



ExMC/1756/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 8.6 IECEX  
Application to the Hydrogen Economy, ExMC/1744/CD**

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This document contains comments from the US Member Body concerning Agenda item 8.6 and proposed consideration of the Hydrogen Economy, ExMC/1744/CD 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 Varembeé  
P.O. BOX 131  
CH-1211 Geneva 20, Switzerland

**Subject:** USNC/IECEX Comment Regarding the Agenda for the 2021 ExMC Meeting, Item 8.6,  
*IECEX application to the Hydrogen economy (ExMC/1744/CD)*

Dear Mr. Agius:

The USNC/IECEX thanks the Executive for preparing a discussion paper to introduce the topic of the inclusion of ISO Standards to support the developing Hydrogen economy and looks forward to Dr. Thorsten Arnhold's presentation.

Addressing the discussion paper, the USNC/IECEX supports the formation of a WG to prepare a market needs assessment and business case for ensuring the IECEX schemes cover the conformity assessment elements that address applications of Hydrogen as part of the developing Hydrogen economy. We do not support that the resulting analysis and recommendations be submitted to the IECEX Chair for approval. Instead, we believe there is an advantage of making use of the joint wisdom provided by the ExMC and IEC CAB, even with its faults, to achieve a better alternative than is likely to emerge from a single reviewer, a position supported by IEC CAB-G01. According to IEC CAB-G01, Introduction,

“The management committees (MC) of the individual CA Systems approve conceptual proposals for the development of new services or the removal of existing services. A subgroup (such as a working group or task force) may be established by the MC to develop the initial concept and to prepare a market impact analysis/business case and the recommended service parameters **for approval by the MC and by the IEC CAB** [emphasis added].”

The USNC/IECEX proposes modifying the discussion paper proposal as follows:

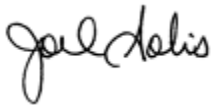
### **Proposal**

The following course of action is proposed

ExMC to form a WG to consider the business case for including the ISO Standards within the IECEX, using the newly developed CAB Document IEC CAB-G01 "Guideline for IEC Market Impact Analysis/Business Case for New and Existing IEC Conformity Assessment Services", with the result of this analysis to be considered by the IECEX ~~Chair~~ ExMC and by IEC CAB. If considered positive, work to commence on the development of an IECEX Operational Document, OD(s), to address how these standards are to be included within the IECEX System, in similar manner to OD 0280 which was developed to integrate the ISO 80079 series of non-electrical standards into the IECEX system.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Delis". The signature is written in a cursive, flowing style.

Secretary, USNC/IECEX