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

Circulated to: ExTAG Members

Title: Revision of IECEx OD 207, Edition 2.0 (Proposed edition 3.0)

Introduction

The following proposal (shown as Track Changes) for a revision of IECEx OD 207, Edition 3.0 prepared by ExTAG WG12 is now submitted for review by ExTAG during their 2026 Beijing Meeting.

ExTAG WG 12 is proposing that the OD be expanded to include retention of records requirements for all IECEx schemes. Members will be asked to consider and support this approach and the proposed document

This draft is issued as a redline version to identify changes from the current edition.

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IECEX OPERATIONAL DOCUMENT

IEC System for Certification to Standards Relating to Equipment for Use in
Explosive Atmospheres (IECEX System)

IECEX System ~~Certified Equipment Scheme~~ –
R ~~Guidance on~~ retention of records



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IECEX OPERATIONAL DOCUMENT

IEC System for Certification to Standards Relating to Equipment for Use in
Explosive Atmospheres (IECEX System)

~~IECEX Certified Equipment Scheme~~System –
~~Guidance on r~~Retention of records

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INTERNATIONAL ELECTROTECHNICAL COMMISSION

IECEX Operational Document OD 207 –

**IECEX ~~Certified Equipment Scheme~~ System –
Guidance on ~~r~~ Retention of records**

FOREWORD

This document is supplementary to the IECEx rules, other IECEx Operational Documents and procedures operated by IECEx ~~Certification Bodies (ExCBs)~~, approved by the IECEx Management Committee to issue IECEx ~~Certificates~~ documents of cConformity (CoCs) ~~for equipment.~~

The purpose of IECEx Operational Documents (ODs) is to ensure that each ~~ExCB~~ IECEX Body, accepted by the ExMC for the purposes of issuing IECEx ~~CoCs~~ document of conformity, does so in a consistent manner.

This Operational Document IECEx OD 207 provides requirements on the matters relating to the retention of records.

This document was initially prepared by ExTAG Working Group 12 with final consideration during the 2016 Umhlanga IECEx series of meetings. Document ExMC/418A/CD was submitted for consideration at the 2016 ExTAG meeting with an ExTAG recommendation made to ExMC to proceed to publish.

Document History

Date	Summary
2017-09	Original issue (Edition 1.0)
2020	Edition 2.0 published to clarify requirements
<u>2026</u>	<u>Revised and extended to all schemes</u>

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INTRODUCTION

There are at least two reasons for retention of records. Those are:

- Proof of compliance of ~~equipment~~ object of conformity with applicable requirements (ensuring evidence of safety) and
- Source for investigation, if needed, ~~e.g for example~~ if an incident with Ex E equipment occurs.

In general, there is a lack of understanding of the differences between electronic back-up and archiving. This is particularly noticeable during the assessment of IECEx Bodies ~~ExGBs and ExTLs~~.

Typically, back-up is about retaining your current data and is application specific. The idea is to be able to recover your data if the computer systems fail. It is not unusual for records to be overwritten after a period of time. For tape records (where such media is utilized) this can be as short a time as one week. For other media it may be longer but subject to deletion of records inadvertently. For example, if records are accidentally deleted in the workplace computer or server, they may then be deleted in the back-up records (~~e.g for example~~ if records are synchronized).

Archiving normally stores the data in a non-application specific form so it can still be retrieved many years later. Some indications of a proper electronic archival system are:

- a) Records that need to be retained are protected and cannot be deleted in the current or archival version of the data storage for the specified period of time for retention.
- b) The type of media used must be selected and managed in a way that ensures that the data is not corrupted for the specified period of time for retention.
- c) The media must not be capable of being affected adversely by foreseeable problems in the manner they are stored, ~~e.g for example~~ magnetic fields, fire, water (from fire protection system).
- d) The nature of storage of the medium must not be so application specific that it might not be possible to read some years hence while still within the specified period of time for retention.

It was agreed by the ExMC WG4 meeting in Paris (in 2008) that the following approach be taken by IECEx System:

- Assessors should seek evidence of oldest records both in electronic and hard copy to test the retrieval and existence of records.
- Assessors should also find out the method of secure disposal of hard copy records when going electronic.

IECEX System - Guidance on rRetention of records

1 Scope

This IECEX Operational Document contains the requirements for retention of records by IECEX Bodies~~ExCBs and ExTLs~~ in the IECEX System~~Certified Equipment Scheme~~.

~~NOTE 1 Possible revision of this OD for application in other IECEX Schemes is under consideration.~~

NOTE ~~1~~² The ExTL referred to in this document includes additional testing facility (ATF).

NOTE 2 RTPPs are not subject to auditing by the IECEX and are therefore not obliged to comply with this OD.

2 Normative references

ISO/IEC 17024, Conformity assessment — General requirements for bodies operating certification of persons

ISO/IEC 17025, *General requirements for the competence of testing and calibration laboratories*

ISO/IEC 17043, Conformity assessment — General requirements for the competence of proficiency testing providers

ISO/IEC 17065, *Conformity assessment - Requirements for bodies certifying products, processes and services*

3 Definitions

3.1 records

information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business

3.2 records management

field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposal of records, including processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records

3.3 records system

information system which captures, manages and provides access to records through time

3.4 IECEX Bodies

~~include~~ ExCBs and ExTLs.

