



## MARK INTEGRITY PROGRAM

# UL Mark Surveillance Requirements

UL defines responsibilities, duties and requirements for both manufacturers and UL representatives involved with Follow-Up Services inspection programs associated with UL/C-UL/ULC Mark product certification programs.

This document applies to all customers participating in UL/C-UL/ULC Mark product certification programs also referred to as UL certification Mark programs. The requirements described in this document are based on terms and conditions covering UL's delivery of services located at [ul.com/contracts](http://ul.com/contracts) and reflect UL's long-standing Follow-Up Services inspection program requirements for the UL certification Mark programs.

Unless expressly authorized in writing by UL and not otherwise publicly available, the manufacturer shall not disclose or distribute any of UL's requirement documents or their content to any third party or use them for any purpose other than for UL certification and/or Follow-Up Service.

UL shall not incur any obligation or liability for any loss, expense or damages, including incidental, consequential or punitive damages, arising out of or in connection with the use or reliance upon the contents of this document to anyone other than UL's customer as provided in the agreement between UL and customer.

### Why these requirements are important

UL's Follow-Up Services program is fundamental to the integrity of UL's certification Marks. For a product to bear a UL certification Mark, it must comply with applicable UL requirements. Through contractual agreement, a manufacturer may apply UL certification Marks *only* to products complying with applicable UL requirements. A manufacturer is responsible for maintaining continued and ongoing compliance with all applicable UL requirements during the production of products intended to bear a UL certification Mark. Under the UL Follow-Up Services program, UL regularly visits locations

where UL certified products are manufactured to countercheck, through on-site surveillance, that manufacturers maintain adequate production controls and have an effective quality system in place. At a minimum, a manufacturer's quality system must address the following elements to the extent necessary to maintain compliance with UL requirements:

- Product assurance
- Inspection and test
- Documentation
- Calibration
- Material control such as procurement, verification and handling
- Nonconformance resolution and corrective action
- Control of the UL Mark
- Records
- Other processes necessary to assure compliance with UL requirements

To help achieve consistent and ongoing compliance, manufacturers must be aware of current requirements as documented in UL's Follow-Up Services Procedures, applicable standards and other UL Follow-Up Services program publications.

UL partners with its customers for a common objective: to see that only those products in full compliance with applicable UL requirements carry the UL Mark.

## Applicable documents

Product-specific technical requirements are included and defined in a number of source documents, including UL Standards as well as the standards of other organizations such as ASTM, ANSI, etc. UL further includes and defines product-specific and technical requirements in UL Follow-Up Services Procedures and related documents such as Standardized Appendix Pages, Special Appendix Pages and Follow-Up Inspection Instructions. The general requirements defined in this UL Mark surveillance requirements document supersede any similar requirements defined in individual Follow-Up Services Procedures.

Manufacturers are encouraged to familiarize themselves with “FUStart: Preparing for Your Follow-Up Services Inspections.” This valuable resource introduces customers to UL’s Follow-Up Services program and helps manufacturers understand their role and responsibilities regarding UL’s Follow-Up Services. FUStart is available on UL’s Web site at [ul.com/fustart](http://ul.com/fustart).

## General responsibilities and duties of UL’s field representatives

Throughout the lifetime of the UL certification, products and production processes are subject to on-site surveillance to determine continued compliance with requirements. UL field representatives conduct these visits at a frequency appropriate for the UL certified product or system. UL field representatives function as auditors to countercheck production and system controls that enable a manufacturer to continue to produce product complying with UL requirements.

A UL field representative’s responsibilities and duties encompass a variety of activities, including:

- Examining the construction of product bearing, or intended to bear, UL certification Marks or markings to determine compliance with the product description and any other requirements defined in a Follow-Up Service Procedure and related documents
- When required, selecting samples for follow-up tests at a UL laboratory. Unless specifically directed otherwise,

packaging and shipment of samples are the responsibility of a manufacturer.

