Regulation (EC) 391/2009 Art. 10.1 Mutual Recognition Technical Review Meeting 29 November 2018 in Hamburg





Technical Review Meeting Report

November 2018

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Executive Summary

A full day's Mutual Recognition Technical Review Meeting (MR TRM) was organized on 29 November 2018 at The Madison Hotel in Hamburg by the EU RO MR Group (MR Group).

The aim of the MR TRM was to:

- present the current status of the MR TR development process Tier 1 to Tier 7 products and enable the collection of feedback on MR technical issues regarding new and existing MR TRs and the MR certification process;
- introduce the status of development of the new Product Evaluation Process (PEP);
- talk about suitable (type approved) products for further MR TR development;
- discuss with industry participants their respective input and proposals.

The MR TRM was attended by representatives of the European Marine Equipment Industry and other relevant associations along with members of the EU RO MR Technical Committee to enable a two-way exchange of technical information on the development and maintenance of MR TRs.

Overall, the feeling expressed by those attending the MR TRM was, that there were useful and constructive exchange of technical and procedural information related to the MR process under a collaborative atmosphere.

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Introduction

This MR TRM was organised by the EU ROs to present the current status of the MR TR development process and to enable the collection and initial discussion including review of feedbacks on MR technical issues regarding new and existing MR TRs and the MR certification process. It was also an opportunity to provide information on the existing MR TRs and related Change Requests and/or Requests for Clarification.

Further, the future model to evaluate products for the MR scheme was introduced and explained with the help of an example product as suggested by one of the participating industry representatives.

The MR TRM was attended by representatives of European based Marine Equipment Industry Associations and manufacturers along with members of the EU RO MR Technical Committee. It encouraged a two-way exchange of technical information on the development and maintenance of MR TRs. The list of representation can be found in Appendix A.

The meeting was chaired by the Technical Committee Chair of the EU RO Group (LR), supported by MR Group Secretariat and members of the EU RO MR Technical Committee. Lead AdHoc Group Risk II (ABS) presented the status of development of the revised methodology for safety criticality assessment being under review since 2017.

Details of the agenda of the MR TRM can be found in Appendix B.

The MR TRM objectives were to:

- Present the current status of the MR TR development process and collected feedback on technical issues;
- Introduce the development status of the Product Evaluation Process (PEP);
- Provide an opportunity for industry input on the development and maintenance process of Mutual Recognition Technical Requirements (MR TRs) as well as on product consideration.

This report provides an overview of presentations as delivered during the TRM and summarises the discussions and conclusions that were drawn from the MR TRM. It also lists the follow up activities.

EU RO MR Group Presentations

This paragraph summarizes the content of the presentations given by the EU ROs (Appendix C).

Presentation 1: Update on TC activities

Overview of the agenda and topics in and out of scope for the MR TRM.

- TR Development (Tier 7 industry consultation)
- TR Maintenance

Summary of the actions taken during Tier 7 TR development and the industry consultation phase of the Tier 7 MR TR development project with overview of feedbacks received so far.

Summary of TR maintenance process including industry feedback on technical issues relating to TRs that had been collected under use of the MR Group's maintenance process and procedures.

Presentation 2: Product Evaluation Process (PEP)

Introduction of the Product Evaluation Process (PEP)

Industry Presentations

This paragraph summarizes the presentations given by Industry representatives (Appendix D).

Presentation 1: Danfoss: Variable Speed Drives

Presentation 2: SIEMENS AG: Comparison pilot devices - position switches

Presentation 3: SIEMENS AG: MR TRs vs class rules

Overview of TRM Discussions

1. Introductions and welcome addresses

Introductions and welcome addresses were given by the Moderator (LR), and the EU RO MR Technical Committee Chair (LR) followed by an introduction round table of the meeting participants.

The Moderator introduced the aim and objectives of the meeting, reminding that all EU ROs are competitors, and emphasizing that no business model related topics, no political discussions, no lobbying and or questions related to IACS involvement are seen as appropriate.

The Moderator reminded that the TRM is a workshop style meeting focussing on the exchange of technical issues, gathering issues of interest from the participants.

After a welcome note by TC Chair, the Moderator addressed the participants emphasizing that the TRM is intended to be the forum for focusing on technical and procedural related aspects of the TR development process to improve the effectiveness of product related technical requirements, but also on the implementation and maintenance process of existing TRs.

An introductory tour de table allowed for an overview over the background of the participants.

Danish Maritime (DM) representative and lead of the Class Group in SEA E acknowledged that the meeting is to discuss technical issues, but that the meeting is also seen as part of the process to lead to a certification regime scheme that is more cost effective and reduces administrative burden.

The MR Group's Technical Committee Chair introduced the meeting agenda.

The Moderator presented the governance of the MR Group as backbone of the work to comply with Art 10 (1), Reg 391/2009, reiterating that the rules of competing class societies serve as basis for the development of the TRs. As the first contact, Secretariat is the entry point of all inquiries coming from stakeholders.

2. Update on TC activities

TC Chair lead through the technical work of the MR Group, starting with an overview of the status of certificates as a breakdown by region and by product group. TC Chair then presented the TC involvements, outlining the developments since the last TRM and improvements of procedures and resulting documents to ensure consistency in the implementation and maintenance of TR's, (Request for Clarification [RfC], Change request [CRF], Alert Process, Maintenance Procedure, Product Consideration Process [PCP]).

It was highlighted that the new and improved website now offers a more user- friendly layout and providing comprehensive information on MR processes.

