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

**TITLE: Compilation of comments on - ExTAG/661A/CD –** **Draft ExTAG Decision Sheet – Information relevant to particular protection Ex 60079-46 into the quality management system.**

**Circulated to: ExTAG – IECEx Testing and Assessment Group**

**INTRODUCTION**

This document, a revised version of *ExTAG/661A/CD, Draft ExTAG Decision Sheet – Information relevant to particular protection Ex 60079-46 into the quality management system*. contains the compilation of comments, as well as observations from the originators, INERIS and LCIE.

A revised document *ExTAG/661B/CD –* *Draft ExTAG Decision Sheet – Information relevant to particular protection Ex 60079-46 into the quality management system.* has been prepared for circulation and consideration.

***Please inform the Secretariat immediately of any omissions or errors at-***

***Christine Kane***

**For**

**ExTAG Chair Dr Lienesch**

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| --- |
| **Address:**  **IECEx Secretariat**  **Level 33 Australia Square**  **264 George Street**  **Sydney NSW 2000**  **Australia**  **Web: www.iecex.com** |

| **ExCB/**  **ExTL** | **Clause/ Sub-clause** | **Paragraph Figure/**  **Table** | **Type of**  **comment**  **General/**  **technical/**  **editorial** | **COMMENTS** | **Proposed change** | **Observation**  **(to be completed by the originator)** |
| --- | --- | --- | --- | --- | --- | --- |
| **BIS**  **IN[[1]](#footnote-1)** |  |  |  | **After a consultation with members of the National forum and ExCBs/ExTLs from India participating in ExTAG, it is hereby stated that we have 'no comments' on draft ExTAG/661A/CD.** |  | **Noted** |
| **CNEX-Global**  **NL** | **-** | **-** | **-** | **No comments** | **-** | **Noted** |
| **DEK**  **NL** |  |  | **G** | **The draft DS includes additional requirement to ISO/IEC 80079-34, for example by the last paragraph.**  **This is not permitted per OD035. The appropriate way to add requirements to a standard is by a new edition or an amendment to the standard.** | **Withdraw this draft DS and forward the topic to the maintenance team for ISO/IEC 80079-34** | **Not accepted. We consider this DS as clarification regarding the current requirements to ISO/IEC 80079-34.** |
| **DEK**  **NL** |  | **Answer, 1st bullet** | **TE** | **It makes no sense to relate production documentation to the certification file as it is not done at other protection methods.** | **Delete** | **Not accepted. We consider this DS as clarification regarding the current requirements to ISO/IEC 80079-34.** |
| **DEK**  **NL** |  | **Answer, 1st and 2nd bullet** | **TE** | **“should” makes a requirement not mandatory. Therefore these lines have a limited added value.** | **Delete** | **Replaced by “shall” in the new revision** |
| **DEK**  **NL** |  | **Answer, 3rd bullet** | **TE** | **It makes sense for routine tests for any protection method, that the personnel is competent. Addressing it for Ex assemblies implies it is not required for any other protection method.** | **Delete** | **Not accepted. We suggest to keep this clarification for this specific case which does not question the requirements of the other protection methods.** |
| **DNV**  **NO** |  |  |  | **We agree with the proposed decision sheet** |  | **Noted** |
| **FTZU**  **CZ** |  |  | **G** | **We agree with this draft ExTAG Decision Sheet.** |  | **Noted** |
| **ITL** | **ISO/IEC 80079-34:2018**  **Annex A** |  | **N/A** | **Acceptable** | **N/A** | **Noted** |
| **NANIO CCVE (RU)** |  |  | **General** | **We support DS ExTAG/661A/CD without any comments.** |  | **Noted** |
| **NCC**  **BR** |  |  |  | **It would be better to refer the matter to IEC MT 60079-46 for clarification of the requirement, if appropriate.**  **1) The IEC/TS 60079-46 standard does not establish a requirement for the use of QAR for certification of Ex pre-assembled equipment sets;**  **2) All requirements to be inspected (depending on the product, type of protection etc.) are already specified in the IEC/TS 60079-46 standard;**  **3) The criteria and competency records of production, assembly and verification personnel are already established;** |  | **As commented by the TC31, the purpose of this DS is to be an interim clarification.** |
| **NEPSI**  **CN** |  |  | **G** | **We support the draft DS ExTAG/661A/CD.** |  | **Noted** |
| **PTB**  **DE** |  |  | **general** | **Withhold** | **Withhold publication until ExTAGWG14 has commented (see Decision 2021/18)**  **Please consider the comments of ExTAG WG14 in the revision** | **As commented by the TC31, the purpose of this DS is to be an interim clarification.** |
| **QPS CA** |  |  |  | **QPS supports the draft ExTAG DS without comment.** |  | **Noted** |
| **RISE**  **SE** |  |  |  | **We support the Draft ExTAG Decision Sheet: ExTAG/661/CD** |  | **Noted** |
