

ATEX Standards Updates: What you Need to Know

What exactly do you do when the standards your ATEX product is certified against are withdrawn?

The answer has been elusive for the last few years, but is all the more poignant now that the withdrawal dates of some of the EN 50014 series standards have passed. And why should this concern you anyway?

Sira's Certification Manager, David Stubbings, discusses the recent changes in technical standards and the points you need to know in order to comply with the Directive.

The Legislative Situation

The ATEX Directive requires that technical knowledge, which can change rapidly, must be taken into account as far as possible and utilised immediately. This has led to questions over who decides what is the latest technical knowledge (sometimes referred to as 'The state of the art'). The ATEX Guidelines refers to the 'Community of Stakeholders' making this decision, unfortunately they don't meet as an entity and therefore there is no decision maker. Generally it is accepted that the issue of new or revised standards is an advancement of technical knowledge.



Firstly, the manufacturer must determine whether changes to the standards apply to their product.

The changes in the standards are now being helpfully referenced in the foreword by CENELEC and CEN, the two standards issuing bodies in Europe. But don't treat this as an exhaustive list; some small but important changes can be overlooked in the foreword.

To simplify matters, the recommended action that you need to take is:

- Review your product against the recently issued standards (EN 60079 series) and determine whether there have been any changes that affect your product.
- If there have been changes that bring in more onerous requirements, then have your certification revised and updated.
- If there are no more onerous requirements, then modify your Declaration of Conformity to refer to 'Compliance with the following standards' (i.e. remove the reference to harmonised standards).
- You should continue to reference the standards that are listed on your certificate, until it is upgraded to the latest EN 60079 standards
- It may also be wise to include a note under the standards, on your Declaration, stating 'the requirements of these standards have been checked against [EN 60079-0 and EN 60079-11 etc as applicable] and there were no differences affecting the latest technical knowledge for the product identified on this declaration.

The first couple of items on the list above are the biggest stumbling block. Most manufacturers rely on the expertise of Notified Bodies to know which clauses apply and which don't. Although lists of comparisons between standards are published, it may not be apparent which clauses apply to your product in the first place. With intrinsically safe equipment,

even the experts have to think it through carefully.

There is also the problem that when equipment is incorporated into an assembly of parts (particularly true for components) whoever manufactures the assembly will want to comply with the latest standards. It is not easy to convince people that a product compliant with older standards, where technical knowledge hasn't moved on, doesn't need to show compliance with the latest standards.

An easier option is to simply have your Notified Body update the product to the latest standards for you, referencing the new standards on your certificate. Yes it will cost your company money, but there is no reason why you can't supply assessment information to assist in the evaluation and therefore reduce overall cost.

The alternative is to risk a possibly misinformed customer firmly telling you your certification is out of date. The issue of certificate expiry dates was also put forward at the last UK Notified Bodies meeting, as a suggestion to solve this long-standing issue, but it is still under discussion so it isn't in the ATEX Guidelines.

On a final note, the Official Journal of the European Union lists the harmonised European standards. You mustn't state on your Declaration of Conformity that a standard is harmonised if it isn't on the list. But the Official Journal list hasn't been updated recently so unfortunately it includes withdrawn standards that shouldn't be there. The simplest solution to this is to remove reference to 'harmonised' when referring to any standards on your Declaration. It's not mandatory to use them to prove compliance.

Repairs

Repairing a product is to bring it back into conformity with the original documentation or certification standards. Companies should refer to EN 60079-19 for guidance.

Repairs must be undertaken by a competent person, therefore end users must satisfy themselves that their chosen repair company is competent to carry out

the work. There is great interest in Sira's Service Facility Certification Scheme and for certification of personnel working in hazardous areas or with hazardous area equipment, Sira's Competence Professional Scheme. These schemes can be a more certain route to demonstrating competence and proving capability to your customers.



When repairing electrical equipment, a workshop not affiliated to the original manufacturer will more than likely struggle to obtain technical detail to assist them in the repair. These types of repairs are limited to those where visual observation is sufficient to determine the specification of replacement parts.

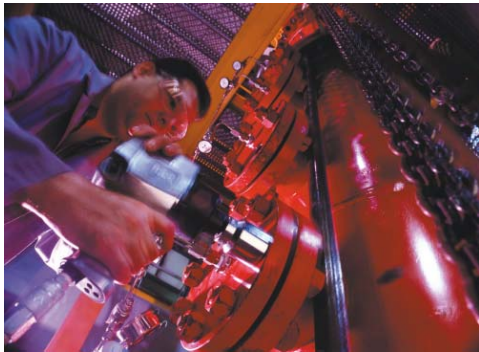
For non-electrical equipment, any component that is ATEX compliant should be replaced with an identical replacement part. Other items such as seals or bearings can be replaced on a like for like basis.

If you are working on equipment certified before ATEX, you can still follow the guidance above, except that any component part marked with an old style certificate number (i.e. without 'ATEX' in it - Ex 98E1096U) will not be possible to buy in Europe. Someone could have the right part in store, and therefore it would be considered to be already 'placed on the market', if it was purchased before 1st July 2003, so it would be all right to fit it. Otherwise contact the original manufacturer and ask for a recommended

alternative spare part, which may well be ATEX approved as a Component or Equipment in its own right.

A simple example would be an old increased safety junction box with some broken terminals. You should find that the manufacturer will continue to sell an identical terminal with an ATEX certificate number. If you have intrinsically safe equipment that is battery powered, the battery may be covered by a component certificate. Provided you buy a part identical to the original from the original manufacturer, this would be acceptable. Keep a record of the details of the repair.

Modifications



The company repairing ATEX equipment must decide whether the modification is 'substantial'. This is another woolly term that we must grapple with. My recommendation is that you consider a substantial modification is one that affects the explosion safety features of the original product or one that changes the intended use of the product. An example would be a flameproof motor, where modification of the endshield to incorporate a new accessory has led to new flamepaths, or a change to the original flamepath dimensions (note that simply dressing or polishing existing flamepaths to remove pitting would not be considered a substantial modification). Alternatively it could be that the motor has been rewound to have a different rating.

In the cases illustrated, these modifications require the company to have the modifications considered by a Notified Body. Sira has conducted several evaluations of modified equipment and this need not be a complicated process. We are aware that most work of this nature is

on a tight timescale and we work with the client to help them meet delivery times.

As a final note on repairs and modifications, be sure to keep records of all changes. For modifications, it will be best to keep all design information and a record of assessments so that anyone scrutinising the file later can see a reasoned argument for the conduct of the modification.

How Can Sira Help?

As the UK's Premier Notified Body for ATEX certification, Sira can offer compliance services to ensure that your products are up-to-date with the latest technical requirements.

These services include advice on standards updates including assessment of any differences and upgrading of your ATEX certificate to the latest technical standards. Please contact Sira for more information.

More Information

For more information on the points raised in this article, or to discuss your compliance requirements, please contact Sira:

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Further information on the hazardous area personnel certification Competence Professional Scheme & Service Facility Certification Scheme can be found by logging onto www.siracertification.com