

MARK INTEGRITY PROGRAM

Variation Notice and Corrective Action Requirements for US/Canada Safety Certifications

We define minimum requirements for actions by manufacturers in response to a variation notice for nonconformances to the requirements. This document applies to all customers of our product certification services for the U.S. and Canadian markets, i.e., for US/Canada Safety Certifications.

Why this requirement is important

A key element in determining ongoing compliance with the requirements is the periodic Follow-Up Services factory visits by our field engineer. These visits are one method of verifying that the processes and systems in place at a manufacturing facility are effective in meeting requirements. When a nonconformance is found in the field or during a Follow-Up Services visit at the factory, it is important for a manufacturer to address not only the product nonconformance, but also any underlying process or system issue that may have led to the nonconformance. Appropriate containment and system-level corrective action are necessary to help assure that all products bearing the UL Mark comply with the requirements, and that action is taken to reduce the likelihood of the same nonconformance from recurring.

Requirements

It is the manufacturer's and applicant's responsibility to assure that all product with a UL Certification Mark is in compliance with the applicable UL Solutions requirements. When a product does not comply with the Follow-Up Service Procedure, applicable standard or other UL Solutions requirements, our field engineer documents the nonconformance on a variation notice (VN) as a record of the nonconformance. The variation notice contains the disposition of the nonconformance and action required by the manufacturer or applicant when procedure changes are required.

Actions to be taken by a manufacturer in response to a variation notice

When a variation notice is issued, a manufacturer may have three options for handling nonconforming UL Marked products as defined in the Variation Notice (VN) Disposition.

1. Do not continue to use the UL Certification Mark with current construction. Rework or modify all nonconforming UL Marked products to bring them into compliance with the Follow-Up Service Procedure.
2. Scrap and/or remove any markings on the product referring to UL Solutions, or obliterate these markings if the marking is imprinted, die-stamped, molded, etc.
3. Contact our customer service and submit the variation as an alternate construction. This action requires involvement of the Applicant. If you choose to ship product during the review period, you do so at your own risk. UL Solutions will not be liable for any claims, losses, expenses, or damages arising out of or relating to the use of the product by any third party and/or any non-conformance of the product with the applicable UL Solutions requirements.

In addition to any option above, a manufacturer should also investigate the root cause of a variation notice and take action to prevent a nonconformance from recurring. Examples of such actions include providing additional training, revising work instructions, providing job aids, revising engineering change and procurement processes, etc.

For more information, please contact your local engineer.



While a formal written corrective action plan is not required, resolution for each variation noted, will be expected and verified prior to or during future visits. Failure to take appropriate action to resolve the variation notice may result in an additional variation notice, activation of the Customer Corrective Action Process, or an interruption in UL Solutions authorization to use UL Certification Marks on products.

Applicant notification

It is the manufacturer's responsibility to notify the applicant of any variations identified by us. In addition our field engineer will make every effort to provide a copy of the variation to the applicant (if different from the manufacturer). Variation notices are also available to both manufacturers and applicants at the my.ul.com.

Questions

For questions or concerns on the content or interpretation of documents issued as a result of an inspection visit, please contact your local field engineer or the field engineer's manager. This is the fastest way to clarify any questions.

For more information, please contact your local engineer.



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