Discussion & Actions ARP 0108:2007   6 October 2009

Following a meeting with DME (Anthony Countinho) by industry and its vendor representatives (via SAFA) on 3 September 2009, below is the list of discussion points & actions:

1. The DOL was not available for the meeting.

ACTION: Anthony agreed to discuss the issues raised with the DOL representatives.

2a. With respect to the one year validity of IA certificates for imported apparatus, the following options were tabled:

1) Extend the validity to 3 or preferably 5 years. The QAN needs to be reviewed when expired. QAN typically has approx. 3 year validity and lists all products manufactured at that site. Does the importer have responsibility for keeping updated QAN or does the QAN need to be reviewed by the ATLs? Does the ATL only check QAN on the certificate update?
2) A once off IA certificate for recognised overseas authorities & suppliers where the importer can demonstrate an audit trail & quality system. For example see the MTL QAN that lists every product manufactured, which site & references the relevant ATEX (or IECEx certificate)

ACTION: Mr. Coutinho will review/discuss with DME & DOL & respond.

2b. The definition of "New" equipment. Any product being imported needs an IA certificate. Product in stock at the supplier, intermediate or end-user does not require an IA certificate provided there is evidence.

2c. Ownership of IA certificate: The importer owns the certificate, but the ATL has the authority to recall the certificate. The ATL may want to publish the certificate (Published under IECEx and ATEX certification systems); there was a discussion on possible abuse.

2d. Certification of package units (imported skids, panels etc.)and later replacement of portions of a package with other certified components. Ideally all individual components should be certified as part of whole skid. Components listed do not have individual IA numbers. Non-identical replacements will require the skid to be re-certified. The ATLs have had some experience on this issue and should be consulted for advice.

2e. Requirements for marking of equipment with the ATL logo and IA certificate number: A proposal for fixing/attaching IA certification identification tags needs to be submitted to the DME/DOL for acceptance." This should go via the normal Ex working group.

2f. Existing intrinsic safe typical loops: IS loop approvals do not require updating with new IA certificates provided there is a valid IA certificate and there have been no changes in parameters.

2g. Emergency maintenance replacements: See 2f. This sits between the end-users & the DOL. Further discussion is required. This would be the responsibility of the Approved Inspection Authority.

2h. Adoption of the IEC EX scheme will not eliminate the need for IA certificates. IECEx certificates are simply reviewed & then an IA certificate issued. This could be reviewed in time.