

INTERNATIONAL ELECTROTECHNICAL COMMISSION

IEC SCHEME FOR CERTIFICATION TO STANDARDS FOR SAFETY OF ELECTRICAL EQUIPMENT FOR EXPLOSIVE ATMOSPHERES (IECEX SCHEME)

Ex Management Committee, ExMC

Compilation of Comments received concerning document:

ExMC/81/CD : Draft Operational Decision "Guidance for the Preparation of IECEx ATRs by Issuing ACBs and the Processing of IECEx ATRs by Receiving ACBs"

Document ExMC/81/CD was issued in January 2001 in response to decisions reached at the Braunschweig 2000 ExTAG and ExMC meetings .

This document is a compilation of further comments received from AU and RU.

These comments are to be considered during the 2001 ExMC Meeting, in Bern.

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COMPILATION OF COMMENTS ON COMMITTEE DRAFT

Reference number of the CD ExMC/81/CD	Date of Circulation: 2001 01
IECEx MC or TAG ExMC and ExTAG	Date of issue of CC: 2001 07

Title of the Committee Draft
Draft Operational Decision “Guidance for the Preparation of IECEx ATRs by Issuing ACBs and the Processing of IECEx ATRs by Receiving ACBs”
The above-mentioned document was circulated to ExMC Members, ACBs, Candidate ACBs, ExTLs and Candidate ExTLS with a request that comments be submitted
Comments received – AU, RU
ACTION:
Comments to be considered during the 2001 ExMC meeting in Bern

Annex

ExMC/97/CC

Date 2000 07	Document ExMC/81/CD
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No.	National Committee	Clause/Item	Type of comment (General/ Technical/ Editorial)	Comments	Proposed change	Observations by the Secretary
1	AU	General	General	The document needs to be put in a proper format.	IEC format for standards, especially definitions and acronyms	agreed
2	AU	General	General	The document should be restructured	Structure: <ol style="list-style-type: none"> 1. Content of ATR's 2. Recording results of assessments and tests 3. Issuing and receiving ATR's and parts of ATR's 	agreed
3	AU	1.1	Technical	Sound engineering rationale is subjective	<p>Add: The sound engineering rationale shall be supported by such things as calculation, nominating relevant theories or laws and nominating references for those theories or laws.</p> <p>Reason: The subjectivity of terms such as sound engineering rationale and the fact that “creep” or “incremental” sound engineering rationale can eventually lead to unsound engineering rationale.</p>	For discussion at the ExMC meeting

Annex

ExMC/97/CC

Date 2000 07	Document ExMC/60/CD
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No.	National Committee	Clause/Item	Type of comment (General/ Technical/ Editorial)	Comments	Proposed change	Observations by the Secretary
4	AU	1.2	Technical	Sound engineering rationale for omission of tests	<p>Include: Omission of tests and the sound engineering rationale behind that decision should be submitted to ExTAG for review.</p> <p>Reason: Oversight is provided on sound engineering rationale decisions. It will provide an opportunity to develop a database of such decisions, which may provide valuable information for future review of standards.</p>	For discussion at the ExMC meeting
5	AU	1.3	Technical	Doubt about the engineering rationale.	<p>Add: The doubt shall be raised with ExTAG for review or the consensus reached shall be forwarded to ExTAG for review.</p> <p>Reason: Oversight is provided on sound engineering rationale decisions. It will provide an opportunity to develop a database of such decisions, which may provide valuable information for future review of standards.</p>	For discussion at the ExMC meeting

Annex

ExMC/97/CC

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No.	National Committee	Clause/Item	Type of comment (General/ Technical/ Editorial)	Comments	Proposed change	Observations by the Secretary
6	AU	1.5 Para 1	Technical	Reference to the rationale for the selection of models should be included in the 1st sentence of Clause 1.5.	Reword to read: Where the ATR covers a range of models or product variants, the ATR shall clearly detail the rationale for selection of representative models, and the relationship of variants to the basic model and how these have been dealt with during the test and assessment.	For discussion at the ExMC meeting
7	AU	2.2	Editorial	This requirement appears to be a part of the Draft section 3	Move this requirement to section 3 in the draft. Reason: It is an issuing and receiving matter not an ATR content matter.	For discussion at the ExMC meeting
8	AU	2.4	Technical/ Editorial	Definitions for Sections 1 and 2 are missing	Definition of Section 1 and Section 2 are required. Reason: Transparency for outside bodies. Clarity for potential participants and users of the IECEx scheme	For discussion at the ExMC meeting