~~NOTE RTPPs are not subject to auditing by the IECEX and are therefore not obliged to comply with this OD.~~

4 Policy, procedures and responsibilities

4.1 General

As required by ISO/IEC 17065, ~~and~~ ISO/IEC 17043, ISO/IEC 17025 and ISO/IEC 17024 the ~~ExCBs and ExTLs~~ IECEX Bodies shall establish, document and maintain policies, procedures

and practices for records management to ensure that their needs for evidence, accountability and information about operation of ~~its~~ the Schemes are met.

NOTE Throughout this document all references to Scheme refer to the all schemes in the IECEx System Certified Equipment Scheme.

4.2 Policy

~~ExCBs and ExTLs~~ IECEX Bodies shall define and document a management policy for the retention of records. The objective is creation and management of authentic and useable records, capable of supporting functions and activities related to operation of Scheme related activities for as long as they are required by the Scheme (including ISO/IEC 17065, ~~and ISO/IEC 17043~~, ISO/IEC 17025 ~~and ISO/IEC 17024~~, as applicable). ~~ExCBs and ExTLs~~ IECEX Bodies shall ensure that the policy is communicated and implemented at all levels in the organization.

NOTE Responsibility for compliance should be assigned. Policies should be regularly reviewed to ensure that they reflect current business needs.

4.3 Procedures

Individual ~~ExCBs' and ExTLs~~ IECEX Bodies' procedures, processes and practices shall comply with the requirements of this and other applicable documents (such as ISO/IEC 17065, ISO/IEC 17043, ISO/IEC 17025, ISO/IEC 17024).

4.4 Responsibilities

Records management responsibilities and authorities shall be defined and assigned throughout the ~~ExCBs and ExTLs~~ IECEX Bodies so that where a specific need to create and capture records is identified it is clear who is responsible for taking the necessary action.

NOTE These responsibilities should be assigned to appropriate employees of the organization, including records managers, allied information professionals, executives, business unit managers, systems administrators and/or others who create records as part of their work, and should be reflected in job descriptions and/or similar statements. Specific leadership responsibility and accountability for records management should be assigned to a person with appropriate authority within the ~~ExCB's or ExTLs~~ IECEX Bodies's organization.

5 Records management

5.1 General

~~ExCBs and ExTLs~~ IECEX Bodies shall implement a comprehensive records management programme, which includes:

- complying with legal and regulatory requirements, applicable standards and organizational policy;
- ensuring that records are maintained in a safe and secure environment; and
- ensuring that records are retained ~~only~~ for as long as needed or required.

Where a “cloud” system is used, ~~ExCBs and ExTLs~~ IECEX Bodies shall ensure that the requirements of this OD are met by that system. The “cloud” system shall be equipped with an off-site redundant disaster recovery mechanism to ensure business continuity.

5.2 Types of records and management responsibility

This section deals with all records that need to shall be retained. A full list of records that shall be retained is provided in Annex A~~Annex A. -where relevant records for the individual IECEx Schemes are listed-~~

Some records are common to all IECEx schemes and others apply only to specific Scheme as appropriate. Annex A~~Annex A~~ clarifies which record is relevant for any of the Schemes.

The types of records (~~related to this Scheme~~) covered by this OD that shall be kept ~~accordingly~~ are ~~listed~~ as follows:

- IECEx ~~CoC~~certificates and Annexes, if any;
- issued ExTRs and associated test records, especially original data;
- issued FARs and associated records, especially original data;
- issued PCARs, especially original data;
- issued IECEx Conformity Mark Licences;
- records supporting the issue of IECEx Conformity Mark Licences;
- manufacturer's drawings and documentation;
- QARs, including auditing information supporting the QARs;
- calibration records, including historical calibration records;
- records supporting the upgrade, suspension, cancellation and reinstatement of issued certificates, where applicable
- historical competency records; and
- historical records of procedures/work instructions.

~~The detailed management responsibility for specific types of records is indicated in Annex A.~~

6 Design and implementation of records systems

6.1 Records systems characteristics

6.1.1 Reliability

Records systems shall:

- protect the records from unauthorized alteration or disposal; and
- provide ready access to all relevant records and related metadata.

6.1.2 Systematic

Records shall be created, maintained and managed systematically. Records systems shall include documented policies, assigned responsibilities and formal methodologies.

6.2 Basic requirements for records systems

6.2.1 Physical storage medium and protection

This OD applies to all records in any form or media including, without limitation, printed records, emails, electronic (digital) records of all types including “cloud” storage, CD-ROMs, magnetic tapes, floppy discs, audio tapes, etc.

6.2.2 Retention and disposal

Additional information regarding retention and disposal, including minimum retention times, is provided in Annex A.

6.2.3 Conversion, migration and discontinuing records systems

For the entire period of their retention all records shall remain authentic and useable. This includes any kind of system change, format conversion, hardware or software change.