Participants were reminded to subscribe to the website to get alert for news and thus get access to the information provided by the MR Group.

TC Chair presented details and examples of the technical and procedural work in 2018 and gave an outlook on the future work (e.g. finalize Tier 7, TR maintenance with reference to alignment

proposals, consistency and simplification aspects). She further explained the status of TR development asking industry to further support the development by suggesting products/ products groups to be evaluated using the future Product Evaluation Process (PEP).

It was explained that the revised risk model will be presented to the industry in this meeting for the first time. It was emphasized that this model is still under development based on results and feedback from test cases and one pilot case. The old SRBM is still valid and to be used for the time being. It might be used on base of exceptional cases as a generic model, but it is still subject to adaption to incorporate the lessons learnt and industry comments, once made available in a consultation phase.

It was explained that when deciding how to set up the risk assessment methodology, other standardization entities assessing risks have been inquired and the MR Group made a comparison of existing models to find a way to simplify the approaches to serve the purpose of complying with Art 10(1) of Regulation 391/2009. This led to the first risk model (SRBM). The further development of this model serves the purpose to enable application of more filters to allow a more complex review and to give better technical background on the process and product.

Once the PEP Model is in the stage that it is ready, the MR Group strives for a system through the website, where the experts can directly go through the PEP process, so that it is as transparent and useable as possible.

However, for the time being, the model is under development. A test phase has been arranged to feedback experience with the lessons learnt. The test case product that was presented during the meeting (Variable Speed Drives, VSD) had been tested on the basis of the current status of the new model. The same product was previously not assessed eligible for MR.

On a question related to the referencing of standards, TC Chair explained that the Technical Requirements are based on the most stringent requirement, so whatever standard is used in individual TACs, the MR Group needs to rely on the individual class rules with the highest standard.

Industry was encouraged to raise questions related to the referencing of standards to the MR Group in writing, if further details are required.

TC Chair provided a summary of the TR maintenance process including industry feedback on technical issues relating to TRs that had been collected under use of the MR Group's maintenance process and procedures.

With regard to the maintenance process of existing TRs it was outlined that the process will need to be brought into the next iteration to accommodate for the comments that have been.

TC Chair presented the principles of maintenance and the maintenance status of MR TR as of Nov 2018 as well as the status of certificates issued for individual product groups. The trend of rising number of certificates issued shows a positive trend.

TC Chair presented considerations regarding the review of existing TRs in a maintenance process, taking into consideration the no. of certificates issued. The content of review is envisaged to include testing requirements, referenced standards, updates of standards, references to other TR', editorial alignment and limitations and their origin.

The MR Group shared first ideas on product grouping and the approach.

Industry input during consultation phase

The Moderator stated that there was a relatively low interest from industry with regard to the technical consultation process of Tier 7 product TR development (only 2 comments received on the draft Tier 7 TRs).

SIEMENS corrected the impression that they as a company have provided direct comments. The comments have been provided through IEC Standards Committee and not from SIEMENS.

Product Evaluation Process (PEP)

The Lead AdHoc Group Risk II (ABS), introduced the principles and current status of the Product Evaluation Process (PEP).

The concept was explained, and questions were clarified or taken on board for further consideration. The MR Group explained the intention to publish the PEP on the website to enable manufacturers to make a pre-assessment whether their products can be considered for MR and can subsequently be developed. Guiding questions will support the assessment process. Any type of product can be assessed under PEP.

Two manufacturers raised the question whether in case of an integrated system, an MR certified component can potentially be part of achieving the unit certification. In this context, it was clarified that individual TA certificates cannot correlate with the MR TAC process.

FUA 1: Establish a respective position (MR Group)

A manufacturer shared his experience that there is always the need to have two certificates: TAC together with MR TAC due to non-acceptance of MR TAC by non-EU flag states.

Questions were clarified on the important concept of all ROs that if it comes to system integration, ROs need to always look at the application limitation and whether a product is intended to be integrated into the essential systems.

A manufacturer brought up the question how to go forward with MR TAC to be integrated in systems and what effect such integration does have on the software, i.e. how can software be handled in the MR scheme. This question will be discussed further by the MR Group, e. g. to state software limitations on the certificates, which would require not to change the versioning.

FUA 2: Address how to handle software in the MR scheme (MR Group)

FUA 3: Update the PEP model, and – upon approval - present it to the industry for consideration (industry consultation) (MR Group)

Presentations by Industry

Danfoss on Variable Speed Drives

Danfoss appreciated that the MR Group has already addressed the proposal for product consideration. 90% of their products are of shelve for which MR certification would be favourable in the market. The respective benefits for Danfoss were highlighted.

Based on previous contacts, their product Variable Speed Drives (VSD) was tested to the new PEP-MR by the TC members of each EU RO with the following results: All reviewers except one found the VSDs to be eligible for MR, however, EU RO's Rules limit eligibility for MR when the VSDs are above a certain capacity (kW, kVa) and intended to be installed in an essential services system.

FUA 4: Further work on this test case in cooperation with Danfoss (Technical Committee)

SIEMENS AG: Comparison pilot devices – position switches

SIEMENS elaborated on inconsistencies between the TR Pilot Devices Version 0.1, adoption date 1 July 2018 and the draft TR Position Switches Version 0.0, adoption date 1 January 2019 and proposed possible solutions for alignment. This input was already handed in to the MR Group during the industry consultation phase for the TR development and has been handled by the MR Group. Partly, the proposals have already been taken on board (Position Switches), partly the proposals will be considered in the maintenance cycle (Pilot Devices).

