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

**Circulated to: ExTAG – IECEx Testing and Assessment Group**

**TITLE: Compilation of comments and observations on ExTAG/458/CD Draft ExTAG Decision Sheet – Location of Electrostatic Discharge Hazard Warning**

**INTRODUCTION**

This document contains the compilation of comments and originator observations received on ExTAG/458/CD Draft ExTAG Decision Sheet – Location of Electrostatic Discharge Hazard Warning

In light of the comments received a revised version, *ExTAG/458A/CD Revised Draft Decision Sheet – Location of Electrostatic Discharge Hazard Warning* has been prepared and is issued for final discussion during the 2017 ExTAG Washington meeting.

***Please inform the Secretariat immediately of any omissions or errors at-***

[***Christine Kane***](mailto:christine.kane@iecex.com)

On behalf of Mr. Julien Gauthier

***Julien Gauthier***

***ExTAG Secretary***

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| **ExCB/**  **ExTL** | **Clause/ Sub-clause** | **Paragraph Figure/**  **Table** | **Type of**  **comment**  **General/**  **technical/**  **editorial** | **COMMENTS** | **Proposed change** | **Observation**  **(to be completed by the originator)** |
| --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |
| **Executive Member** |  |  |  | These kind of warning labels are also used, if the equipment has to be touched under normal operation, for example for keyboards.  In such cases it should not be permitted to use such warning labels.  The warning label is not only for the installer and for the operator. It is also important for the inspection body. Therefore, the marking always needs to be visible after installation. | The first sentence shall make clear, that a warning label for example for keyboards or touch screens are not permitted.  The last sentence of the answer has to be modified. The marking must be visible after installation at any time. | Accepted in part. The intent of the label is to provide a warning to the user exactly for surfaces that may be touched such as touchscreens and keys/buttons. The user needs to be warned in those instances.  While the intent of the warning is not for the installer, to facilitate publication of this draft DS, the last paragraph is deleted. |
| CNEX-Global | - | - | G | CNEX-Global does not support this DS in the current form. During installation, the INTENT can be that the equipment is not to be touched after installation, but that does not guarantee this intent will be observed in the medium or long-time future, when people and/or handling processes can be changed.  The warning should be, and remain, visible throughout the operating life of the equipment. | **Remove** the last sentence ‘*Conversely, if there are no actions required to be taken by the operator after installation, and the required level of safety can be maintained by how the installer performs the installation, then the marking need not be visible to the operator after installation.’* | Accepted. |
| **CQM**  **CN** |  |  |  | **We endorse the answer to the question of the draft.** |  | Noted |
| **DEKRA Certification**  **NL** |  |  | **t/e** | We agree in principle  We have the following comments   1. The standard includes the limitation “where practicable” The answer in this sheet with an unlimited “shall” is a more severe requirement which is not allowed by OD035. 2. Better start with the condition followed by the requirement. 3. A paragraph starting with “for example” will be read as informative, this paragraph includes an additional requirement which may be ignored. | Replace the complete answer by:  If the operator is required to take action(s) after installation in order to maintain the required level of safety, where practicable, the marking shall be visible to the operator after installation and be in proximity to the surface of concern.  Note: If there are no actions required to be taken by the operator after installation, and the required level of safety can be maintained by how the installer performs the installation, then the marking need not be visible to the operator after installation. | Accepted in principle.  The “where practicable” aspect of the requirement is believed to apply to equipment that may be too small to have a marking on it. These types of equipment are already covered by the small and extra small component marking relaxations.  Agree to removing “For example” and just leaving the general statement. |
| **Ex-A**  **HR** |  |  |  | Ex-Agencija support ExTAG/458/CD and no further comments. |  | Noted |
| **FME**  **GB** |  |  | **General** | We agree in principle with the draft DS, but it is difficult to impose a requirement on the end users when the static marking is applied by the manufacturer who does not know what the installation will be like.  The static hazard does not solely arise from the equipment being touched, there could be other causes of a build-up and subsequent discharge of the stored energy. Remove the examples as these are only part of the problem. | The marking shall be placed in a location likely to be visible to the operator after installation, if the operator is required to take action(s) after installation in order to maintain the required level of safety. The label shall be placed in close proximity to the surface of concern.  ~~For example, if the operator is required to touch the equipment during use, then this marking is to be visible to the operator after installation.  Further, this marking is to be in proximity to the surface of concern from being touched, as the marking is critical for the operator at the part of the equipment subject to the risk.~~  ~~Conversely, if there are no actions required to be taken by the operator after installation, and the required level of safety can be maintained by how the installer performs the installation, then the marking need not be visible to the operator after installation.~~ | Accepted in principle. Agree to removing “For example” and just leaving the general statement.  Revised wording to:  “If the operator is required to take action(s) after installation in order to maintain the required level of safety, the marking should be in a location likely to be visible to the operator after installation. .  If the operator is required to interact with the equipment during use, this marking is to be in proximity to the surface of concern from being interacted with, as the marking is critical for the operator at the part of the equipment subject to the risk.”  To facilitate publication of this draft DS, the last paragraph is deleted. |