After decommissioning or discontinued use of a records system there shall be procedures preventing additional records being added to the system. The records shall continue to be accessible. They can only be removed from the system in accordance with the current retention and disposal requirements and guidelines of the IECEX Bodies.

7 Records management processes and controls

7.1 Storage and handling

Usability, authenticity and preservation of records for as long as they are needed (as described in Annex A) shall be ensured. This applies for all types of media mentioned in Subclause 6.2.1.

Storage conditions and handling processes shall take into account the specific physical and chemical properties of the media used.

Whenever any kind of system change occurs, systems for electronics records shall be designed so that records remain accessible, authentic and useable for the entire period of their retention.

7.2 Implementing disposal

Records shall be removed from operational systems on a systematic and routine basis in accordance with normal business activities and according to this OD. Before initiating the disposal action, it shall be assured that the record is no longer required, that no work is outstanding and that no investigation is current or pending which would involve relying on the records.

While disposal action may take different shapes it is of high importance to pay close attention to the confidentiality aspects in particular when the records are transferred to another organization (e.g. refer to Clause 9).

7.3 Documenting records management processes

In the IECEX Bodies's quality documentation describing records management processes and records systems, technical, organizational and legal requirements shall be addressed. Authority for records management processes shall be clearly defined. Records associated with the outcome of these processes shall be kept in accordance with the requirements of the responsible IECEX Body.

8 Monitoring and auditing

IECEX Bodies shall undertake compliance monitoring as a part of the internal auditing system to ensure that the records systems procedures and processes were implemented as required by the organizational requirements and that the records are accessible, authentic and usable. Records from such monitoring shall be maintained.

9 Requirements when an IECEX Body exits the Scheme

If an IECEX Body exits the Scheme (e.g. voluntary exit, an organization is closed, acquired or merged with other organization) the following actions shall be undertaken:

- In the event of acquisition or merging the new IECEX Body shall ensure that it has acquired all the records from the former body and put in place a system for retention of those records compliant with this OD.
- In the event of the closure of an IECEX Body the manufacturer/applicant shall be given the option to decide to which existing IECEx accepted IECEX Body they require to transfer the records.

NOTE The IECEX Secretariat is responsible to monitor the process, and to ensure and report back to the ExMC once they have confirmed that the process of transferring the records is completed.

Annex A (normative)

List of affected records

Type of record	Point of reference for retention of record times	Minimum retention time	Responsibility for records	IECEX Scheme
IECEX CoCs and Annexes, if any Summaries of ExTRs and QARs	Not applicable.	These records are kept by the IECEX System indefinitely. There is no requirement for ExCBs to meet the requirements of this OD for CoCs and their associated supporting summary documents. NOTE In practice it would be expected that the ExCBs would still have copies of the CoCs in their records together with the associated ExTRs and QARs. This OD is not assigning minimum retention times for copies of these CoCs.	IECEX Secretariat	IECEX 02
IECEX CoC Service Facility Certificates Summaries of FARs	Not applicable	As above	IECEX Secretariat	IECEX 03
IECEX Conformity Mark Licenses	Not applicable	As above	IECEX Secretariat	IECEX 04
IECEX CoPCs and EFOCs Summaries of PCARs and Facility Orientation Certificates	Not applicable	As above	IECEX Secretariat	IECEX 05
- Issued ExTRs and associated test records, especially original data - Manufacturer's drawings and documentation that are referred to in the CoCs and/or ExTRs	Date of cancellation of associated CoC or if there is no CoC, date of issue of ExTR	10 years	ExCB and ExTL, as appropriate	IECEX 02
Issued FARs and associated records (for example e-g, facility documentation), especially original data	Date of cancellation of associated CoC Service Facility Certificate	10 years	ExCB	IECEX 03
Issued PCARs and associated records (e-g for example, personal data),	Date of cancellation of associated CoPC	10 years	ExCB	IECEX 05

<u>especially original data</u>				
Issued QARs and associated auditing information supporting the QARs	Date of expiry of QAR	10 years	ExCB	<u>IECEX 02</u>
<u>Records supporting the issue of IECEX Conformity Mark Licences</u>	<u>Date of cancellation of associated Conformity Mark License</u>	<u>10 years</u>	<u>ExCB</u>	<u>IECEX 04</u>
Calibration records, including historical calibration records	Date of last calibration	10 years	ExTL	<u>IECEX 02</u>
<u>Records supporting the upgrade, suspension, cancellation and reinstatement of issued certificates, where applicable</u>	<u>Date of cancellation of associated certificates</u>	<u>10 years</u>	<u>ExCB</u>	<u>IECEX 02.</u> <u>IECEX 03.</u> <u>IECEX 04</u> <u>IECEX 05</u>
Historical competency records	Date when their employment has ceased	10 years	ExCB and ExTL	<u>IECEX 02.</u> <u>IECEX 03.</u> <u>IECEX 04</u> <u>IECEX 05</u>
Historical records of procedures/work instructions	Issue date of the document	10 years	ExCB and ExTL	<u>IECEX 02.</u> <u>IECEX 03.</u> <u>IECEX 04</u> <u>IECEX 05</u>