FUA 5: Justification Letter will be sent in reply to the input by IEC Standards Committee during the industry consultation phase of Tier 7, SIEMENS reading in copy (Secretariat)

SIEMENS will be informed about the outcome of the respective maintenance activities

SIEMENS AG: MR TR versus class rules

SIEMENS exemplified that individual class societies only have one document for different kind of devices, where TRs are individual documents covering related fields. There is for example only one class rule document versus 8 MR TRs for low-voltage switchgears.

One EU RO commented that they have one dedicated document for each product in order to provide unambiguous requirements. It has to be taken into account that MR needs to cover several competitors, so there are advantages and disadvantages with the setup.

SIEMENS made a general comment on combining similar products into one TR and suggested that the reduction of different MR TRs to one document would avoid effort and confusion and proposed to establish one MR TR for all low-voltage devices in accordance with the already existing class rules of the individual class societies.

SIEMENS further commented on harmonising technical documentation for similar products and in particular advocated for harmonizing type testing requirements. The comment was supported by the example of EMC criteria's.

SIEMENS observed that in individual class rules tests are independent of the devices and that test descriptions are separate.

FUA 6: Take the grouping proposal by Siemens into consideration (MR Group)

Any Other Industry Comments

Brunvoll raised the question whether Material is subject to MR. The MR Group replied that Material is not yet addressed. System consists of sub-systems and material. The MR Group reiterated their position.

Brunvoll further observed that TRs seem to be very prescriptive and inquired whether the MR Group has considered to make them function/goal based. It was explained that the most stringent standards have to be used, which is prescriptive.

To Brunvoll it appears that there may be a challenge with regard to transpareny of the PEP Model. The MR Group explained that the TRM 2018 is the first time to publish the the PEP and that the MR Group is grateful for any comments. The MR Group notified the participants that there will be an industry consultation phase on the PEP and offered to clarify any questions also individually, if approached.

Kongsberg commented on the harmonisation of EMC testing requirements with applicable international standards for similar products.

FUA 7: Take the EMC proposal by Kongsberg into consideration (MR Group)

Kongsberg inquired about global acceptance of MR TAC, reiterating that 85% of the world fleet is flying under non-EU flags. Due to the lack of global acceptance, Kongsberg observe insecurity for suppliers.

The MR Group explained that MR is subject to flag state sovereignty in non-EU flag states (Recital 25) and that this question could be raised to DG MOVE.

Reference was made to the factual report summarizing the arguments given at the EU RO MR Workshop, 5th September 2018, which can be found on www.euromr.org.

In this context it was also mentioned that in 2009, reduction of trade barriers was one of the aims of Art 10(1), but that no impact analyses have been exercised.

Kongsberg further asked the MR Group to counteract arguments that doubt the quality of MR TACs, as they should have the same quality, globally. It was clarified that TRs respect the most rigourous standards. They suggested that this could be better displayed on the MR TAC with a respective remark on the certificate.

FUA 8: Revisit the minimum contents on the MR TAC (MR Group)

The representative of the Society of Maritime Industries/UK inquired whether the MR Group has benchmarked the timing of the MR process.

It was explained that the MR TR process follows a strict milestone process. Regarding the turnaround time for certification, it was mentioned that individual class societies do have respective KPIs.

Conclusions

The MR TRM 2018 covered a wide range of issues related to

- the status of the product evaluation process (PEP Model)
- the MR TR development process
- the MR TR maintenance process
- the processes to maintain certification integrity under MR

and how to handle specific topics as raised by industry representatives.

The MR Group thanked all participants for their engagement, the valuable contributions and the fruitful discussions. It was concluded that the TRM fulfilled the aim to inform about the latest status and to share ideas and proposals to enhance the processes.

Action List - Technical Review Meeting, 29 November 2018, Hamburg

Actions for EU RO Group:

No.	Issues Raised
1.	Establish a respective position (MR Group)
2.	Address how to handle software in the MR scheme (MR Group)
3.	Update the PEP model, and – upon approval - present it to the industry for consideration (industry consultation) (MR Group)
4.	Further work on this test case in cooperation with Danfoss (Technical Committee)
5.	Justification Letter will be sent in reply to the input by IEC Standards Committee during the industry consultation phase of Tier 7, SIEMENS reading in copy (Secretariat)
6.	Take the grouping proposal by Siemens into consideration (MR Group)
7.	Take the EMC proposal by Kongsberg into consideration (MR Group)
8.	Revisit the minimum contents on the MR TAC (MR Group)

Actions for Industry Associations:

No.	Issues Raised

Appendices

Appendix A: List of TRM Participants

Participants

EU RO MR Group

EU RO MR TC CHAIR (LR) EU RO MR Secretary EU RO MR Secretariat

ABS SC Member

BV TC Member CCS SC Member CRS TC Member DNV GL TC Member IRS TC Member KR TC Member LR SC Member NKK TC Member PRS TC Member RINA TC Member RS TC Member

Industry

Brunvoll AS Danish Maritime (DM) Eaton VSM Schneider Electic Kongsberg Maritime ASA Federation of Norwegian Industries Rolls Royce Marine AS SEA Europe Siemens AG Danfoss Drives A/S Danfoss Drives A/S Society of Maritime Industries/UK Netherlands Maritime Technology

Appendix B: MR TRM Agenda

Meeting Type: 4th Industry Technical Review Meeting Location: Hamburg, The Madison Hotel Date: Thursday, 29 November 2018 Start Time: 10h00 (local time)

