



UL Variation Notice and Corrective Action Requirements: UL/C-UL/ULC Mark Follow-Up Services

UL defines minimum requirements for actions by Manufacturers in response to UL variation notices for nonconformances to UL requirements. This document applies to all customers of UL's product certification services for the U.S. and Canadian markets, i.e., UL/C-UL/ULC Mark certifications.

Why this requirement is important

A key element in determining ongoing compliance with UL requirements is the periodic Follow-Up Services factory visits by UL's 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 assure that all products bearing the UL Mark comply with UL requirements, and that action is taken to reduce the likelihood of the same nonconformance from recurring.

Requirements

It is the Manufacturer's responsibility to assure that all product with a UL Certification Mark is in compliance with the applicable UL requirements. When a product does not comply with the Follow-Up Service Procedure, applicable standard or other UL requirements, UL field engineer document 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 has three options for handling nonconforming UL Marked products.

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, or obliterate these markings if the marking is imprinted, die-stamped, molded, etc.
3. Contact UL's 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 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 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

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change and procurement processes, etc. 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 UL 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 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 UL. In addition the UL field engineer will ASSIST WHERE POSSIBLE, to provide a copy of the variation to the Applicant. In some cases, Manufacturer information is confidential (IPM Procedures is one example) and can not be shared. Variation notices are also available to both Manufacturers and Applicants at UL's customer portal, MyHome@UL. For free access to MyHome@UL, please go to <http://my.home.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 UL field engineer or the field engineer's manager. This is the fastest way to clarify any questions.

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