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

## Title: DE comments on proposed revision of IECEx OD 025 (ExMC/1935/DV)

To: Members of the IECEx Management Committee, ExMC

**Introduction**

This document contains comments from DE regarding the proposed revision of IECEx OD 025 as circulated as ExMC/1935/DV.

This item is to be discussed during the September 2023 IECEx Management Committee meeting in Edinburgh under Agenda Item 8.4.

**IECEx Secretariat**

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**Subject:** ExMC/1935/DV - Agenda Item 8.4 Report from Working Group ExMC WG 5

During the revision of OD 025 the WG5 has discussed the role of productions sites compared to manufacturing locations.

As a result of these discussions “production site(s)” have been deleted in the definition 3.16 Initial Assessment but in the body of the OD they are treated again in a similar way as manufacturing locations (5.2.2.1, 5.2.2.2.2 and 6.1 Figure 2)

Especially in Figure 2, and only there it is stated that a production site requires its own QAR. This stands in contradiction to IECEx OD 011 cl. 1.2.16 Manufacturing Locations, where the following is stated in paragraph 3:

*“It is* ***not*** *necessary to specify (on the Certificate or QAR Summary) the details on any Production Sites that are working under the control of a specified Manufacturing Location. To assist in planning an ExCB’s audits of Manufacturing Locations that use, control and audit Production Sites, the QAR Summary issuing ExCB may use the Comment field of the QAR Summary for the Manufacturer or Manufacturing Location to list the details of Production Sites that are audited by staff of the Manufacturer or Manufacturing Location.”*

Per definition, a production site is always under the control of a manufacturing location, which is audited and documented with a QAR. The audit at the production site is the responsibility of the manufacturer and not of an Ex CB, as it would be the case for suppliers.

The German NC therefore recommends the WG5 to revise the Figure 2 accordingly and delete the term “production site” completely from OD 025.

Thank you for your attention and support in addressing the topic. Please do not hesitate to contact me if you have any questions.

Sincerely,

Ein Bild, das Reihe, Kinderkunst, Entwurf, stationär enthält.

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