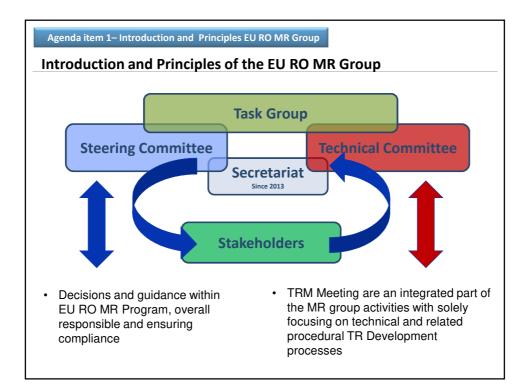
AGENDA

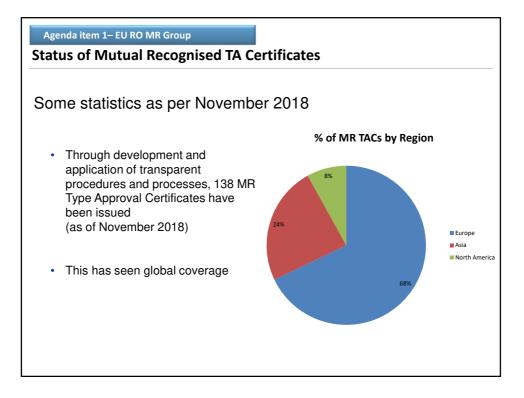
Time	Item	Presenters
10:00	 Introductions and welcome address from: a. EU RO MR Group; b. Relevant industry participants; 	Moderator (LR) TC Chair (LR) Relevant industry participants
10:30	2. Product Evaluation Process (PEP)	Lead AdHoc Group Risk2 (ABS)
12:00	Lunch	
13:00	 Update on TC activities: a. TR Development (Tier 7 industry consultation) b. TR Maintenance 	TC Chair (LR)
14:00	4. Feedback by industrya. Maintenanceb. Development	Relevant industry participants
15:00-15:30	5. Summary of discussions, review of actions and meeting close	TC Chair (LR)

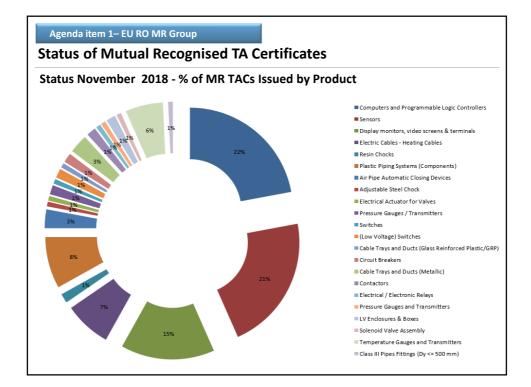
Appendix C: EU RO MR Group Presentations

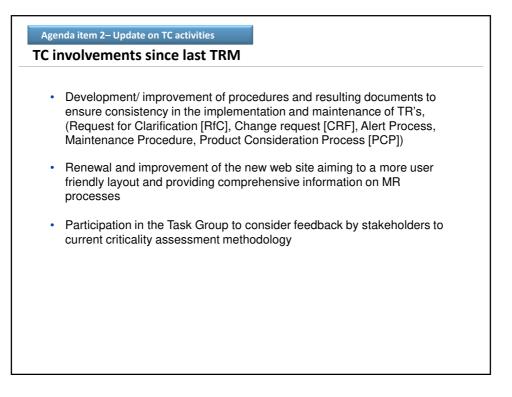


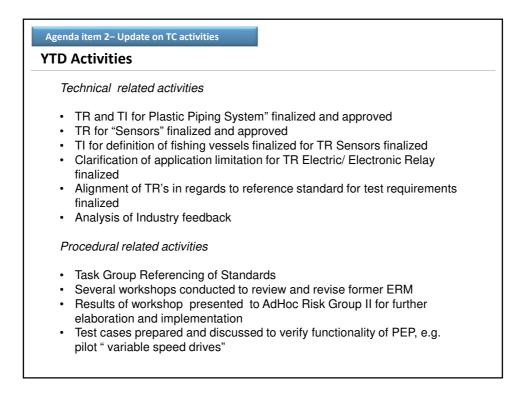
Time	Item	Presenters
10:00	1. Introductions and welcome address from principles and scope of TRM	Moderator (LR) TC Chair (LR) Relevant industry participants
10:30	 Update on TC activities TR Development (Tier 7 industry consultation) TR Maintenance 	TC Chair (LR)
	3. Safety Criticality Product Evaluation Process (PEP)	Lead AHG Risk2 (ABS)
12:00	Lunch	
13:00	 4. Feedback by industry a. Maintenance b. Development 	Relevant industry participants
14:45 – 15:30	5. Summary of discussions, review of actions and meeting close	TC Chair (LR)

