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 | **ExMC/1261A/DV****Replaces ExMC/1261/CD****July 2018**  |

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

**To: Members of the IECEx ExMC**

**Title: Revised Draft Requirements for Additional Testing Facilities – for consideration by ExMC during the 2018 Cannes meeting**

**INTRODUCTION**

Document ExMC/1261/CD was presented during the 2017 Washington meeting of ExMC as an initial proposal for requirements concerning use of Additional Testing Facilities (ATF) associated with an ExTL with advice that ExMC WG1 Task Force still wished to conduct further work on these requirements.

Following further work, ExMC WG1 during its June 2018 Weimar meeting considered additional requirements and now proposes this updated version, which also takes into account matters raised during the Washington 2017 ExMC meeting, for approval by the ExMC during its Cannes 2018 meeting.

This proposal also includes suggested changes to the IECEx 02 rules and related Operational Documents as follows:

* ExMC/1389/DV: Proposed changes to IECEx 02 Rules
* ExMC/1390/DV: Proposed changes to Operational Document OD 010-2
* ExMC/1391/CD: Proposed application form for IECEx Additional Testing Facilities

**IECEx Secretariat**

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| **Address:****Level 33, Australia Square****264 George Street****Sydney NSW 2000****Australia** | **Contact Details:****Tel: +61 2 4628 4690****Fax: +61 2 4627 5285****e-mail:info@iecex.com**[**http://www.iecex.com**](http://www.iecex.com) |

**Additional Testing Facilities**

Background

Following on the meeting of ExMC, the AdHoc group were asked to update the proposal ExMC\_1261\_CD\_Additional Testing Locations to take account of issues raised by ExMC.

Definition and description an Additional Testing Facility (ATF)

A testing laboratory located remotely from an accepted ExTL which is accepted according to the IECEx Rules and which is under the complete control of, or belongs to or works under a written agreement with a single Ex Testing Laboratory (ExTL). An ATF can only have a one-to-one relationship with a single ExTL. A manufacturer’s test facility cannot be an ATF.

An ATF is in effect a part-ExTL because it lacks the complete equipment, personnel, experience and/or expertise to be a full ExTL. An ATF can thus be a facility with very limited scope (e.g. thermal conditioning) or one with nearly full scope that has potential to become an ExTL in its own right. The principle of an ATF is to support the supervising ExTL with test results under a transparent process that is fully recognised by the IECEx Rules.

How an ATF differs from an ExTL

* An ExTL has to meet rigorous criteria for expertise across the full range of testing and assessment against a given standard. An ATF by comparison is defined by the tests that it can conduct.
* An ATF (i.e. ATF “Q” in the diagram below) may work only for a single, supervising ExTL (i.e. ExTL “Y” in the diagram). This ensures proper control of laboratories which do not have the level of expertise or equipment of a full ExTL.
* An ATF produces test and assessment results but does not issue the ExTR. The supervising ExTL always issues the ExTR.
* The frequency of the IECEx re-assessment of the ATF is determined as the same as for the supervising ExTL.
* An ATF may not subcontract any of its work. An ATF is in effect a special subcontractor for the ExTL and is not considered competent to further subcontract the work.
* Another ExTL (e.g. ExTL “X” in the diagram) may only use an ATF linked to another ExTL via subcontract to that supervising ExTL (ExTL “Y” in the diagram). Direct use is not permitted.

ExCB

ExTL “X” “AB

ExTL “Y”

ATF “Q”

Obligations of the supervising ExTL (ExTL “Y” in the diagram)

* This ExTL is responsible for supervising the work of the ATF.
* The ExTL approves and issues the ExTR containing any test results obtained at the ATF.
* The ExTL must apply the rules of the ExTL’s own quality system to the ATF and conduct an on-site, internal audit of the ATF at least annually.
* Contribution to Annual fees being same annual fee that applies to ExTLs for each ATF.

Discussion points at the meeting

The following items were discussed at the meeting of 19 June 2018 of the ExMC WG1 TF:

1. Agreement on the term ATF – This was decided in September 2016 ExMC meeting and is included in the text of the attached IECEx 02 annex to this report.
2. Review definition see above changes – The definition was updated in the attached IECEx 02 annex to this report.
3. Review the list of requirements (re some requirements were included in the previous definition) – The old term (Additional testing Location or ATL) has been replaced by ATF.
4. Seek clarity in an ATF working with more than 1 ExTL – if an ATF is working with more than 1 ExTL include requirements to enable this. – The intent was for this to be a tightly controlled, one-to-one relationship, and thus an ATF may only link with one ExTL, although an ExTL may be linked to more than one ATF. Clarification to IECEx 02 11.3.1.
5. Prepare an IECEx Application Form – Form ExMC\_49A\_Q has been created to address ATF. It is attached as an annex to this report.
6. Review whether or not a manufacturer’s test facility can or cannot be an ATF. – The intent is for this to be for third part test facilities only, and hence manufacturers are not included.
7. Ensure that there is clear mention of the contract between the ATF and ExTL – The proposed text for IECEx 02 section 11.3.1 has been modified to reflect that a written agreement must be in place.
8. The need to include a reference to OD 202 for PTP – Text added to IECEx 02 section 11.3.1.
9. Include a requirement that ensures clarity of the scope of ATFs – Addition to IECEx 02 11.3.8 (Extension of scope) to limit scope to that of its supervising ExTL.

Additional action points

* The AdHoc group discussed how the testing/assessment scope of ATFs is recorded and made available to receiving ExCB since the ATF will not always be working to full standards – it was decided that the scope of the ATF will be recorded in OD 001, adjacent to the supervising ExTL.
* The “IECEx Test Report Cover” should contain a statement informing (to the level of detail needed) about the use of ATF assessment and/or testing so that testing outside of “IECEx approved scope” doesn’t occur. – OD 010-2 has been updated to specify how the ATF location and testing performed is recorded on the IECEx Test Report Cover. A draft OD 010-2 is attached as an annex to this report.

Additional Documents:

1. ExMC/1389/DV - Proposed revisions to IECEx 02
2. ExMC/1390/DV - Proposed update to IECEx OD 010-2
3. ExMC/1391/Q - Proposed ATF application form (based on ExMC\_49A\_Q)