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

**Title: Compilation of Comments on ExTAG/598/CD - Draft ExTAG Decision Sheet – Equipment completion marking.**

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

**INTRODUCTION**

This document contains the Compilation of Comments and Observations from the Originator Physikalisch-Technische Bundesanstalt, PTB, DE, on ExTAG/598/CD - Draft ExTAG Decision Sheet – Equipment completion marking*.*

As a result of comments received, and considered, Decision Sheet ExTAG DS 2020/004 has now been published.

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

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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)** |
| --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |
| **CNEX-Global BV**  **NL** | **-** | **-** | **G** | **CNEX-Global BV supports this draft DS** | **None** | **Noted** |
| **DEKRA / BVS**  **DE** |  |  | **General** | We are in favour with the proposed DS | **None** | **Noted** |
| **DEKRA KEMA NL** |  |  | **General** | **We agree that the standard is clear and shows no permission for certification as equipment with X marking. From that point of view the ExTAG DS has no added value.**  **On the other hand we see more items intended to be mounted in the wall of enclosures certified as equipment, which only comply with all requirements of the types of protection when installed in the enclosure.**  **For example breathing devices or control elements as signal lights and switches which have a similar joint with the enclosure as an entry device.**  **We prefer that in case A: the joints are well defined and B: the installation instructions are clear and C: the joint is included in the tests, it can be certified as equipment.**  **We think this cannot be arranged by an ExTAG DS and this topic shall be addressed by the maintenance team, WG22, for the next edition of IEC 60079-0.** | **withdraw the sheet, and forward the topic to WG22 as input for a discussion about the next edition of IEC 60079-0.** | **Not accepted - The answer as written is the position of TC 31. The additional examples are not covered by the DS and shall be addressed by TC 31.** |
| **DNV GL Presafe AS**  **NO** |  |  |  | **We agree with the proposal** |  | **Noted** |
| **ExTC AU** |  |  |  | **We support the proposed ExTAG Decision Sheet with no comments.** |  | **Noted** |
| **Eurofins CML**  **GB** |  |  |  | **Eurofins E&E CML doesn’t have any problems to raise with this ExTAG decision sheet.** | **None** | **Noted** |
| **FIDI**  **HR** | **-** | **-** | **G** | **We support the Decision Sheet: ExTAG/598/CD and no further comments** | **-** | **Noted** |
| **FME**  **GB** |  |  | **Ge** | **We agree with this draft DS as written.** | **None** | **Noted** |
| **NANIO CCVE (RU)** |  |  | **General** | **We accept this Decision Sheet without comments.** |  | **Noted** |
| **NEPSI CN** |  |  | **G** | **We support the draft decision sheet ExTAG/598/CD.** |  | **Noted** |
| **NCC**  **BR** | **-** | **-** | **-** | **We agree.** | **-** | **Noted** |
| **QPS**  **CA** | **-** | **-** | **General** | **While we agree in principal about a partial enclosure being considered a component it is not clear how a device can be considered both equipment and a component in the case where a device is additional evaluated for a Group II protection method. i.e do we issue two certificates?** | **Propose additional clarification on what do for a device the is certified as equipment for Group II and as a component Group III.**  **Example, an HMI can be Ex ec and Ex tc.**  **Would we issue two certificates?** | **Accepted in principle**  **Due to the fact that the certificate number includes the ‘U’ resp. ‘X’, two different certificates have to be issued for Ex tc and Ex ec.** |
| **SIMTARS**  **AU** |  |  |  | **Simtars has no comments and agrees with the decision sheet.** | **None** | **Noted** |
| **SIQ SI** |  |  |  | **We fully support this DS.** | **None** | **Noted** |
| **TC31** |  |  | **ge** | **Unlike IEC 60079-7, IEC 60079-31 does not currently provide a permission for the application described.** | **Change the answer part of the draft to:**  **“Unlike IEC 60079-7, IEC 60079-31 does not currently provide a permission for the application described. Without a change to the standard, the only possibility is:**  **Products in Type of Protection Ex t, that only partially meet the enclosure requirements of IEC 60079-31, can only be treated as an Ex Component with a Schedule of Limitations.**  **The Schedule of Limitations on the certificate needs to be clear and usable by the designer.”** | **Accepted** |
| TC31 |  |  | ge | JWG50 should propose that IEC TC31/WG28 consider the possibility of future revisions to IEC 60079-31 to consider Ex Equipment intended to be mounted, by the end-user, in the wall of an Ex t enclosure; such as Switch actuators, signal lights, instruments and the like.  If the joints are well defined, the installation instructions are clear, and the joint is included in the tests of enclosure, this should be technically possible. A set of Specific Conditions of Use, similar to those of IEC 60079-7, would need to be developed.  This should not be applicable to “ta”. |  | **Accepted** |
| **TIIS**  **JP** |  |  | **technical** | We do not agree with the draft DS.  We think it is acceptable that such equipment is certified as Ex equipment with appropriate Specific conditions of use. A certificate as an Ex component would be a possible option if a manufacturer needed.  Note. Above comments are based on the case that all requirements other than ingress protection (IP) are successfully passed. e.g. temperature or joints. | Modify Answer as follows.  Both a) and b) are acceptable. In the case of a), certificate shall be provided Specific conditions of use to maintain ingress protection with specific parts of equipment which the condition will be applied to. Manufacturer should provide further guidance on installation to achieve a required IP in instruction manuals. | **Not accepted - The answer as written is the position of TC 31.** |
| **UL-**  **USA** |  |  | **General** | Ex Equipment certification of “open type” devices under IEC 60079-15 and IEC 60079-7 also require associated IP testing (e.g. IP 54), and as such, should follow a consistent approach with 60079-31 unless the standards committee specifically prohibits it.  Given that this decision sheet would create a deviation from current practice and a difference of approach between these standards, we feel this is more appropriate for the TC31 MT rather than a ExTAG decision sheet. | **Refer to MT60079-31** | **Not accepted - The answer as written is the position of TC 31.** |
| **ULBR**  **BR** |  |  | **General** | Ex Equipment certification of “open type” devices under IEC 60079-15 and IEC 60079-7 also require associated IP testing (e.g. IP 54), and as such, should follow a consistent approach with 60079-31 unless the standards committee specifically prohibits it.  Given that this decision sheet would create a deviation from current practice and a difference of approach between these standards, we feel this is more appropriate for the TC31 MT rather than a ExTAG decision sheet. | **Refer to MT60079-31** | **Not accepted - The answer as written is the position of TC 31.** |
| **ULD**  **DK** |  |  | **General** | Ex Equipment certification of “open type” devices under IEC 60079-15 and IEC 60079-7 also require associated IP testing (e.g. IP 54), and as such, should follow a consistent approach with 60079-31 unless the standards committee specifically prohibits it.  Given that this decision sheet would create a deviation from current practice and a difference of approach between these standards, we feel this is more appropriate for the TC31 MT rather than a ExTAG decision sheet. | **Refer this matter to MT60079-31** | **Not accepted - The answer as written is the position of TC 31.** |