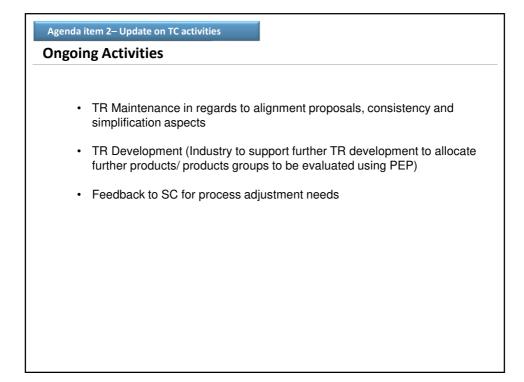


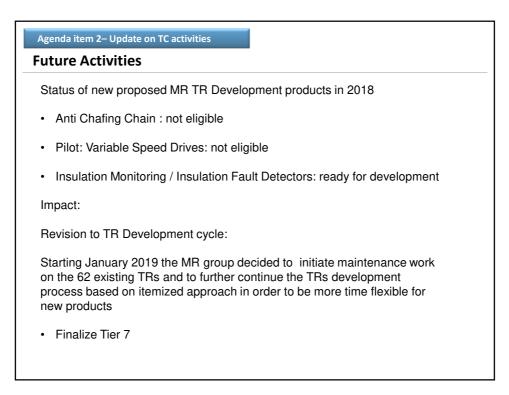






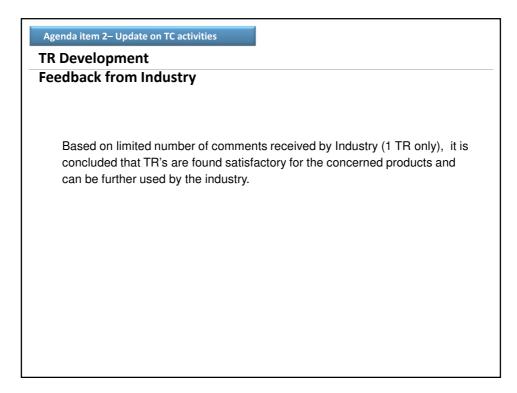


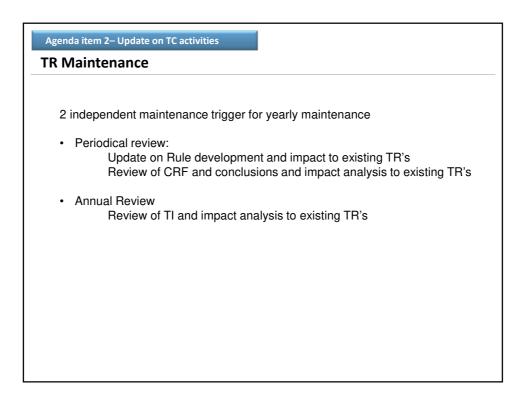


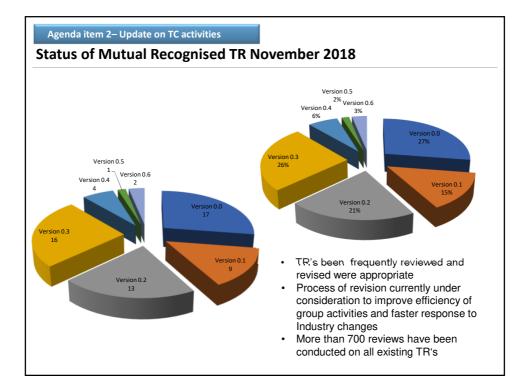


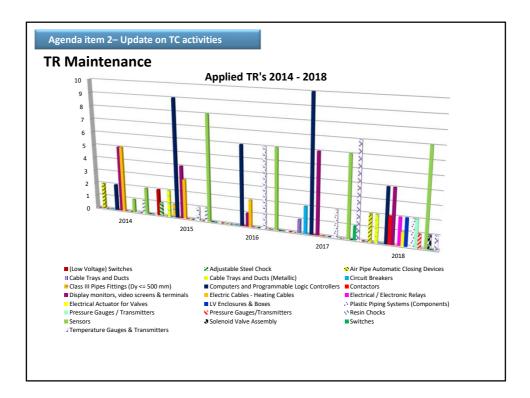
Tier 7 Technical Requirement	Industry Consultation Phase
Differential Pressure Switches	
Dual Temperature and Pressure Switches	
Flow Switches	
Level Switches	
Position Switches	IEC Standards Committee
Pressure Relief Valves in Level III Piping Systems	
Pressure Switches	
Temperature Switches	

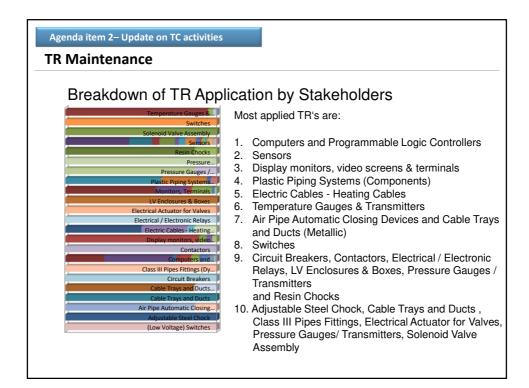
Agenda iten	n 2– Update on TC activities
	k from Industry
Industr	y feedback in regards to Tier 7 development are related to:
•	application limitations in regards to voltage ranges according applicable IEC standard
•	type testing requirements in regards to EMC criteria's if applicable
•	general comment on combining similar products into one TR
•	general comment on harmonising technical documentation for similar products

