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

**Title: Compilation of Comments on ExTAG/700A/CD – ExTAG Draft Decision Sheet -** **Marking of Ex Components when intended for use only by their manufacturer**

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

**INTRODUCTION**

This document contains the Compilation of Comments and Observations from the Originator FM Approvals LLC (FMG) on ExTAG/700A/CD – ExTAG Draft Decision Sheet - Marking of Ex Components when intended for use only by their manufacturer

As a result of comments received, and considered, Decision Sheet ExTAG DS 2023/002 has now been published.

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

***Christine Kane***

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| **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 (applicant ExCB)****IN** |  |  | **General** | **No comments** |  | **Noted** |
| **CNEX-Global BV****NL** | **-** | **-** | **G** | **The marking exemption in IEC 60079-0:2017 cl. 29.10 currently regards only ‘enclosures’, stating:****The Ex marking of enclosures as Ex Components shall not be marked externally. Only the****information of bullet point a) and b) may be marked externally. The internal marking need not****be permanent. The internal markings may be omitted if the enclosure (as Ex Component)****manufacturer is also the holder of the equipment certificate, and indicated as such in the****Schedule of Limitations of the Ex Component certificate.****The new draft IEC 60079-0 Ed.8 and the now proposed DS, appears to cover ANY component.****We disagree with this approach for the following reasons:****1. Per definition in IEC 60079-0:2017 cl. 3.36:** **Ex Component =****equipment intended to be part of Ex Equipment, marked with the symbol “U”, which is not****intended to be used alone, and requires additional consideration when incorporated into Ex****Equipment****2. Per IEC 60079-0:2017 cl. 29.10: The Ex Equipment shall be legibly marked on a main part of the Ex Equipment and the****marking shall be visible, from the exterior.** **This general requirement aims to also cover Ex components.****Any CERTIFIED product is required to have their Ex marking visibly affixed.****3. If a product is not marked with the Ex marking, then it must be assumed to not be Ex certified.** **Hence, no formal EU Type Examination certificate should be issued for such an unmarked part.** **Only a Statement of Compliance might be given to detail the compliance of the product with the relevant Ex standards.** **(And, this part is for the manufacturer of the part only: why would he need a formal Certificate for his own unmarked part, which cannot be sold separately anyway?)****4. A part that is:****- only to be** **integrated by the part manufacturer into their own Ex Components or Ex Equipment, and,****- that has no Ex marking on its own, and** **- that (should) have no formal certificate,****is only a part to be used by a manufacturer as integral part of a certified component or equipment, just like any other non-certified part, fully controlled by the manufacturer’s Ex quality system.****We should avoid at all cases to create (for the sake of a few) unclear and unnecessary rules, which contradict what we normally do, which go against the established requirements on Ex product marking and that can not in any way improve the safety of a product, or clarify its purpose to end-users.****Instead of continuing this road of unnecessary requirements, please, reconsider and dare take a step back.** | **1. Withdraw this draft DS.** **2. Clarify (by DS) that the last paragraph in cl. 29.10 is related only to empty enclosures.** | **Not accepted.****The existing text of Ed 7 does address (non) “marking of enclosures of Ex Components”** 1. **Shall not be marked externally**
2. **Internal markings may be omitted if the Ex Component manufacturer is the same as the intended Ex Equipment manufacturer.**

**It does not use the term “Ex Component enclosure” as is used in 60079-1 and 60079-7, but uses “enclosure” of an Ex Component, so is more broadly applicable. This approach is already applied for Ex Components such as partial motor housings, instrumentation sensors, fuses, and the like. The use of a ”certified” Ex Component simplifies the maintenance of multiple Ex Equipment certificates where the same Ex Component is employed by the manufacturer in its internal production.****So, with no marking permitted externally, and internal marking may be omitted, there is already an option for “no marking”.****The DS is intended to drive uniformity in the completion of the “marking” section in the CoC, and offer guidance in what situations this “option” can be applied.** |
| **CSA and CSAE** | **-** | **-** | **General** | **CSA and CSAE ExTL’s and ExCB’s support this draft decision sheet** | **None** | **Noted** |
| **DEK****NL** |  |  |  | **This sheet intends to be an extension to the standard. This is not allowed per OD 035.****The standard allows to omit the marking for empty enclosures but not for all Ex Components.** **In addition, we are not in favor of omitting the marking string in the marking section in the certificate.** * **Since the marking still may be applied and**
* **This is the place where this “rating” is expected to be on the certificate**
 | **Withdraw this sheet** | **Not accepted.****The existing text of Ed 7 does address (non) “marking of enclosures of Ex Components”** 1. **Shall not be marked externally**
2. **Internal markings may be omitted if the Ex Component manufacturer is the same as the intended Ex Equipment manufacturer.**