| **SGS Baseefa**  **GB** |  |  | **Gen** | **SGS Baseefa supports the contents of the proposed DS, but believes that it needs to go further, to ensure that the necessary information is recorded in similar ways in the QAR for the manufacturer.**  **As it would take longer to formalize a new version of F-001 to include a new part of Annex A, it is suggested that a first draft for the new part of Annex A should accompany this DS, so that all bodies can use a similar way of reporting. This may take the form of an expansion of the answer given in the DS but, ideally, should be drafted by ExTAG WG14. The final DS, including the draft new part of Annex A, should be sent to ExMC WG05 for further consideration.** |  | **Clarifications about the QAR is proposed in the new revision of the DS.**  **Accepted in principle. To be considered after the publication of DS as a revision.** |
| **Simtars**  **AU** |  |  |  | **Simtars has no comments.** |  | **Noted** |
| **SIRIM (ExCB)** | **-** | **-** | **General question** | **Is it necessary to issue QAR for unit verification in relevant to standard IEC TS 60079-46:2017and  ISO/IEC 80079-34:2018 ?** | 1. **SIRIM agrees with the requirement to address the relevant production, CoC and competency according to ISO/IEC 80079-34.** 2. **No further comment on the documents to be used for inspection report or QAR report to address this.** 3. **The documents probably used is QAR (if necessary) or SIRIM internal inspection report to provide information related to this issue.** | **No QAR required for unit verification.** |
| **TC 31** | **-** | **-** | **General** | **TC 31 supports this topic being referred to IECEx ExTAG WG 14 for a more complete position, but also supports this draft Decision Sheet being issued in the interim with an additional paragraph as shown. The rational for this additional text is as follows:**  **There is a need to conveniently identify within the QAR the Types of Protection that the assembly manufacturer is qualified to install based on the audit review of the competence of the assembly manufacturer. This helps the auditors to know what needs to be verified during audits and allows CBs issuing new certificates to easily confirm that the manufacturer has the Types of Protection within the assembly manufacturer’s scope.**  **We would recommend that this update of the QAR be done at the next audit.** | **Add to the Answer:**  **“****While ‘60079-46’ is a Type of Protection in accordance with IEC 60079-46, it is not to be indicated on its own as a Protection Concept on a QAR. If a QAR is to support an IEC 60079-46 assembly certification, the Protection Concept(s) field on the QAR shall read, '60079-46' followed by a parenthetical statement that itemizes the specific Types of Protection that support the assembly certification. For example, '60079-46 (d, e, m)'. “** | **Accepted** |
| **TC 31** | **Back-ground** | **2** | **Ed** | **Grammar suggestions** | **Change “..to be conform to…” to “..conform to…”** | **Accepted** |
| **TC 31** | **Back-ground** | **5** | **Ed** | **Grammar suggestions** | **Replace with:**  **“****Both LCIE and INERIS who are the originators of this proposal have not issued a CoC for an assembly linked to a QAR. Discussion in MT 60079-46 and in ExTAG WG14 has defined that inspection is required but some ExCBs have used the possibility offered by IEC TS 60079-46 and certified assemblies linked to a QAR. Since some assemblies are manufactured following the same type of assembly, it is important that all ExCBs approach manufacturing control of assemblies in the same way.”** | **Accepted** |
| **TC 31** | **Back-ground** | **6** | **Ed** | **Grammar suggestions** | **Replace with:**  **Therefore, this DS is proposed as an interim solution for manufacturing control of assemblies until ExTAG WG14 defines more clearly the rules for manufacturing control of assemblies.** | **Accepted** |
| **TC 31** | **Answer** | **2**  **Point 1** | **Te** | **Clause 5 of IEC TS 60079-46 has requirements so the expression here needs to be shall meet that clause.** | **Replace with:**  **Production documentation shall address all the items (refer to clause 5 of the IEC TS 60079-46) defined into the documentation as part of the certification file.** | **Accepted** |
| **TC 31** | **Answer** | **2**  **Point 2** | **Te** | **IEC TS 60079-14 also allows for site re-assembly so this needs to be covered if applicable.** | **Replace with:**  **An inspection of the assembly shall be performed before release from the manufacturing location and after site re-assembly if applicable.** | **Accepted** |
| **TC 31** | **Answer** | **2**  **Point 2** | **Te** | **Documentation of inspection procedures is a requirement.**  **Grammar corrections are also suggested.** | **Replace with:**  **Documented inspection procedures shall address the level and the content of the inspection, as defined in the Certificate of Conformity.** | **Accepted** |
| **TIIS**  **JP** |  |  | **General** | **We support the draft DS without comments.** |  | **Noted** |
| **TÜV SÜD PS**  **DE** | **4.4** | **IEC TS 60079-46** | **editorial** | **TÜV SÜD Product Service agrees with the proposals from LCIE and INERIS** | **-** | **Noted-** |