- During a typical visit, auditing a manufacturer’s test records and facilities to determine that:
  - Proper number of samples is undergoing required tests
  - Required tests are being performed correctly and appropriate records are maintained
  - Proper information is being recorded and is up-to-date
  - Instruments used for tests have been calibrated at prescribed intervals and are in good working order
- The UL field representatives may witness tests conducted by the manufacturer.
- At each visit to the factory, determining the available production bearing or intended to bear the UL Mark and selecting representative samples at random for inspection. The samples are examined in accordance with instructions in the Follow-Up Service Procedure, applicable standards and related requirements documents.
- Documenting any nonconformance by means of a variation notice. Please see UL Variation Notice and Corrective Action Requirements: UL/C-UL/ULC Mark Follow-Up Services at [ul.com/fus](http://ul.com/fus) for more information.

## Manufacturer responsibilities for compliance with UL requirements

A manufacturer is responsible for complying with all applicable UL requirements. In accordance with the appropriate UL agreement, a manufacturer must verify compliance with applicable requirements defined in the Follow-Up Service Procedure and related documents.

## UL requirements documents

A manufacturer is responsible for maintaining current versions of UL requirement documents. Applicable UL requirements can be found in Follow-Up Services Procedures; Standardized Appendix Pages; Special Appendix Pages; Follow-Up Inspection

Instructions; UL Standards for Safety; UL Subscriber Bulletins; this reference document; MyHome @UL, UL's secure customer portal; and UL's Web site at UL.com. UL product certification customers can access UL and ULC Standards for Safety at ULStandards.com.

When UL Standards for Safety are referenced in or used as part of the Follow-Up Services Procedure or related documents, manufacturers must maintain current versions of these inspection-use UL Standards.

UL strives to partner with manufacturers in documenting accurate requirements. A manufacturer should also ensure that construction details and other product specific information described in Follow-Up Services Procedures, Standardized Appendix Pages, and Follow-Up Inspection Instructions are accurate. If a manufacturer has any concerns about accuracy and clarity of requirements, please contact your local field representative.

## Control of the UL Mark

Manufacturers must control their use of the UL Mark. UL Marks may reference UL either directly by use of the name, an abbreviation of it, or the UL symbol or Recognized Component Mark, or indirectly by means of agreed-upon markings that are understood to indicate certification by UL. Manufacturers must have effective processes that ensure the UL Mark is associated *only* with products demonstrating full compliance with all UL requirements. In addition, manufacturers must assure no reference is made to UL certification for products that are not authorized or do not fully comply with UL requirements. This includes references used on advertising materials, web sites, e-mails, promotional and tradeshow products or any other form of marketing material. Use of the UL Mark is further limited by agreements that have been executed by a manufacturer and UL.

The UL Mark must contain all required information and shall be legible on a product. Some products and certification programs allow alternate marking methods. Please refer to the Follow-Up Services Procedure and related documentation for specific marking requirements.

Manufacturers shall not ship loose UL labels, i.e., labels that have not been affixed to a product or packaging, to any other location unless specifically authorized to do so by UL.

Pressure sensitive labels that are procured directly from UL have a 3 year expiration date. Manufacturers should have an inventory control system that ensures labels will not be utilized past this expiration date.

## Access to factory and products

During the hours a factory is in operation, a manufacturer must provide UL field representatives with unannounced and immediate access to any portion of the premises where UL certified product or components are being fabricated, processed, finished or stored, and to test areas for any testing required by a Follow-Up Services Procedure. UL field representatives shall be permitted to inspect and witness prescribed tests on any product bearing or intended to bear markings referencing UL prior to shipment.

## Product disassembly

A manufacturer is responsible for any product disassembly required for an inspection by a UL field representative. If agreed to by a manufacturer, a UL field representative may optionally disassemble a product if this will make an inspection visit more efficient and effective. In either case, a manufacturer is responsible for any reassembly of a product.

## Follow-Up Testing Sample selection

When follow-up tests are required, a UL field representative will select samples. If the testing is to be done at a UL test laboratory and there are no special sample preparations, a manufacturer will forward samples to the UL test laboratory specified by the UL representative within five business days of an inspection visit. When sample preparation must meet special requirements, a manufacturer is responsible for sending samples to UL in a timely manner, i.e., typically within 30 calendar days of an inspection visit. Unless specifically instructed otherwise, packaging and shipment of samples are the responsibility of a manufacturer.

## Inspections and tests

A manufacturer is responsible for conducting inspections and tests required by the applicable standard or the UL Follow-Up Services Procedure and related documents at the required frequency and conditions.

