the IECEx-System. | Include in clause 4.1:  4) The test facility shall undergo an initial assessment and re-assessments by one ExTL. These assessments may be witnessed by the associated ExCB. These ExTLs/ExCBs are responsible for the conformity of the test facility. After successful initial audit, the test facility is listed in the Online Register of test facilities (see clause 4.4)  ~~Delete in 4.3~~  ~~3) the facilities and services to be provided by the test facility~~ *~~(this would be covered in the online register)~~*  ~~4) The right of the initial assessment and re-assessment of the test facility by the ExTL and the right of the associated ExCB to witness these assessments~~  ~~Modify paragraph 1 in 4.8.2 (see also DE03)~~  ~~The continued validity of the initial assessment or re-assessment shall be evaluated~~ ~~during each subsequent off-site or witness testing project visit.~~ 18 months after the assessment/re-assessment. | While the principle of this proposal is sound, This is a significant change that warrants discussion at the ExTAG WG6 next meeting, to prevent any delay in publishing the changes in ExMC/1675/DV.  **Action: Refer for discussion at next ExTAG WG6 meeting**  **Result of 220823 Mtg covered by Recommendation to be made to ExTAG,** |
| DE03 | - | Clause 4.3 | - | ed | There is a reference to Clause (d). I could not find this Clause. Is it (4)? | Please correct the reference. | Correct. The reference should be to item (d) of the list of 4.3. The list of 4.3 has been corrected to use a) to e) |
| DE04 |  | 4.4 |  | te | Online Register of testing agreements  A test facility shall be registered in the IEC Ex Online register with detailed information regarding their test capabilities. A manufacturer may not accept, that those internal data of his test facility are made public to any competitors. Manufacturers holding such an agreement prior the 4th edition of OD024 may not accept this change under the existing contract. | Add to 4.4 2nd paragraph:  ….., ~~at the~~ ~~decision~~ in agreement ~~of~~ between the ExTL **and the test facility** | This seems a reasonable request especially for previously established arrangements where the rules required that such information was confidential and kept only by the Secretariat.  Action: Agree with the request as it is understood that this was envisaged. Included reference to “*in consultation with the test facility”* at end of second sentence of second paragraph. |
| DE05 |  | 4.8.2 |  | te | The formal aspects of the annual re-validation as listed in clause 4.8.2 may be covered during the onsite visits to the test facility. If no test activities have taken place during one year, the current text requires a new assessment comparable to the initial assessment each year. This leads to an unreasonable increase of bureaucracy in the witness testing scheme. Especially if a manufacturer cooperates with several ExTLs, the extend of assessments would not be acceptable for the test facility.  The re-validation period for the QAR assessment is 18 months and should be accepted also for the test facility re-validation. | The initial site assessment results shall be re-validated **~~each year~~ every 18 months**  If there has been no activity over the previous ~~year~~ 18 months | While the principle of this proposal seems reasonable, This is a technical change that warrants discussion at the ExTAG WG6 next meeting, to prevent any delay in publishing the changes in ExMC/1675/DV.  **Action: Refer for discussion at next ExTAG WG6 meeting**  **Result of 220823 Mtg**  **Proposal not accepted as the ExTLs / ATFs that are not accredited to ISO/IEC 17025 are subjected to annual surveillance** |
| DE06 | - | Clause 4.8.2 | - | ge | Currently it is required that the re-validations are carried out at least once per year by on-site visits. Due to the positive experience with the application of OD 060 (remote assessments) we propose that OD 024 assessments/re-assessments/re-validations should also be allowed to be carried out as remote procedures. | Add remote procedure. | While the principle of this proposal seems reasonable, This is a technical change that warrants discussion at the ExTAG WG6 next meeting, to prevent any delay in publishing the changes in ExMC/1675/DV.  Agree with the DE observation that the use of Remote assessments provision of OD 060 have proven most effective and reliable.  **Action: Refer for discussion at next ExTAG WG6 meeting**  **Result of 220823 Mtg**  **Agreed to make use of Remote Assessment provisions with Katy H to provide suggested text** |
| DE07 | - | Clause 4.11 | - | ge | In our opinion, it is a confidential information if the tests have been carried out as witness tests. | The last sentence of clause 4.11 shall be deleted. | This requirement has been long standing and a result of requests from both ExCBs that are to accept ExTRs as well as Regulators that seek to recognise such testing arrangements.  This is a change to the general approach for completion of ExTRs that warrants discussion at the ExTAG WG6 next meeting, to prevent any delay in publishing the changes in ExMC/1675/DV.  **Action: Refer for discussion at next ExTAG WG6 meeting**  **Result of 220823 Mtg**  **Recommend to ExTAG WG1 that the instructional text/comment on the ExTR Coer Page be miodified to remove reference to whom performed and/or witnessed the test – see extract below**  **1. Each test not performed by ExTL staff at the above ExTL address shall be itemized with an indication of who performed and/or witnessed the test, and where the testing was performed and/or witnessed.**    **.** |
| DE08 | - | Annex B & C | - | ed | The titles Annex B & C have to be changed to Annex A & B. | Please correct the reference. | Agreed. Thank you. Editorial corrections made |
| DE09 |  | Annex B |  | te | Paragraph 4 of Annex B is not required, when the test facility is listed in the Online register and the surveillance is performed by the responsible ExTL/ExCB. | Delete paragraph 4 of Annex B,  (see comment DE01) | Not sure what is being proposed. Therefore, suggest referring for discussion at next ExTAG WG6 meeting. |