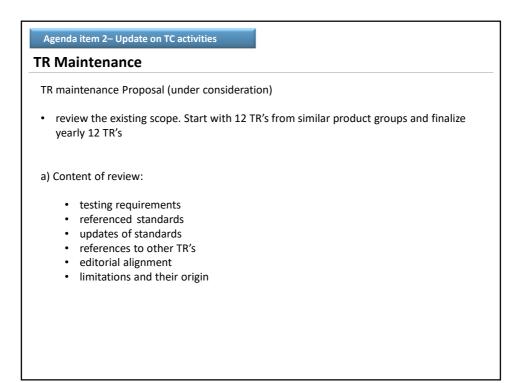








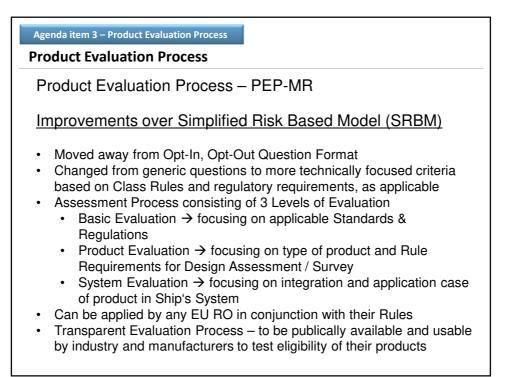




Agenda item 2– Update on TC activities R Maintenance	
TR maintenance Proposal (under considerati	ion)
b) Approach:	
 Compile similar products from their prostandards for all exiting TR's to select 1 Mapping of design requirements Mapping of test requirements Elaborate references to other TR's Elaborate limitations Agree text modules for product description 	

Agenda item 2– Update on TC activities	
TR Maintenance	
TR maintenance Proposal (under consideration)	
Possible product groups	
Electronic equipment (Computers, PLC, Monitors Touch Screens, Electronic Relays, Actuator) Measuring equipment (Gauges, Sensors) Electrical power equipment (Switches, CB, Contactors, Battery Charger) Control elements (Pilot devices, Sensors, Contactors, Actuator Valves Piping Systems Cables	

Agenda item 3 – Product Evaluation Process Product Evalutation Process Development Steps
Product Evaluation Process – PEP-MR
Developments:
 Existing Methodology for Safety Criticality Assessment under review since 2017 PEP-MR methodology developed to follow requests from stakeholders to focus more on technical aspects of eligibility assessment: April – October 2018 Initial Group approval granted Oct 2018, including following documents: PEP-MR Revised Definitions as applicable to the model Transmitted to TC for evaluation & testing with product test cases PEP-MR introduced to industry representatives during the TRM meeting Guiding Questions / Instructions under development to assist with the implementation and future application the process