| **FMG**  **US** |  |  | **ed** | The “answer” appears to add a “requirement” that could only be verified after installation by observing the actions of the operator. This is impractical for other than unit verification.  Revise the text to make a “recommendation” using language similar to that existing in 60079-0.  Align the condition / response flow of the two options. | Revise text as shown below:  If the operator is required to take action(s) after installation in order to maintain the required level of safety, the marking ~~shall be~~ should be in a location likely to be visible to the operator after installation~~, if the operator is required to take action(s) after installation in order to maintain the required level of safety~~.  For example, if the operator is required to touch the equipment during use, then this marking ~~is to~~ should be visible to the operator after installation.  Further, this marking ~~is to~~ should be in proximity to the surface of concern from being touched, as the marking is critical for the operator at the part of the equipment subject to the risk.  Conversely, if there are no actions required to be taken by the operator after installation, and the required level of safety can be maintained by how the installer performs the installation, then the marking need not be in a location likely to be visible to the operator after installation. | Accepted in principle. : Revised to “If the operator is required to take action(s) after installation in order to maintain the required level of safety, the marking should be in a location likely to be visible to the operator after installation. .  If the operator is required to interact the equipment during use, this marking is to be in proximity to the surface of concern from being interacted with, as the marking is critical for the operator at the part of the equipment subject to the risk.  “  To facilitate publication of this draft DS, the last paragraph is deleted. |
| **Kiwa**  **NL** | **-** | **-** | **G** | **Kiwa agrees with the DS. If nescesary the warning shall be visible for the user, not only for the installalation** |  | Noted |
| **LCIE**  **FR** |  |  |  | **We support the proposed DS** |  | Noted |
| **LOM**  **ES** |  |  | General | According to Note 1 of Clause 29.2, the marking should be in a location that is likely to be visible after installation of the equipment, thus it is not a matter of how the installer performs the installation or if there are actions required to be taken by the operator after installation.  The marking should be always visible to the operator after installation. That includes the warning markings. | Since the note 1 of 29.2 advices that the marking should be in a visible place after installation regardless of installer or operator, there is no need to clarify this point with a Decision sheet. | Accepted. To facilitate publication of this draft DS, the last paragraph is deleted |
| NANIO CCVE (ExCB and ExTL  RU |  |  | General | We support ExTAG/458/CD with the following wording and comments | We propose to reword the 3d para as follows:  The marking shall be visible even if no actions are required to be taken by the operator after installation, because it has to be visible, e.g. for an inspector who has to check the correctness of the installation. | Accepted in principle. To facilitate publication of this draft DS, the last paragraph is deleted |
| **NEPSI**  **CN** |  |  | **G** | **We don’t fully support the draft decision sheet ExTAG/458/CD.**  **We understand that the marking is not set only for the equipment operator, but also sometimes for equipment inspection and maintenance personnel. Therefore, we consider the marking shall be visible to all the relevant personnel after installation.** |  | Accepted in principle. To facilitate publication of this draft DS, the last paragraph is deleted |
| **QPS**  **CA** | **-** | **-** | **General** | **Agree and support** | **none** | Noted |
| **SGS Baseefa** |  |  | **Te** | We have found it difficult to understand the intent of this draft DS.  In the case of the example provided, which we interpret to be a computer mounted through a panel, with the front (presumably the display) accessible and the rear inaccessible after installation, we see that this is likely to be component certified and the static issue addressed in the schedule of limitations.  If it is not a component, the computer can, presumably, stand alone, and the warning label should be visible to anyone that might have access to the applicable part. This would include maintenance personnel, etc., if the electrostatic problem was inside the new outer enclosure.  However, there is also the need for such restrictions to be visible to those doing inspections in accordance with IEC 60079-17 and there might be issues if the inspector performing visual and/or close inspection could not see the label that was required by the certification documentation. There is the possibility of a verdict of non-compliance. | We believe that further clarification of intent is required, before acceptance, including consideration of inspection issues.. | Accepted in Principle. The answer wording was revised to the following per your comments:  “If the operator is required to take action(s) after installation in order to maintain the required level of safety, the marking should be in a location likely to be visible to the operator after installation. .  If the operator is required to interact with the equipment during use, this marking is to be in proximity to the surface of concern from being interacted with, as the marking is critical for the operator at the part of the equipment subject to the risk.**“**  To facilitate publication of this draft DS, the last paragraph is deleted |
| **TIIS**  **JP** |  |  |  | **TIIS supports the draft DS without comments.** |  | Noted |
| TestSafe | 7.4.2 e), 29.12 g) of IEC 60079-0 |  |  | TestSafe support the proposed decision sheet. |  | Noted |