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**ExMC/2016/CC**

**Feb 2024**

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

## Title: Response to Comments of the proposed amendment to IECEx OD 099, Edition 1.0

To: Members of the IECEx Management Committee, ExMC

**Introduction**

This document contains a summary of the comments received on amendments to Edition 1.0 of IECEx OD 099 as circulated as ExMC/2016/CD following discussions at the 2023 ExMC meeting on response to submissions from USA and China Members.

The observations of the IECEx Secretariat and actions taken in response to the comments received and applied in the updating the draft amendments to Edition 1.0 of IECEx OD 099 are also included.

**IECEx Secretariat**

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**Document Title:** IECEx Secretariat Response to Comments on Draft IECEx OD 099, Edition 2.0 circulated as ExMC/2016/CD

**IECEx Member Bodies Submitting Comments**: USNC, DE NC & CNNC (INNC and NLNC responded that they have no comments)

| **IECEx Member Body**  **(Country)** | **Clause/ Sub-clause** | **Paragraph Figure/**  **Table** | **Type of**  **comment**  **General/**  **technical/**  **editorial** | **COMMENTS** | **Proposed change** | **Observation** |
| --- | --- | --- | --- | --- | --- | --- |
| USNC/ IECEx | Annex C |  | general | Refer to ExMC/1981/CD –  some ODs do not have a Working Group (WG) assigned, and particularly ODs under the responsibility of ExTAG as” Delegated to”. | Updates of the “Not delegated” entries to indicate the currently assigned WG. | Where the managing Committee has NOT delegated work to a WG for the publication, the responsibility is retained by the managing Committee. The draft revision has had text added to clarify this in addition to the existing text in Clause 8.2 |
| USNC/ IECEx | all |  | editorial | Refer to ExMC/1981/CD - navigation through the main text in the document can become confusing since the heading of each main clause does not display the numbering structure | Number headings of each main clause | Draft revision reformatted to include numbering of ‘main clauses’ as Heading1 format |
| USNC/ IECEx | 8.1, 8.2, 9, 10, 11, 12 | - | editorial | Replace bullets with sub-clause numbering to make easier reference to specific requirements. | Replace bullets with sub-clause numbering. | Proposed change NOT included as the bulleted items each relate to the clause and are not subclauses (and do not have or need separate subclause headings that would simply repeat the text of the bulleted items |
| USNC/ IECEx | 13 | - | editorial | The current sub-clause numbering is 1, 11, 12. | Revise numbering to 13.1, 13.2, 13.3. | Proposed change NOT included for the reasons stated above & current subclause headings changed to bulleted items for consistency of formatting across the document |
| USNC/ IECEx | Annex A | - | editorial | Add reference to IECEx 01-S under IECEx Supplement to the HBR to align with change to IEC CA 01 in previous row. | See comment. | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex A | - | editorial | Add reference to Annex C for IECEx Operational Documents that provide guidance (for example. IECEx OD 011-#) | IECEx Secretariat - refer Annex C | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex A | - | editorial | Add reference to online for the IECEx bulletin.  Replace “ExMC” with “Member Body” as the document approver for the IECEx Online Bulletin.  Add reference to IECEx OD 211 under IECEx Reference Procedure. | IECEx Online Bulletin  ~~ExMC~~ Member Body  ~~Nil~~ IECEx OD 211 | Proposed change included in revised draft revision  Proposed change NOT included as member bodies ‘approved’ the development and provision of the IECEx Bulletin via ExMC Decision 2023/22 as members of the ExMC and NOT as separate bodies nor as a non-defined ‘Member Body’ as proposed  Proposed change included in revised draft revision |
| USNC/ IECEx | Annex C | - | editorial | The maintenance of IECEx OD 010-1 is the responsibility of the ExTAG Working Group 01 (ExTAG WG01) for the preparation and maintenance of IECEx assessment and test report forms | ExTAG WG01 | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex C | - | editorial | The maintenance of IECEx OD 010-2 is the responsibility of the ExTAG Working Group 01 (ExTAG WG01) for the preparation and maintenance of IECEx assessment and test report forms. | ExTAG WG01 | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex C | - | editorial | IECEx OD 012 | ExTAG WG04 | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex C | - | editorial | Remove comment “To be renamed as IECEx OD 423” | IECEx OD ~~023~~423 | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex C | - | editorial | IECEx OD 031 | ~~Not delegated~~ ExMC WG 14 | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex C | - | editorial | IECEx OD 203 | ~~ExMC WG1~~ExMC WG 11 | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex C | - | editorial | There is no document with the number OD 205. | Delete IECEx OD 205 row | Proposed change included in revised draft revision – text of draft OD 205 now published as F-013 |
| USNC/ IECEx | Annex C | - | editorial | IECEx OD 233 | ~~ExTAG~~ ExMC WG 18 | Proposed change included in revised draft revision |
| USNC/ IECEx | Annex C | - | editorial | IECEx OD 280 | ~~ExTAG~~ ExMC  ~~Not delegated~~ ExMC WG 15 | Proposed change included in revised draft revision |
| DE NC/IECEx | 14 | Figure 1 | General | Display of error message “Error! Reference source link could not be found” | Update link and insert in Figure 1 | Proposed change included in revised draft revision as a correction of text formatting |

