To: Marco Erdhuizen

From: Mike Slowinske, UL

Agenda items for SFC WG5

**Proposal #1: to revise IECEx 03-5**

**9.6 Surveillance**

The ExCB shall sign an agreement with the Service Facility to enable the ExCB to carry out, or arrange for another body to carry out on its behalf, periodic surveillance of the Service Facility’s Quality Management System (QMS) and quality plan(s) that shall include on-site assessments at the Service Facility’s premises. The frequency of such surveillance, inspection and assessment shall be set at a frequency of at least once every 12 months, unless the ExCB is aware of concerns that may consider the Service Facility no longer capable of complying with the IECEx Service Facility Scheme requirements and an increased frequency is deemed appropriate. The frequency may be increased to 18 months, only for Service Facilities who are also Manufacturers carrying a valid QAR, and who are only repairing their own certified products.

Justification:

Manufacturers who are repairing their own products have access to all design drawings, design experts, manufacturing process documents, etc. Therefore the risk involved in making improper repairs is minimized. Additionally, this matches the frequency for most QAR’s and therefore audit scheduling for the Manufacturer, and for the repair of a Manufacturer’s own products, are treated in the same manner.

Further changes:

If this proposal is accepted, then it is suggested that the submitter of this proposal will also propose corresponding changes to OD 313-5 and 314-5 prior to ExMC. [OD 314-5 (pg. 6/Clause 3, pg. 8/Clause 3.5.3), OD 313-5 (pg. 7 flowchart, pg. 15/Item 23, pg. 16/Section 2, pg. 18/Step 1, pg. 22/Step 13), IECEx 03-5 (pg. 11/Clause 9.6)].

These changes would be in the format of:

“……conducted at no more than 12 month intervals (or 18 months only as permitted by Clause 9.6 of IECEx 03-5) with an FAR issued at the end of each audit………..”

**Proposal #2 – Revise OD 314-5**

**8.2 Use of subcontractors**

ExCBs shall assess the method of control the Service Facility maintains over any subcontractor used to perform part of the repair, overhaul and reclamation processes, including testing and calibration activities.

The Service Facility agrees to arrange for the ExCB to evaluate relevant documentation and to arrange a visit to any subcontractor that the ExCB deems warranted. Subcontractors conducting operations that have the potential to impact on the explosion protection technique shall be subject to audit by the ExCB.

Subcontracting by Service Facilities shall be clearly defined in agreements between the ExCB and the Service Facility and the ExCB and the Subcontractor or, by delegation of the ExCB, directly between the Service Facility and the Subcontractor.

The scope of activity is an integral part of such agreements as well as evidence of competence of the Subcontractor (e.g. certificates, initial and annual audits by the ExCB). The overall responsibility remains in any case with the ExCB which certified the Service Facility. ~~Agreements mentioned above shall be registered by the IECEx secretariat.~~

Justification:

Per discussions with IECEx Secretariat, this register is not in active use.