



ExMC(2020 Remote/FR)07
September 2020

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

To: Members of the IECEx Management Committee, ExMC

**Title: FR Comments regarding IECEx Technical Capability Document – ExMC Agenda
item 8.5**

Introduction

This document contains Comments from FR regarding IECEx TCD.

This document is issued as a Tabled Document, (previously referred to as Green Paper) and tabled for the IECEx Management Committee, ExMC October 2020 meeting under agenda item 8.5 re Agenda ExMC/1614A/DA.

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Fontenay-aux-Roses, 2020/09/10

To IECEX Secretariat

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

Subject : French comment relative to TCD regarding the Spark Test Apparatus (item 8.5)

Dear Mr. Agius,

Considering that the Spark Test Apparatus is a very specific test equipment and the relative low number of tests performed during IS assessment, the French committee proposes to adopt the same approach as for optical power and optical irradiance tests which is approved in the current TCD: "the laboratory should be able to perform the test (...) or have a subcontract arrangement with a body that could do these tests. In this case the subcontracting body will require an assessment by IECEX."

In addition, a limitation of number of tests sub-contracted each year could be added. (eg. "if the ExTL needs to subcontract more than x times in any one year, the ExTL is required to have the equipment in its possession").

The benefits would be to:

- increase the number of tests performed by the ExTLs subcontracted
- reach the minimum level of activity to ensure a better management of the apparatus (maintenance, calibration)
- reach the minimum level of activity to ensure the maintenance and development of competencies for ExTL personnel
- ensure a better homogeneity in test results for IS assessment based on Spark Ignition Test as competencies of laboratories performing tests would be increased

Best Regards,

French National Committee (CCFIECEX)
on behalf of Marie-Elisabeth d'Ornano

Julien Gauthier
