



MARK INTEGRITY PROGRAM

UL Solutions Nonconformance Report and Corrective Action Requirements for US/Canada Safety Certifications

This document defines minimum requirements for actions by manufacturers in response to a nonconformance report. 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 engineering team 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 UL Solutions 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 engineering team documents the nonconformance on a nonconformance report (NCR), previously known as a variation notice (VN), as a record of the nonconformance. The nonconformance report contains the disposition of the nonconformance and action required by the manufacturer and/or applicant.

Actions to be taken by a manufacturer in response to a nonconformance report

When a nonconformance report is issued, a manufacturer may have three options for handling nonconforming UL Marked products as defined in the nonconformance report (NCR) disposition.

- 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 nonconformance 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 nonconformance 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 nonconformance report 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. While a formal written corrective action plan is not required, resolution for each nonconformance noted, will be expected and verified prior to or during future visits. Failure to take appropriate and timely action to resolve the nonconformance report may result in an additional nonconformance report, activation of the customer corrective action process, and 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 nonconformances identified by UL Solutions. In addition, our field engineering team will make every effort to provide a copy of the nonconformance report to the applicant (if different from the manufacturer). Details of the nonconformances Nonconformance reports are also available to both manufacturers and applicants at the myUL®Client Portal.

Questions

For questions or concerns on the content or interpretation of documents issued as a result of an inspection visit, please contact our field engineering team.

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