



**ExTAG/777/DV
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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: Hungarian Proposal for amendment to IECEX 02

Introduction

The following proposal for an amendment to IECEX 02 to be submitted to ExMC for ExMC WG 01 is now submitted for review by ExTAG during their 2026 Beijing Meeting. ExTAG are to consider if this proposal meets the intent of the IECEX Conformity System.

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Completion of Proposal to Amend Clause 3.25 (Definition of Additional Testing Facility – ATF) in IECEx 02 Ed. 8.1**1. Scope of the Proposal**

This proposal requests a limited amendment to Clause 3.25 (Definitions) of IECEx 02 in order to clarify that an Additional Testing Facility (ATF) may operate under written agreement with more than one Ex Testing Laboratory (ExTL). The proposal is intentionally confined to the definition and does not introduce or modify any requirements. All operational, quality, assessment, and responsibility provisions remain governed by the existing clauses of IECEx 02, in particular Section 11.3.

2. Proposed Amendment**2.1 Current text**

(IECEx 02 Ed. 8.1, Clause 3.25)

“A testing laboratory located remotely from an accepted ExTL which is accepted according to these rules, and which is under the complete control of, or belongs to, or works under a written agreement with one Ex testing laboratory (ExTL).”

2.2 Proposed revised text

“Additional Testing Facility (ATF)

A testing laboratory located remotely from one or more accepted Ex Testing Laboratories (ExTLs), which is accepted according to these rules, and which is under the complete control of, or belongs to, or works under written agreement(s) with such ExTL(s).”

3. Rationale for the Amendment

The current wording of Clause 3.25 implicitly restricts an ATF to a single ExTL through the use of the term “one ExTL”. This restriction is not explicitly required elsewhere in IECEx 02, nor is it fundamental to the principles of technical control, traceability, or responsibility that underpin the IECEx System. The proposed amendment removes the implicit single-ExTL limitation, allows greater flexibility in the utilisation of qualified testing facilities, and does so without altering the existing IECEx governance model.

4. Relationship to Existing Requirements

This proposal does not modify ExTL responsibility for test results and ExTRs, assessment or surveillance activities, quality management system requirements, or acceptance criteria for ATFs.

All such matters remain subject to Section 11.3 and other applicable provisions of IECEx 02. The amendment is strictly definitional and enabling in nature.

Regarding the feedback on Section 11.3, we have reviewed the existing text. Section 11.3.1 states that an ATF is "under the responsibility of the ExTL". By changing the definition to allow multiple ExTLs, the responsibility defined in 11.3.1 naturally extends to each ExTL for the specific activities conducted under its respective agreement. No direct conflict exists as the operational requirements of 11.3 remain fully applicable to any ExTL-ATF relationship.

5. Clarifications in Response to WG Feedback

In response to comments received during the ExMC WG1 review process, the following elements from the original submission have intentionally been excluded from this revised proposal:

- No requirements are introduced into the definition.
- No reference is made to full implementation of ExTL quality management systems at the ATF.
- No numerical limitation on the number of ExTL relationships is proposed.
- No wording combining "shall" with non-normative qualifiers (e.g. "normally") is used.

This ensures full consistency with IEC drafting principles and avoids conflict with existing clauses.

6. Future Considerations (Non-normative)

ExVA recognises that practical implementation aspects related to ATFs operating under multiple ExTL agreements may warrant further discussion within ExMC WG1, particularly in relation to Section 11.3.

While we maintain that the current 11.3 is functionally compatible with a multi-ExTL definition, we welcome a more detailed review of the operational procedures to ensure seamless surveillance and assessment processes.

This proposal does not pre-empt such discussions and is submitted solely to clarify the definition in Clause 3.25. Any future proposal addressing operational or assessment requirements would be developed separately and in alignment with WG1 guidance.

7. Conclusion

This amendment provides a clear, minimal, and non-disruptive clarification to IECEx 02, while preserving the integrity, accountability, and technical confidence of the IECEx System.

ExVA Testing and Certification Ltd. respectfully requests that ExMC consider this proposal as input to a future revision of IECEx 02.