



**ExMC/2100/CD
September 2024**

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

Title: US Comments Regarding Draft Revision for IECEX 05

To: Members of the IECEX Management Committee, ExMC

Introduction

This document contains comments for the USNC/IECEX regarding Draft Revision of IECEX 05, issued as ExMC/2045/DV and scheduled for consideration at the 2024 ExMC BR Meeting.

IECEX Secretariat

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30 August 2024

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: ExMC Agenda item 11.1, USNC/IECEX comment on Clause 4.2.15 of Revision of IECEX 05, Edition 5.0 in ExMC/2045/DV

Dear Chris:

Pursuant to ExMC agenda item 11.1, clause 4.2.15 of the revised IECEX 05 Rules introduces ExPCC meeting participation requirements for ExCBs. The consequence for not attending one meeting is a reminder by the Secretariat of necessary meeting participation. If a second meeting is missed in a two-year period, then a special surveillance of the ExCB will be scheduled and if a third meeting is missed in a three-year period, an additional annual surveillance of the ExCB will be scheduled until meeting participation resumes.

We understand the importance of the expectation that ExCBs participate and maintain familiarity with requirements, but the current consequences for lack of meeting participation in the revised IECE 05 Rules seem excessive. In addition, the scope of the special surveillance and annual surveillance for those ExCBs with a lack of meeting participation is not defined, and there is not consistency across all schemes with documented meeting participation requirements. Without having experience on the effectiveness of such consequences, it seems that the meeting participation requirements should be revised to less severe consequences initially and, after three years, be reviewed to determine if the consequences should be amended.

The USNC/IECEX has proposals to resolve the issue:

- Revise 4.2.15 as follows:

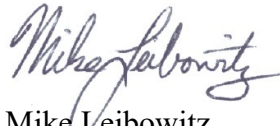
4.2.15 Meeting Participation

- a) All ExCBs shall participate in annual ExPCC meetings.
- b) If an ExCB does not participate in the annual ExPCC meeting, the Secretariat will remind them of the above requirement.

- c) If the ExCB does not participate for two consecutive annual ExPCC meetings, a special surveillance assessment will be scheduled in addition to the normal surveillance and reassessment audits.
 - d) To assist ExCBs to comply with the above policy, future meetings of the ExPCC will be convened at the same location as the annual IECEx ExMC meetings and in the same week or immediately before or after the ExMC meeting subject to meeting host capabilities.
- Recommend an action item to ExAG to define the requirements for the special surveillance assessment.
 - Recommend action items to ExMC WG01 and ExSFC to add meeting participation requirements to IECEx 02 and IECEx 03 Rules, respectively, to ensure consistent consequences for lack of ExCB participation across all Schemes.

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

Sincerely,



Mike Leibowitz
USNC/IECEx Secretary

MGL

cc: S. Kiddle