**Annex B: ExTAG WG06 Meeting Consideration of additional Points raised by Dr Jim Munro**

**Discussion Points during the August 2022 ExTAG WG 06 Meeting**

**From:** Jim Munro <[mail@jimmunro.org](mailto:mail@jimmunro.org)>   
**Sent:** Thursday, 23 December 2021 9:43 AM  
**To:** Chris Agius <[Chris.agius@iecex.com](mailto:Chris.agius@iecex.com)>  
**Cc:** Mark Amos <[mark.amos@iecex.com](mailto:mark.amos@iecex.com)>  
**Subject** OD 024

Chris

I have had a few scenarios come up with OD 024 recently that indicate it could do more clarity on some situations regarding assessment by the ExCB/ExTL and requirements for agreements and registering them.

Scenario 1

The body does testing at the remote location using all its own test equipment and its own staff

* I can’t see the need for assessment of the test location, with possible exception of the environment
* I also can’t see the need for an agreement (and hence also not register agreement on website)

CA remark: Agree.  To me this is outside the scope of OD 024 and should be covered the ExTL’s own internal procedures for conducting testing away from their own facilities.

2022-08-23 ExTAG WG 06 Decision: JM to provide suggested text for inclusion

Scenario 2

Unit verification - witnessed

* This will normally be a one off situation
* It would normally require an assessment (but it could be quite limited as the quality system is not likely to be relevant)
* But if only the one occasion, I can’t see the need for an agreement (or its registration)

CA remark: Agree.  This may require some WG6 discussion as now that we have the public information on the OD 024 register, if the ExTR was to be used to gain a national approval/certificate, the receiving CB may want to see the facility on the register?  I suggest we discuss this in WG6

2022-08-23 ExTAG WG 06 Decision: Agree to retain current wording but add wording to clarify the need for an agreement and registration on OD 024 register for one-offs

Scenario 3

Similar to 2 above, but QAR issued and normal certificate (you may also hear from XXXX on this one)

* There has been an assessment and there is an agreement
* However, the body is not expecting to do any further testing there and so questions the need to register it on website
* I believe it should be registered

CA remark: Agree.  If we are talking about Unit verification there should not be a QAR as the Certificate identifies the specific item covered by serial number or other means.  The On-Line certificate template system adjusts the text of the certificate when the ExCB selects Unit Verification.  Not sure why XXXX would want to address a QAR for Unit verification, unless I am missing the point.

All good points for discussion in ExTAG WG6.

2022-08-23 ExTAG WG 06 Decision: Agree to retain current wording but add wording to clarify the need for an agreement and registration on OD 024 register for one-offs