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| CN |  |  | G | In general, we appreciate the immediate revision work undertaken by the Secretariat in accordance with decision of Edinburgh ExMC meeting on the proposals by China and USA.  The detailed comments on the draft revision of OD 099 are listed as follows. |  | No comment needed |
| CN | 1 | 1 | E | Section 3-5 define the types and levels of IECEx documents。 | “Section 2” should be changed as “Section 3 -5”. | Section 2 changed to Section 3 in revised draft revision |
| CN | 2 | Table 1 | E | Add the abbreviations “WG” and “OD”. | Same as left. | Proposed change included in revised draft revision |
| CN | 7.3.1 |  | E | The serial numbers of the requirements are incorrect. | 8 \ 9 \ 10 should be 2/3/4. | Numbered items now bulleted items in revised draft revision |
| CN | 13 | 1 | E | Add “If a new WG is established, this document should be updated in a timely manner.” | Same as left. | Proposed change included in revised draft revision |
| CN | 13 |  | E | The serial numbers are incorrect. | 11 \ 12 should be 2/3. | Numbered items now bulleted items in revised draft revision |
| CN | Annex A |  | E | Add document number “IECEx 01-S” for the document “IECEx Supplement to the HBR”. | Same as left. | Proposed change included in revised draft revision |
| CN | Annex A | Table | E | Insert a new document “IECEx Brochure” after the document “IECEx Bulletin” | Same as left. | Proposed change included in revised draft revision |
| CN | Annex A | Note 8 | E | Add the document type of Compilation of Comments as “CC”. | Same as left. | Proposed change included in revised draft revision |
| CN | Annex B | Table | E | Insert the document “IECEx CA 01” as first line. | Same as left. | Proposed change NOT included in revised draft revision because there is no document known as IECEx CA 01. IEC CA 01 is not under the control or responsibility of the IECEx System |
| CN | Annex C | Table | E | Insert the document “IECEx OD 001” as the first line. | Same as left. | Proposed change NOT included in revised draft revision because OD 001 is NOT a published Operational Document and is outside the scope of IECEx OD 099. |
| CN | Annex C |  | E | Change the comment for IECEx OD 023 from “To be renamed as IECEx OD 423” to “Replaced by IECEx OD 423”. | Same as left. | Intent of proposed change included in revised draft revision |
| CN | Annex C |  | E | Add a comment “Replaced by F-013” for the document “IECEx OD 205” | Same as left. | Intent of proposed change included in revised draft revision |
| CN | Annex C |  | E | Add a comment “Replaced by F-004” for the document “IECEx OD 505” | Same as left. | Proposed change included in revised draft revision |
| CN | Annex C |  | E | Insert a new document “IECEx OD 506” after the document “IECEx OD 505”. | Same as left. | Intent of proposed change included in revised draft revision |
| CN | Annex B  Annex C |  | E | Assign a WG to dynamically adjust the OD 099 when a new WG is established. | Same as left. | Proposed change NOT included in revised draft revision because the draft already states that the Document Owner is the ExMC and maintenance is delegated to the IECEx Secretariat. |
| CN | Annex D |  | E | Add a comment “Replaces IECEx OD 205” for the form “F-013”. | Same as left. | Intent of proposed change included in revised draft revision |
| CN | Last page of the draft OD 099 |  | E | The document number given in the bottom left corner of the last page is incorrect. | The document number should be changed as “IECEx OD 099:2023”, not “IECEx OD 315-5:2023”. | Proposed change included in revised draft revision |