



ExMC/1284/CD
August 2017

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

**Title: US Proposals concerning the Draft IECEx Supplement to the IEC
Harmonised Basic Rules Edition 2.0**

To: Members of the IECEx Management Committee, ExMC

Introduction

This document contains proposals from the US concerning the draft IECEx Supplement to the IEC Harmonised Basic Rules (ExMC/988C/DV), for consideration during the 2017 ExMC Washington meeting.

IECEx Secretary

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August 15, 2017

VIA E-MAIL TRANSMISSION

Mr. Chris Agius
IECEX Secretariat
c/o IEC Central Office
3, rue de Varembe
P.O. BOX 131
CH-1211 Geneva 20, Switzerland

Subject: USNC/IECEX Comment Regarding the Agenda for the 2017 ExMC Meeting, Item 5.3,
IEC Conformity Assessment System's Harmonised Basic Rules (ExMC/988C/DV)

Dear Mr. Agius:

The USNC/IECEX provides the following comments to Agenda Item 5.3.

Clause 7.102

The USNC/IECEX believes that the document distribution timeline proposed in Clause 7.5 of IEC CA 01 Ed 2.0, *IEC Conformity Assessment Systems – Basic Rules*, is needed and therefore believes that Clause 7.102 of ExMC/988C/DV should be deleted as the text contained in 7.4 and 7.5 of IEC CA 01 provides a more effective approach.

The distribution timeline provides the structure for the IECEX Member Bodies to adequately plan for active participation in the IECEX Management Committee (ExMC) Meeting. Having this specific structure provides the membership specific dates by which proposals must be submitted, provides the members adequate time to consider those proposals and provides time for all members to fully consider the proposal and any comments received.

Recognizing that the ExMC is composed of many non-native English speaking members, the timeline provides the ability for members to translate documents, if needed, so that all members participate fully in the meetings of the ExMC. Many non-native English speakers have commented that written documents are much easier to consider and that following oral discussions, especially considering different accents, is sometimes difficult. Documents that are submitted outside of these timelines disadvantage those Member Bodies whose comfort level with English is not as high as others.

One additional benefit of the structured timeline is the ability for Members to schedule preparation meetings since the dates when documents will be available are known in advance.

Clause 8

The USNC/IECEEx believes there would be a benefit to the System in having the terms of the Officers of the System staggered such that only one Officer is elected at any given time. Currently, we have the Vice-Chair and Treasurer elected in the same year. In order to achieve this, we suggest a one-time change to the term for the current election for Vice-Chair to a four year term and suggest that the System petition the CAB for a four year term for this new Vice-Chair election.

In addition, we suggest that the IECEEx supplement (ExMC/988C/DV) incorporate the following addition:

8.9.101 The term of office for elected ExMC positions, Chair, Vice-Chair and Treasurer shall not end in the same year with the aim that there is only one appointment in any given year. The term of office for elected ExSFC positions, Chair and Deputy Chair, shall not end in the same year with the aim that there is only one appointment in any given year. The term of office for elected ExPCC positions, Chair and Deputy Chair, shall not end in the same year with the aim that there is only one appointment in any given year.

Clause 12.2

The USNC/IECEEx notes that there is a previous document and decision that impacts Clause 12.2 of the IEC CA 01 and ExMC/988C/DV, *Draft Supplement to the IEC Harmonised Basic Rules, IEC CA 01*. The current proposal for 12.2 indicates the following:

12 Voting

The requirements of Clause 12 of IEC CA 01 applies.

The USNC/IECEEx would like to note the following IECEEx Decision related to voting by correspondence:

Decision 2015/34

The Meeting supported the US proposal as detailed in ExMC/1058/CD and also accepted the suggestion that the same process be adopted for ExTAG Decision Sheets. This may also be incorporated into the IECEEx Good Working Practice Guide document.

The USNC/IECEEx notes that additional text still needs to be added to the IECEEx Supplement (ExMC/988C/DV) to address the circulation of negative votes and comments from the membership.

From Document ExMC/1058/CD:

Re-circulation of any member comments that were submitted with negative votes, with Secretariat responses included, for re-consideration of their votes by other members prior to final approval of the document revisions.

Therefore, the USNC/IECEEx suggests the addition of the following clause to ExMC/988C/DV:

12 Voting


The requirements of Clause 12 of IEC CA 01 applies, with the addition of the following text:

Any Member Body comments that were submitted with negative votes shall be re-circulated, with Secretariat responses included, for re-consideration of their votes by other Member Bodies prior to final approval of the document revisions.

The USNC/IECEEx requests that the Secretariat also add the other five bullet points from ExMC/1058/CD to IECEEx OD-031, *Guide for Good Working Practices for the Management of the IECEEx System's Working Groups*, in accordance with Decision 2015/34.

Thank you for your attention to this matter. Please contact me if you have any questions.

Sincerely,



Secretary, USNC/IECEEx