



ExMC/1755/CD  
August 2021

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

**Circulated to: IECEX Management Committee (ExMC)**

**Title: US Comments relating to 2021 ExMC Meeting Agenda Item 8.3 ExMC WG 1  
Report and proposed IECEX 02 Revision ExMC/1697/DV**

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This document contains comments from the US Member Body concerning Agenda item 8.3 and proposed IECEX 02 Revision, ExMC/1697/DV of the 2021 ExMC Meeting Agenda (ExMC/1729B/DA) and are to be considered during the 2021 ExMC Meeting.

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August 9, 2021

## 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 2021 ExMC Meeting, Item 8.3, ExMC/1697/DV

Dear Mr. Agius:

The USNC/IECEX would like to thank the work of ExMC WG 01 on their proposed revisions to IECEX 02, Edition 7.2, as shown in ExMC/1697/DV to clarify requirements of the IECEX and drive consistency among ExCBs.

We request that the following revisions be removed from this edition because they appear to be more than minor changes and deferred back to ExMC WG01 for further consideration:

- **3.16, Applicant** – Remove last sentence from this clause since requirements should not be contained within Clause 3, Definitions, and consider moving to 9.7 or elsewhere.

“a manufacturer or a person which acts on behalf of the manufacturer and who applies to an IECEX Certification Body (ExCB) for obtaining, suspending or cancelling an IECEX Certificate of Conformity., an IECEX Test Report or an IECEX Quality Assessment Report. ~~Instructions to an Ex Certification Body for suspensions and cancellations shall include evidence of consultation with, and agreement by all manufacturers specified on the Certificates regarding the actions requested of the ExCB.~~”

- **8.2.2, Description of Equipment** – It is unclear why the “contact details for key personnel” of the applicant are being added to the ExTR. This information is not provided for manufacturers, does not seem to add value, and could become problematic to maintain. The issuing ExCB should have access to contact details for the key personnel of the applicant if it is needed.
- **10.2, National Certification** – The last part of the new proposed text:

“...and it is recommended that the applicant of the involved certificate(s) be informed of discussions between the issuing ExCB and the reviewing ExCB”

needs to be reconciled with Clause 5.5, *Exchange of IECEX CoCs*, which states

“Should the ExCB receiving an ExTR or QAR believe it to contain errors, the receiving ExCB shall contact the issuing ExCB before taking any action.”

- **10.3, Compliance with rules** – The meaning of the new text:


“...as the manufacturer(s) on behalf of, and in consultation with, all relevant manufacturers”

and the expectations of the issuing ExCB is unclear.

- **Annex A, B, C and D** - Consider replacement or reduction of information contained within Annexes A – D with references to proposed F-008 (ExMC/1736/DV), F-009 (ExMC/1737/DV), and F-010 (ExMC/1738/DV).

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

Sincerely,



Secretary, USNC/IECEX