



MARK INTEGRITY PROGRAM

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 representatives. 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 customer 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

When a product does not comply with the Follow-Up Service Procedure, applicable standard or other UL requirements, UL field representatives document the nonconformance on a variation notice (VN). A variation notice is a channel of communication between UL and a manufacturer and creates a record when nonconformances are discovered.

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. Modify all nonconforming UL Marked products to bring them into compliance with the Follow-Up Service Procedure,
2. Remove any markings on the product referring to UL, or obliterate these markings if the marking is imprinted, die-stamped, molded, etc., or
3. Request temporary acceptance of the revised construction from UL. By informing the field rep, UL will review and determine whether shipment can continue for a limited period of time, or shipment must be discontinued. Regardless of this decision, longer-term authorization to use the UL Mark with a revised construction can only be obtained after an applicant contacts UL Customer Service to request a permanent change in the Follow-Up Services Procedure.

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. While a formal written corrective action plan is not required, a UL field representative will review with a manufacturer the proposed action plan before closing the variation notice. Manufacturers are encouraged to discuss ongoing corrective actions with their field representative, who may be able to provide assistance or share resources available from UL to help implement effective corrective actions.

For more information, please contact your local UL field representative

Applicant notification

A manufacturer is responsible for forwarding a copy of the variation notice to the applicant. In addition, variation notices are 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 representative or the field representative's supervisor. This is the fastest way to clarify any questions.

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