

19th April 2021

**SGS Baseefa Project Number: 20/0542**

Dear Ms Wells,

**RE: Fortress Interlocks Ltd ~ Range of Hand Operated Products  
Type: Fortress' EXP Interlock Products**

The Fortress' EXP Interlock Products, as listed in the tables below, were referred to SGS Baseefa for an opinion as to whether or not the products fell within the scope of:

- ~ ATEX Directive 2014/34/EU.
- ~ Equipment and Protective Systems Intended for Use in Potentially Explosive Atmospheres Regulations 2016, UKSI 2016:1107 (as amended).

**Full Non-Electrical Alfred Products:**

Alfred Products	Part Number	Description	Drawing Ref.
<b>Mechanical Guard Locks</b>	EXP z x	Mechanical only Guard Lock with Mechanical Head and Actuator and up to three trapped Keys.	AD-00076, Issue 0-B, Date 23-03-21
<b>Mechanical Key Exchanges</b>	EXP z x	Interlocking Key Exchange with up to five trapped Keys.	AD-00078, Issue 0-C, Date 08-04-21
<b>Mechanical Bolt Interlock</b>	EXPBMS z x	Mechanical Bolt Module with up to five trapped Keys.	AD-00077, Issue 0-C, Date 08-04-21

Where; **z** = Mechanical modules from Fortress Alfred product range. **x** = Optional mounting plate assembly.  
Note, all Alfred products will include the part numbering prefix **EXP**.

**Standalone Non-Electrical Sub-Assembly Modules:**

Alfred Sub-Assembly Module type	Description / Model Numbers	Drawing Ref.
<b>Alfred standalone Actuator assemblies</b>	Tongue Actuators; EXPTA Slidebar Actuators; EXPTN , EXPTS , EXPTF , EXPTI Hinged Handle Actuators; EXPHL1 Sprung Hand operated Actuator; EXPSPD	AD-00086, Issue 0-C, Date 08-04-21

Additional Sub-Assembly Modules outside of marketed Alfred product range	Description / Model Numbers	Drawing Ref.
<b>amGardpro Actuators</b>	Tongue Actuators; TA , TK , SA Handle Actuators; EH , EF , MA , MI Handle Actuators with intuitive Escape Release; EI , EJ Slidebar Actuators; TG , SN , SS , SF , SI Hinged Handle Actuators; HS1	AD-00088, Issue 0-C, Date 08-04-21
<b>amGardpro Head Modules</b>	Tongue actuated Mazak Heads; T6 , T7 , T8 Rotary action Mazak Heads; M6 , M7 , M8 Escape Release Mazak Heads; I6 , I7 , A6 , A7	
<b>amGardpro Key Adaptor Modules</b>	Mazak Extracted Key Adaptors; EKL* , EKR* Mazak Safety Key Adaptors; SKL** , SKR** Mazak Access Key Adaptors; AKL** , AKR**	
<b>amGardpro Escape Release Module</b>	Mazak Push action Escape Release Adaptor; R1 , R2 , R3 , R4 , R6 , R7 , R8 , R9 , RW , RX , RY , RZ	

**For Clarification:**

Article 2 Paragraph (1) of the ATEX Product Directive 2014/34/EU and also UKSI 2016:1107 (as amended), confirms that the scope is limited to 'equipment', defined as "machines, apparatus, fixed or mobile devices, control components and instrumentation thereof and detection or prevention systems which, separately or jointly, are intended for the generation, transfer, storage, measurement, control and conversion of energy or the processing of material and which are capable of causing an explosion through their own potential sources of ignition".

**SGS Baseefa Review:**

The drawings submitted by Fortress Interlocks Ltd for the hand operated products listed in the table on page 1, have been reviewed by SGS Baseefa.

The Fortress Interlocks Ltd hand operated products, type **Fortress' EXP Interlock Products**, as listed in the tables on page 1, are manufactured in stainless steel as standard with the option of Zinc Alloy AG40A (Zamak 3 (Mazak)), and the 'Red Escape Release Handle of the E\* Actuator Assembly' is manufactured in Aluminium with a non-metallic powder coating of 0.2mm thickness.

The products have been assessed against the scope of European Union Directive 2014/34/EU of 26 February 2014 and have been found to be excluded from the scope of the directive.

The products have also been assessed against the scope of the Equipment and Protective Systems Intended for Use in Potentially Explosive Atmospheres Regulations 2016, UKSI 2016:1107 (as amended), and have been found to be excluded from the scope of the UK Regulations.

Noting that the range of door locks do incorporate very small stainless-steel springs to aid positioning/alignment of internal parts. However, these springs have very low stored energy values of 2.3374J or considerably less, hence they are not deemed to be a potential ignition risk for gas or dust applications.

The ATEX Product Directive 2014/34/EU Guidelines provide further clarification on products deemed out of scope of the directive. Article 38 of the guidelines (available at the link below) specifically states that '**equipment moved only by human power**' is outside the scope of Directive 2014/34/EU. At the time of this letter being issued, the UK Government has not yet issued equivalent Guidelines, therefore the UK Approved Bodies Group has agreed to use the ATEX guidelines until such time that UK Guidelines are published.

If there are potential ignition risks from electrostatic discharge, related to the potential manner of use of the product or due to the choice of non-metallic materials for items such as knobs/handles/coatings, the European Commission and UK Government have given guidance that where a risk is solely related to an electrostatic discharge which may occur as a function of the use of the equipment this does not bring the equipment in scope.

The end user shall control the risk of potential ignitions that may arise due to static electricity.

The latest advice as affirmed by the UK Department of Business, Energy & Industrial Strategy (BEIS) is that such equipment should not be considered to fall under the ATEX Directive 2014/34/EU or the UKSI 2016:1107 (as amended) and hence shall not carry any ATEX marking or UKEX marking.

### **Safe Use in Potentially Explosive Atmospheres:**

The Fortress Interlocks Ltd, hand operated products, type Fortress' EXP Interlock Products, as list in the Tables on page 1, are suitable for use in Potentially Explosive Atmospheres.

Noting that it is the end users' responsibility to conduct a risk assessment to determine if the door/gate/panel system to which the Fortress Interlock Ltd product is mounted, are likely to incorporate any potential ignition risks in functionality. The risk assessment should be conducted in accordance with the ATEX Workplace Directive 1999/92/EC and UK Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) ~ UK SI 2002:2776 & N.Ireland SR 2003:152.

### **Reference Documents:**

The ATEX Product Directive 2014/34/EU & associated guidelines and the ATEX Workplace Directive 1999/92/EC & associated guidelines, are available at:

<https://ec.europa.eu/growth/sectors/mechanical-engineering/atex/>

The Equipment and Protective Systems Intended for Use in Potentially Explosive Atmospheres Regulations 2016, UKSI 2016:1107 (as amended ~ see UKSI 2019:696), are available at:

<https://www.legislation.gov.uk/uksi>

The UK Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) ~ UK SI 2002:2776 & N.Ireland SR 2003:152, are available at:

<https://www.legislation.gov.uk/uksi>

You may also wish to refer to the following guide:

PD CLC/TR 60079-32-1: 2018 ~ Explosive atmospheres. Electrostatic hazards, guidance.

Yours sincerely



Louise Brearley  
Certification Engineer