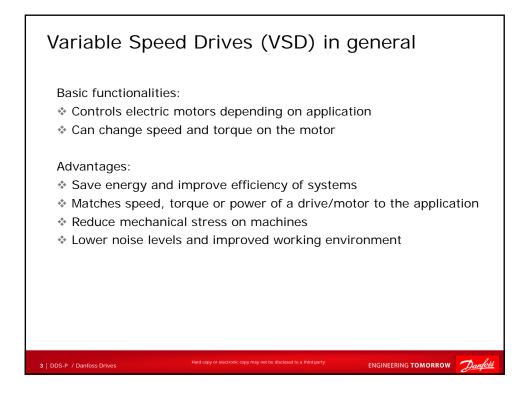




Appendix D: Industry Presentations



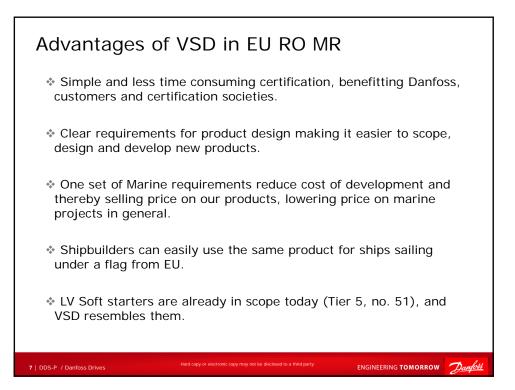


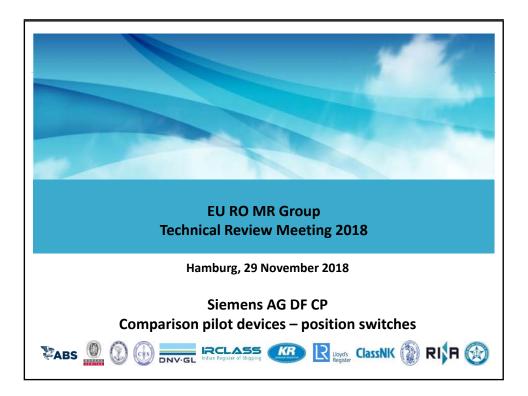






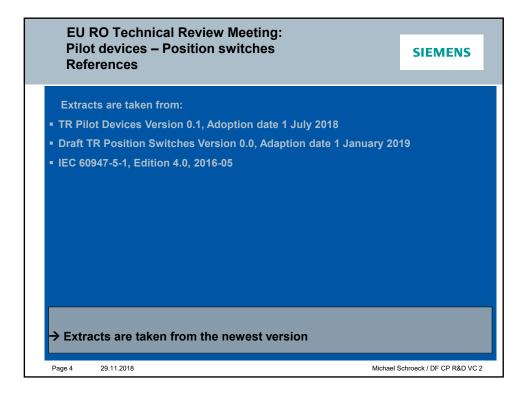


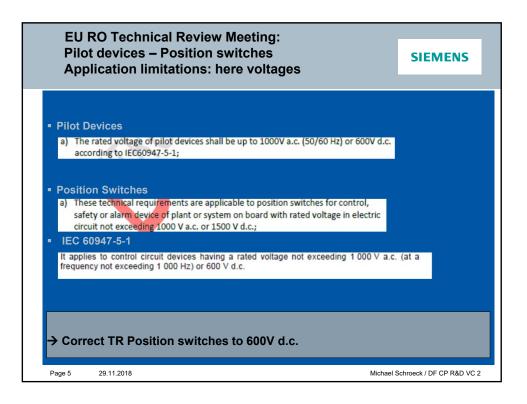


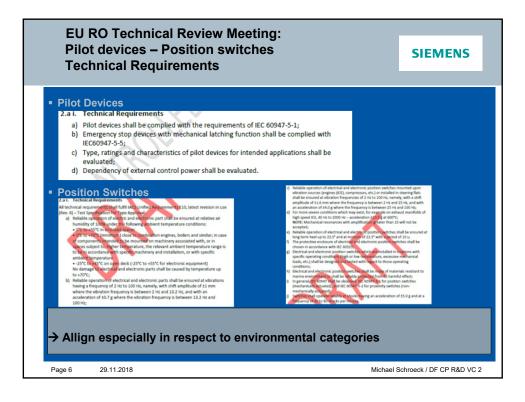


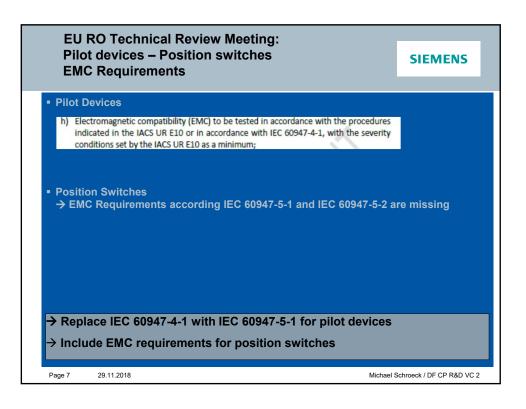


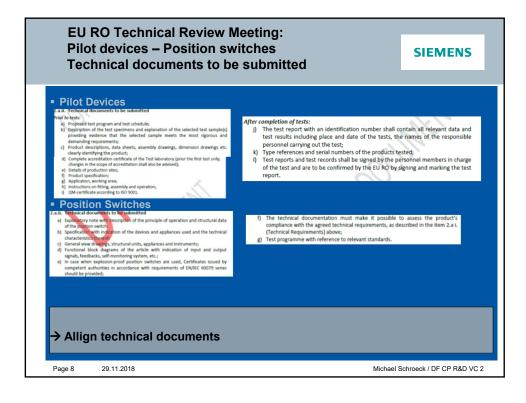
EU RO Technical Review Meeting:	Tier 5	SIEMENS
	 References Application limits Technical requirement EMC Technical Document Summary 	6
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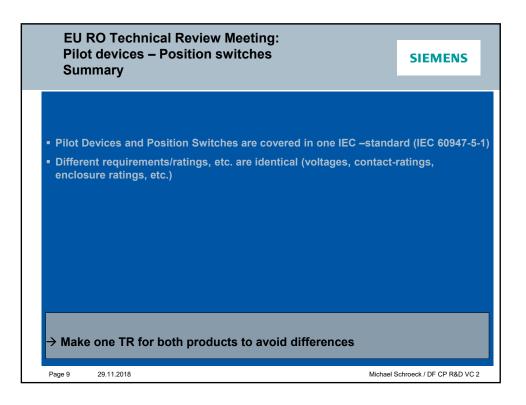