| **ULBR**  **BR** | **Answer section of DS** | **N/A** | **Technical** | **The decision sheet should provide guidance on the scope of the QAR required for type-certified assemblies to IEC TS 60079-46. The designation “60079-46” should not be allowed as a type of protection that may be listed on a QAR. The rationale for this is as follows:**   1. **ExCBs can have IEC TS 60079-46 added to their IECEx scope only for the Types of Protection already covered under their scope.** 2. **Therefore, an ExCB can only issue a QAR to an assembler if the QAR involves these Types of Protection.  ExCBs can be relied upon to issue QARs only to assemblers in accordance with this restriction.** 3. **However, the assembler will then be building assemblies for an extended period of time before being reengaged by the ExCB.  It could be likely in this period that assemblers might unintentionally build assemblies to other than the originally permitted Types of Protection, if the QAR only mentions “60079-46” and not the permitted Types of Protection.** 4. **In addition, if another ExCB becomes involved for one reason or another, it would not know the audited and therefore permitted Types of Protection covered by the QAR.** | **We propose to add the following clarifying text to the “Answer” section with regards to the issued QAR:**  **“****While ‘60079-46’ is a Type of Protection in accordance with IEC TS 60079-46, it is not to be indicated as a Type of Protection on a QAR.  If a QAR will be linked to an IEC TS 60079-46 assembly type certification, it can only support an assembly involving specific Types of Protection itemized on the QAR.”** | **Accepted** |
| **UL Demko**  **DK** | **Answer section of DS** | **N/A** | **Technical** | **The decision sheet should provide guidance on the scope of the QAR required for type-certified assemblies to IEC TS 60079-46. The designation “60079-46” should not be allowed as a type of protection that may be listed on a QAR. The rationale for this is as follows:**   1. **ExCBs can have IEC TS 60079-46 added to their IECEx scope only for the Types of Protection already covered under their scope.** 2. **Therefore, an ExCB can only issue a QAR to an assembler if the QAR involves these Types of Protection.  ExCBs can be relied upon to issue QARs only to assemblers in accordance with this restriction.** 3. **However, the assembler will then be building assemblies for an extended period of time before being reengaged by the ExCB.  It could be likely in this period that assemblers might unintentionally build assemblies to other than the originally permitted Types of Protection, if the QAR only mentions “60079-46” and not the permitted Types of Protection.** 4. **In addition, if another ExCB becomes involved for one reason or another, it would not know the audited and therefore permitted Types of Protection covered by the QAR.** | **We propose to add the following clarifying text to the “Answer” section with regards to the issued QAR:**  **“While ‘60079-46’ is a Type of Protection in accordance with IEC TS 60079-46, it is not to be indicated as a Type of Protection on a QAR.  If a QAR will be linked to an IEC TS 60079-46 assembly type certification, it can only support an assembly involving specific Types of Protection itemized on the QAR.”** | **Accepted** |
| **UL LLC**  **US** | **Answer section of DS** | **N/A** | **Technical** | **The decision sheet should provide guidance on the scope of the QAR required for type-certified assemblies to IEC TS 60079-46. The designation “60079-46” should not be allowed as a type of protection that may be listed on a QAR. The rationale for this is as follows:**   1. **ExCBs can have IEC TS 60079-46 added to their IECEx scope only for the Types of Protection already covered under their scope.** 2. **Therefore, an ExCB can only issue a QAR to an assembler if the QAR involves these Types of Protection.  ExCBs can be relied upon to issue QARs only to assemblers in accordance with this restriction.** 3. **However, the assembler will then be building assemblies for an extended period of time before being reengaged by the ExCB.  It could be likely in this period that assemblers might unintentionally build assemblies to other than the originally permitted Types of Protection, if the QAR only mentions “60079-46” and not the permitted Types of Protection.** 4. **In addition, if another ExCB becomes involved for one reason or another, it would not know the audited and therefore permitted Types of Protection covered by the QAR.** | **We propose to add the following clarifying text to the “Answer” section with regards to the issued QAR:**  **“While ‘60079-46’ is a Type of Protection in accordance with IEC TS 60079-46, it is not to be indicated as a Type of Protection on a QAR.  If a QAR will be linked to an IEC TS 60079-46 assembly type certification, it can only support an assembly involving specific Types of Protection itemized on the QAR.”** | **Accepted** |

1. In consultation with Intertek India Private Limited, Karandikar Laboratories Pvt. Ltd., and KL Certification Services [↑](#footnote-ref-1)