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ExMC/97/CC

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No.	National Committee	Clause/Item	Type of comment (General/Technical/Editorial)	Comments	Proposed change	Observations by the Secretary
9	AU	2.5	Technical	Links between Section 1 and 2 are missing	Add: There shall be a clear relationship between each part of Sections 1 & each part of section 2 so that test and assessment results are obvious. Reason: To provide transparency and clarity of test and assessment for receiving ACBs.	For discussion at the ExMC meeting
10	AU	2.6	Technical	This infers a clause by clause assessment and a clause by clause recording of results.	Add: The testing and assessment results shall be recorded on a clause by clause basis of the relevant standards. The ATR or evaluation record shall show the results of testing and assessment on a clause by clause basis. Reason: Making it clear about what is required in an ATR.	For discussion at the ExMC meeting
11	AU	2.8	Technical	Enclosures and attachments	Add: There shall be clear links between Section 2 and any enclosures or attachments. This means that enclosures and attachments shall have unique document identifiers and conform to ISO 9000 requirements for document control. Reason: Transparency and auditability.	For discussion at the ExMC meeting

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No.	National Committee	Clause/Item	Type of comment (General/Technical/Editorial)	Comments	Proposed change	Observations by the Secretary
12	AU	3.1 2nd sentence	Technical	Sentence not clear enough	<p>Delete the final sentence and replace with:</p> <p>The ATR's are generally used for obtaining certification from other bodies. However it does not prevent them from being used for internal acceptance of the testing by the manufacturer or to support end-user requests to review Ex certificated equipment.</p> <p>Reason: As the move to "duty of care" continues by users of Ex equipment there is likely to be a move to not just accepting an Ex certificate - they may require a more in depth review of the equip't.</p>	For discussion at the ExMC meeting
13	AU	3.5 line 1	Editorial	The use of the word 'version' in line 1 of 3.5 is incorrect.	Replace 'version' with 'edition'	agree
14	AU	3.5	Technical	IECEx evaluation record forms	<p>This should be in section 2 of this document.</p> <p>Reason: It is a content/format issue not an issuing/receiving issue</p>	

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ExMC/97/CC

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No.	National Committee	Clause/ Item	Type of comment (General/ Technical/ Editorial)	Comments	Proposed change	Observations by the Secretary
15	AU	Proposed new sections	Technical	Withdrawal/Reissue of ATRs	Where it becomes necessary to correct an ATR that has been issued, the revised ATR must be clearly identified by the use of a new number or by adding a suffix to the original number. The revised ATR must include a reference to the report it supersedes and an explanation of what has been changed. Copies of the revised report must be provided to the applicant for the report and to any ACB, which has been provided with a copy of the original report. A copy of the superseded ATR cover page shall be submitted to the ExMC Secretary	For discussion at the ExMC meeting
16	AU	Proposed new sections	Technical	<u>Dealing with Issues Found in ATRs</u>	Where a receiving ACB finds issues with an ATR that has been prepared by another ACB, the two ACBs should attempt to resolve the issues between them. When this results in a need to change the original ATR the procedure shown in Clause 5 should be followed. Where there is an interpretation issue that the two ACBs cannot agree on, the matter should be referred to the ExTAG Secretary for guidance.	For discussion at the ExMC meeting

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No.	National Committee	Clause/ Item	Type of comment (General/ Technical/ Editorial)	Comments	Proposed change	Observations by the Secretary
17	RU	General	General	<p>Relations between the participants in the IECEx Scheme in the process of issuing and receiving the ATRs and the Certificates are “most valuable in providing transparency and confidence in the IECEx Scheme by Scheme shareholders especially manufacturers users and regulators” as was reasonably remarked in the Introductory Note to the document ExMC/81/CD and they should be specified in the fundamental documents.</p> <p>To provide for “ a common approach when testing and assessing products” it is necessary to dovetail the second part of the document with the ATR forms and to write it down as instructions on how to fill in these forms in Operational Decision format. Additionally, the following should be considered:</p> <ul style="list-style-type: none"> - matters relative to nomenclature and expert examination of documentation; - problems of taking into account national deviations; - matters relative to scheme of TLs and ACBs interaction in preparing an ATR 	<p>This document should be divided into 2 parts:</p> <p>Part 1 - Procedure of issuing and receiving the ATR (paragraphs 1.3, 1.4 and partly 1.5, Sections 3 and 4).</p> <p>Part 2 – Instructions on preparing the ATR (include other material).</p> <p>The first part should be included in the IECEx 02.</p>	For discussion at the ExMC meeting