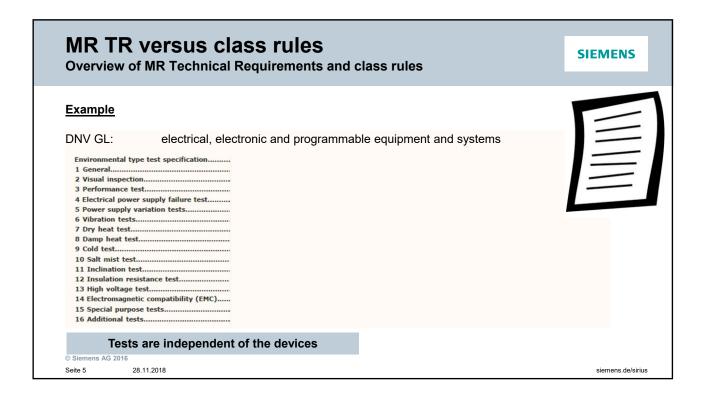


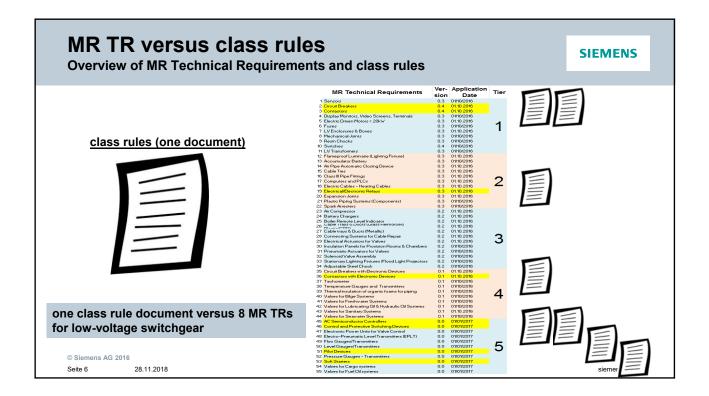




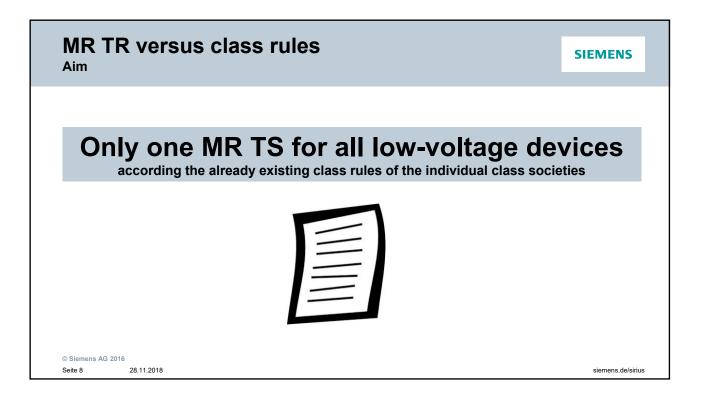
MR TR versus class	rules	SIEMENS Ingenuity for life
	 Overview MR TR and class rules 	3
	 Disadvantage of current approach 	6
. 2	• Aim	7
We live SIRIUS! M We live SIR	 Location/Environmental Classes/Categories 	8
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Class rules	(one document)	
BV:	Automation	
ABS:	electrical equipment	
CCS:	electrical installations	
DNV GL:	electrical, electronic and programmable equipment and systems	
LR:	Electrical Equipment, Control and Monitoring Equipment, Instrumentation and Internal Communication Equipment, Programmable Electronic Systems	
MRS:	Electrical equipment	
NK:	Control and Instrumentation equipment and electrical installations	
RINA:	Automation	
	Control and Instrumentation equipment and electrical installations	





MR TR versus class rules Disadvantage of different MR TRs	SIEMENS
Disadvantage of different MR TRs	
 Effort to maintain the regulations is higher Formal differences (no technical need) will appear Surveyor has to be familiar with different TRs 	
The reduction of different MR TRs to one document will avoid effort and confusion	
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MR TR versus class rules Location/Environmental Classes/Categories

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Extract from DNVGL-CG-0339:

Column I		Column II							
		Main areas on board							
Parameters	Location within main area	Machinery spaces	Control room, accommodation	Bridge	Pump room, holds, rooms with no heating	Open deck			
Temperature	Inside cubicles, desks, consoles, etc. with temperature rise of 5°C or more	8	8	в	D	D			
	All other locations	A	A	A	с	D			
magnetic	Locations where special precautions are taken to avoid condensation	A		*	A	A			
	All other locations	B	r Control noom, accommodation Bridge Pump room, holds, nooms B B D A A C	B					
Vibration	On machinery such as internal combustion engines, compressors, pumps, including piping on such machinery	в	-		в	в			
	Masts	-	-	-	-	с			
	All other locations	A	A	A	A	A			
EMC electro- magnetic compatibility	All locations within specified main areas					в			
	Submerged application	D	-	-	D	D			
Enclosure	Below floor plates in engine room	c	-	2.00	-	-			
	All other locations	8	A	A	8	с			

Extract from LR Test Specification Number 1:

ey.	Description	Ambient temperature range		ature range	Test	Environmental Category					
	Controlled environments	to Producer's specification			lest	ENV1	ENV2	ENV3	ENV4	ENVS	
	Enclosed spaces subject to temperature, humidity and vibration	+5*C	50	+55*C	Visual inspection	х	х	х	х	Х	
	Enclosed spaces subject to generated heat from other equipment	+5*C	to	+70*C	Performance	Х	Х	Х	х	Х	
_	Mounted on redprocating machinery	+5*C	to	+55°C	Pressure	х	х	Х	Х	Х	
_	Open dedis	-25*C	to	+70°C	Insulation resistance	х	х	Х	Х	Х	
					Power supply variation	Х	Х	Х	Х	Х	
					Power supply failure	х	х	х	х	х	
					Inclination	х	х	х	х	X	
					Vibration: Test 1	х	х	х		х	
					Vibration: Test 2				х		
					Humidity: Test 1		х	х	х	x	
					Humidity: Test 2	х					
					Salt mist					X	
					Dry heat			Х		X	
					Low temperature	Х	Х	Х	х	X	
					High voltage	Х	Х	Х	х	X	
					Enclosure					X	
					Electromagnetic compatibility tests for equipment incorporating active electronic components	х	х	x	х	x	

MR TR versus class rules SIEMENS Location/Environmental Classes/Categories Extract from RINA Rules Part C: Extract from EU RO MR TR-Draft Position Switches: For severe vibration conditions such as, e. g., on (a) Reliable operation of electric and electronic part shall be ensured at relative air Reliable operation of electric and electronic part shall be ensured at relative air humidity of 100% under the following ambient temperature conditions: • 0°C to 455°C in enclosed spaces. • 0°C to 470°C (minimum) close to combustion engines, boilers and similar; in case of component intended to be mounteed on machinery associated with, or in spaces subject to, higher temperature, the relevant ambient temperature range is to be in accordance with specific machinery and installation, or with specific ambient temperature. • .25°C to .43°C on open deck (.25°C to +55°C for electronic equipment) No damage to electrical and electronic parts shall be caused by temperature up to 70°C; diesel engines, air compressors, etc.: to +70°C; Requirements could be also in the Technical requirements/Rules itself → Check all the Technical requirements, like for pilot devices © Siemens AG 2016 Seite 10 28.11.2018 siemens.de/sirius

Table 1.1.1

Category

ENV3

MR Technical requirements versus RO rules Contact

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