**It does not use the term “Ex Component enclosure” as is used in 60079-1 and 60079-7, but uses “enclosure” of an Ex Component, so is more broadly applicable. This approach is already applied for Ex Components such as partial motor housings, instrumentation sensors, fuses, and the like. The use of a ”certified” Ex Component simplifies the maintenance of multiple Ex Equipment certificates where the same Ex Component is employed by the manufacturer in its internal production.****So, with no marking permitted externally, and internal marking may be omitted, there is already an option for “no marking”.****The DS is intended to drive uniformity in the completion of the “marking” section in the CoC, and offer guidance in what situations this “option” can be applied.** |
| **EPIL****IR** |  | **item 2 of the answer section** | **Technical** | **There is a concern that, according to this Extag, the manufacturers can start making components without any marks in the production line, causing problems in the process of the production line audit (according to 80079-34).** **Although item 2 of the answer section has tried to clarify this issue, it is better to explain the discussion of normal marking with Ex marking clearly.** | **Add this paragraph at the end of item 2 of the answer section:****Therefore, it should be considered that the marking is needed for the traceability of the schedule of drawings and documentation according to OD 017 (e.g. model, serial number, etc.)** | **Noted.** **This Decision Sheet can not and does not replace any of the requirements of the QMS where some means of traceability will still be required for a “significant part” such as the described Ex Component.** |
| **Fiditas****HR** |  |  | **G** | **We agree with proposed document and no further comments**  |  | **Noted** |
| **FTZU****CZ** |  |  | **G** | **We agree with this draft ExTAG Decision Sheet.** |  | **Noted** |
| **INTERTEK****GB** |  |  |  | **We support the draft DS with no additional comments.** |  | **Noted** |
| **ITS (ExTL)****IN** |  |  | **General** | **No comments** |  | **Noted** |
| **KLCS****(ExCB & ExTL)****IN** |  |  | **General** | **No comments** |  | **Noted** |
| **MASC****ZA** | **N/A** | **N/A** | **General** | **Accepted without changes.** |  | **Noted** |
| **NEPSI****CN** |  |  | **G** | **We support the revised draft decision sheet ExTAG/700A/CD.** |  | **Noted** |
| **PTB****DE** |  |  |  | **PTB accept the changes** | **---** | **Noted** |
| **QPSCA** |  |  |  | **QPS agrees with the revisions to the DS and has no further comments.** |  | **Noted** |
| **SGS****GB** |  |  |  | **SGS accepts the wording proposed** |  | **Noted** |
| **Simtars****AU** |  |  |  | **No Simtars comments for this one** |  | **Noted** |
| **TC31****WG22** |  |  |  | **WG22 experts, in general, supported the DS as drafted as it closely mirrors the proposed text for 60079-0, Ed 8.****There was concern by two experts that it could be seen as changing a requirement even though the existing text of Ed 7 does address (non) “marking of enclosures of Ex Components”** 1. **Shall not be marked externally**
2. **Internal markings may be omitted if the Ex Component manufacturer is the same as the intended Ex Equipment manufacturer.**

**It does not use the term “Ex Component enclosure” as is used in 60079-1 and 60079-7, but uses “enclosure” of an Ex Component, so is more broadly applicable.****So, with no marking permitted externally, and internal marking may be omitted, there is already an option for “no marking”.****The DS is intended to drive uniformity in the completion of the “marking” section in the CoC, and offer guidance in what situations this “option” can be applied.** |  |  |
| **TIIS****JP** | **–** | **–** | **TE** | **We agree with this decision sheet.** |  | **Noted** |
| **ULBR****BR** | **All** |  | **General** | **We support this document as currently drafted.** |  | **Noted** |
| **UL LLC****US** | **All** |  | **General** | **We support this document as currently drafted.** |  | **Noted** |