## Inspection, measuring and test equipment, facilities, and personnel

A manufacturer shall use inspection, measuring and test equipment capable of the accuracy and precision necessary to ensure compliance with UL requirements.

A manufacturer must provide, at a convenient location, the following resources for all inspections and tests performed at a factory:

- Inspection, measuring and test equipment
- Facilities
- Competent personnel

A manufacturer shall make inspection, measuring and test equipment and related resources available to a UL field representative during inspection visits so inspection work can proceed without undue delay.

## Calibration of inspection, measuring and test equipment

A manufacturer is responsible for assuring that all inspection, measuring and test equipment, including calibration standards, required by a Follow-Up Services Procedure or used by UL field representatives during factory inspections are calibrated in accordance with UL's published calibration requirements. Please see UL Calibration Requirements: Equipment Used for UL/C-UL/ULC Mark Follow-Up Services at [ul.com/fus](http://ul.com/fus) for more information.

## Required records control

A manufacturer is required to establish a process for control of records and to identify records of inspections and test

performance as applicable. Unless indicated otherwise in a Follow-Up Services Procedure, manufacturers are to record the product model or catalog number, product identification, inspection and/or test conducted, date, and results.

## Record retrieval/access

A manufacturer shall be able to readily retrieve any records that demonstrate compliance to UL requirements and provide a UL field representative access to all applicable records.

## Record retention

The retention period for records that demonstrate a manufacturer's compliance to UL requirements is a minimum of six months from the date a record was created, unless otherwise indicated.

## Records for 100 percent inspections or 100 percent tests

The record for a specific lot or group of products may consist only of a statement, without specific details, that an entire lot or group was tested and found acceptable. If a manufacturer has implemented an auditable system to confirm that production is always subjected to the required tests, it is not necessary to keep complete test records when 100 percent of production is tested. Instead, manufacturers are to retain exception reports indicating noncompliance and corrective actions.

## Bilingual Safety, Warning and Caution Markings for Products Certified for Canada

Products that are intended for sale in Canada and bearing the C-UL or ULC Certification Mark are required to have all Safety, Warning and Caution Markings appear in both English and French Languages. This applies to all required Safety, Warning and Caution Markings specified in the UL Follow-Up Service Procedure. Please see Canadian Certification Requirements for Bilingual Safety, Warning and Caution Markings at [ul.com/fus](http://ul.com/fus) for more information.

## Identifying and resolving nonconformances

When a product inspected by a UL field representative does not comply with the Follow-Up Services Procedure, applicable standard or other UL requirements, a UL field representative documents any nonconformance on a variation notice. Identifying and resolving nonconformances is done in accordance with UL's published requirements. Please see UL Variation Notice and Corrective Action Requirements: UL/C-UL/ULC Mark Follow-Up Services at [ul.com/fus](http://ul.com/fus) for more information.

## Traceability requirements

As part of its Follow-Up Services Procedures, UL defines minimum requirements for materials and components used in UL certified products. It is a manufacturer's responsibility to assure that all components and materials used in UL certified products meet requirements described in UL Follow-Up Services Procedures. A manufacturer must maintain all required records so they are available for review by a UL field representative. For more information about UL's requirements regarding controls for materials and components used in UL certified products, please see UL Traceability Requirements: Material and components used for UL/C-UL/ULC Mark Follow-up Services at [ul.com/fus](http://ul.com/fus).

## Questions, responses and appeals

For questions or concerns about the content or interpretation of documents issued as a result of an inspection visit, please contact the UL field representative or the field representative's supervisor.

A manufacturer should direct responses to variation notices to the appropriate UL representative indicated on the variation notice.

Please contact your UL field representative with requests for additional information and clarification regarding UL's Follow-Up Services related programs, including variation notices. If the field representative is unable to provide the requested information, the field representative will assist you in reaching UL's management team for a response. If you wish to formally appeal a decision or lodge a complaint related to UL's Follow-Up Services or any other UL service, please contact your local UL customer service team.

Manufacturers and applicants may access additional information through **MyHome @UL**, a dedicated Web site providing secure access to UL inspection reports, UL procedures, variation notices, projects tracking information and other online tools created specifically for UL customers that can simplify a manufacturer's compliance activities.

Manufacturers without Internet access may obtain the current version of documents referenced within this document from their local UL customer service representative or UL field representative.