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

**TITLE: Compilation of comments and observations on ExTAG/549/CD Restricted installation requirements for Annex F**

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

**INTRODUCTION**

This document contains the compilation of comments received on *ExTAG/549/CD Restricted installation requirements for Annex F* along with observations from the originator, UL LLC, US.

As a result of comments received and considered, a revised Draft Decision Sheet *ExTAG/549A/CD Draft ExTAG Decision Sheet - Restricted installation requirements for Portable Intrinsically Safe Equipment using Annex F* has now been published for consideration and is issued for additional consideration over a six week period.

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

***Christine Kane***

On behalf of Mr. Julien Gauthier

***Julien Gauthier***

***ExTAG Secretary***

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| **Address:****IECEx Secretariat** **Level 33 Australia Square****264 George Street** **Sydney NSW 2000****Australia****Web:** [**www.iecex.com**](file:///C%3A%5CUsers%5Cjugauthier%5CAppData%5CLocal%5CTemp%5CnotesC9812B%5Cwww.iecex.com) | **ExTAG Secretary****Mr Julien Gauthier****LCIE S.A.****33 Avenue du General Leclerc****92260 Fontenay-aux-Roses****FRANCE** **Tel: +33 1 40 95 55 26****Fax: +33 1 40 95 89 37****Email :** **julien.gauthier@fr.bureauveritas.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)** |
| --- | --- | --- | --- | --- | --- | --- |
| **CNEX-Global BV** | **-** | **-** | **-** | **No comments** | **-** | Noted |
| **CML****GB** |  |  | **TE** | Disagree - there is nothing in IEC60079-0 nor IEC60079-11 which suggests the term "installation" is only applicable to fixed equipment. If this interpretation of the word "installation" were to be applied universally, then portable apparatus would not be allowed in mines since the definitions of Ma and Mb in 60079-0 refer to "equipment for installation in mines".The risk of portable apparatus being taken into an area with inappropriate pollution degree is no different to the risk of portable equipment being taken into an area with an inappropriate EPL.  | Do not issue the DS. Forward the issue to the maintenance team and suggest changing the wording to “installation or use” | **Not accepted, the clarification is supported by both TC31/WG22 and TC31/MT 11** |
| **ExTC****AU** |  |  | General | We support the proposed Decision Sheet.The title should include the words ‘portable equipment’ and ‘intrinsically safe’ as those words are pertinent to search the document when issued | The title should of the Decision Sheet should be revised to “Restricted installation requirements for Portable Intrinsically Safe Equipment using Annex F | Accepted. |
| **EXV****GB** |  |  |  | We don’t agree with the answer because the two below arguments:1. This answer is changing and extending the limits of this clause which is not adequate for an interpretation.
2. The decision about whether a portable device can be used in pollution degree 2 is up to the user. As long the product is marked, the user should be able to decide if that device is appropriate for that environment or not (as the7y already do with the EPL and Gas Group etc.). There are applications in laboratorial environments with explosive atmospheres that would suit the marking for portable devices.
 |  | **Not accepted, the clarification is supported by both TC31/WG22 and TC31/MT 11** |
| **FME****GB** |  |  | Te | We agree with the original DS as drafted.The definition for “portable equipment” is defined in IEC 60079-0.equipment, portableequipment intended to be carried by a person during operationNote 1 to entry: Portable equipment carried by a person during operation is sometimes referred to as hand-held equipment.Unless the person also carries the “installation” with him, portable equipment is not “installed” and could potentially be moved to any area as described in the proposed “Answer” making it impossible to consistently comply with Pollution Degree 2 requirements. | No change necessary. | Noted. |
| **INERIS****FR** |  |  |  | **We are in favour of the ExTAG/549/CD.** **In our opinion, it is better to specify this restriction and not authorized a portable equipment which is designed in accordance with Annex F and which is not IP54.** **When a fixed equipment is used it possible to control the environment where this equipment is used.****However, for a portable equipment, it can be used everywhere. A condition of use can’t be sufficient to control the environment where it can be used.** | **None** | Noted |
| **LOM****ES** |  |  | **General** | **LOM supports this DS as it is.** |  | Noted |
| **NANIO CCVE (ExCB and ExTL)****RU** |  |  | **General** | **We support the DS ExTAG/549/CD without comments.** |  | Noted |
| **NCC****BR** | **6.1.2.3 c)****F.2** |  |  | **We agree.** |  | Noted |
| **NEPSI****CN** |  |  | **T** | **We don’t support the draft decision sheet ExTAG/549/CD, because we consider it is possible for portable equipment to technically use the “X” marking and restriction for application in a pollution degree 2 environment in order to make use of the reduced separation requirements in Annex F.** | **We suggest to transfer this issue to MT 60079-11.** | **Not accepted, See TC31/MT 11 comment.** |
| **Presafe****NO** | 6.1.2.3 c)F.26.1.2 c)F.2 |  | **TE** | **DNVGL Presafe supports the proposal.Portable apparatus is not for fixed mounting in an enclosure providing at least pollution degree 2.** |  | Noted |
| **SGS Baseefa** |  |  | **Ge** | **Agree with proposed response** |  | Noted |
| **SIQ****SI** |  |  |  | **Thank you for the documents. We agree with proposal.** |  | Noted |
| **TC31/WG22** |  |  | **ge** | WG22 supports the Decision Sheet as drafted, noting that “portable equipment” is defined in IEC 60079-0.equipment, portableequipment intended to be carried by a person during operationNote 1 to entry: Portable equipment carried by a person during operation is sometimes referred to as hand-held equipment.Unless the person also carries the “installation” with him, portable equipment is not “installed” and could potentially be moved to any area as described in the proposed “Answer” making it impossible to consistently comply with Pollution Degree 2 requirements. | None, but we support the MT 11 comment is a valid clarification. | Noted |
| **TC31/MT 11** |  |  | **ed** | In the answer, the use of the words “permanently” and “cannot” can lead to further confusion and interpretation possibilities that must be avoided. | Replace the answer with:“No, the term “installation” as used within IEC 60079-11 does not include portable equipment. The Standard assumes that there is always a risk that portable equipment could be carried to an area that is not pollution degree 2 or better.” | **Accepted, DS will be revised accordingly.** |
| **TIIS****JP** |  |  | **G / T** | **The reason described in Answer that portable equipment is moved from place to place is not very good. The standard requires “installation”. Therefore, Answer should be modified slightly.** | **Revise Answer as follows:** **No. As portable equipment is not permanently installed, it cannot be ensured that portable equipment meets the requirement of installation condition in 6.1.2.3 c) and 3rd dash of F.2.** | **Accept in principle, see TC31/MT11 response** |
| **ULBR****BR** |  |  | **General** | **ULBR supports this draft Decision Sheet (ExTAG/549/CD) without comments.** |  | Noted |
| **ULD****DK** |  |  | **General** | **UL Demko supports this draft Decision Sheet (ExTAG/549/CD) without comments.** |  | Noted |