

Mark Integrity Program

UL Mark Surveillance requirements

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

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 our delivery of services located at ul.com/contracts and reflect our long-standing UL 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 UL 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

Our UL 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 a 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 our UL Follow-Up Services program, our field engineers regularly visit 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 UL requirements, applicable standards and other UL Follow-Up Services program publications.

We work with our 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. We further include and define product-specific and technical requirements in our 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 UL 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 our UL Follow-Up Services program and helps manufacturers understand their role and responsibilities regarding UL Follow-Up Services. FUStart is available on UL’s website at ul.com/fus.

General responsibilities and duties of our field engineers

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

Our field engineer’s responsibilities and duties encompass a variety of activities, including:

- Examining the construction of products bearing, or intended to bear, UL certification Marks or markings to determine compliance with the product description and any other requirements defined in a UL 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 field engineer 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 UL 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 for more information.

Applicant responsibilities for compliance with UL requirements

The applicant is required to provide the manufacturer with the UL certification requirements. This can be accomplished by authorizing the manufacturer’s access to the UL requirements via our secure customer portal [myUL®](#) or by providing to the manufacturer their own requirement documents that contain all the information necessary for full compliance to the UL requirements.

The applicant should also ensure that construction details and other product specific information described in UL Follow-Up Services Procedures, Standardized Appendix Pages, and Follow-Up Inspection Instructions are accurate. If there are any concerns about accuracy and clarity of requirements, please contact your UL project handler or Customer Service at CEC@ul.com or 1-877-ULHelps.

Manufacturer responsibilities for compliance with UL requirements

A manufacturer is responsible for complying with all applicable and current UL requirements. In accordance with the appropriate UL agreement, a manufacturer must verify compliance with applicable requirements defined in the UL Follow-Up Service Procedure and/or requirements documents provided to them by the applicant to enable compliance with the UL Follow-Up Service Procedure and any other related UL requirements.

UL requirements documents

Applicable UL requirements can be found in UL Follow-Up Services Procedures, Standardized Appendix Pages, Special Appendix Pages, Follow-Up Inspection Instructions, UL Standards for Safety, UL Subscriber Bulletins, this reference document, [myUL®](#), and our website 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 UL Follow-Up Services Procedure or related documents, manufacturers must maintain current versions of these inspection-use UL Standards.

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 UL Recognized Component Mark, or indirectly by means of agreed-upon markings that are understood to indicate certification by us (such as recognized company name and model when the RC Mark is optional and this combination is noted in the certification directory – UL Product iQ®, as the marking identifying certification). 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 may require modifications to the model number, type, or other markings used to identify certification, as defined in UL's certification directory, if shipment is to continue of products not in full compliance with UL requirements. This includes references used on advertising materials, websites, emails, 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. Specific marking requirements are defined in the UL Follow-Up Services Procedure and/or the Guide for Printing Legacy, Smart and Enhanced UL Certification Marks at ul.com/fus for more information.

Manufacturers should not ship loose 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. In addition, UL certification Marks shall not be recycled or re-used from other than their original application. For example, the re-use of packaging or containers that contain UL certification Marks, shall not be recycled/reused unless the original certification Marks are removed/destroyed.

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

Manufacturers are responsible for control and inventory of UL Marks. Manufacturers shall have in place a process supported by records to ensure accuracy of UL Mark usage and when applicable production volume reporting.

A UL Certified, Listed, Recognized, or Classified product that has been previously in use and subjected to various degrees of rebuilding, remanufacturing, refurbishing, repairing or reconditioning for resale or reuse is not eligible to have a new certification Mark applied unless a UL certification Mark is authorized for rebuilt/refurbished/remanufactured/reconditioned product and specifically authorized in the UL Follow-Up Service Procedure.

Only products manufactured and shipped after the successful completion of an Initial Production Inspection are eligible to bear a UL certification Mark when constructed as described in the UL Follow-Up Service Procedure.

Access to factory and products

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

Product disassembly

A manufacturer is responsible for any product disassembly required for an inspection by a field engineer. If agreed to by a manufacturer, a field engineer 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 field engineer 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 us 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 field engineer 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 UL Follow-Up Services Procedure or used by field engineers during factory inspections are calibrated in accordance with published calibration requirements. Please see *UL Calibration Requirements: Equipment Used for UL/C-UL/ULC Mark Follow-Up Services* at 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 UL 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 field engineer 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% inspections or 100% 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% of production is tested. Instead, manufacturers are to retain exception reports indicating noncompliance and corrective actions.

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.

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 for more information.

Identifying and resolving nonconformances

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



Traceability requirements

As part of our UL Follow-Up Services Procedures, we define 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 UL requirements. A manufacturer must maintain all required records so they are available for review by a field engineer. For more information about our 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.

OSHA requirements

The United States Occupational Safety and Health Administration, or OSHA, regulates, for safety, certain types of products used in workplaces, requiring them to be certified by a Nationally Recognized Testing Laboratory (NRTL) such as UL. A new OSHA directive (CPL 01-00-004) has been published and includes additional requirements to be reviewed during surveillance when the manufacturer produces certified products that are under the scope of the directive. These are generally products found in the workplace. For manufacturers that have such products the UL factory surveillance shall verify annual that the manufacturer maintains:

- Procedures for control of production, including
 - a) mechanisms to identify batches or production runs,
 - b) procedures to isolate non-conforming products,
 - c) procedures to notify UL of changes to the product, production or management systems that may impact a product's compliance,
 - d) procedures for periodic review and update of master specifications,
 - e) procedures for the retention of production records,
 - f) procedures for the tracking and documentation of product defects, claims and complaints, and
 - g) procedures for controlling incoming materials and components used to make the certified product;
- Adequate separation of duties between quality assurance personnel and production personnel;

- Procedures to conduct periodic quality assurance verification of production runs, including sampling procedures and a requirement for verification inspections and tests to be conducted by individuals who are independent of production (when these tests are separate from the production process); and
- Procedures for production line verifications and tests, when required by UL, using properly calibrated and maintained test equipment that is routinely checked by the manufacturing facility.

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 field engineer or the field engineer's supervisor.

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

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

Applicants may access additional information through [myUL®](#), a dedicated portal providing secure access to inspection reports, procedures, variation notices, projects tracking information and other online tools created specifically for our customers.

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

For more information, please contact your local field engineer. Learn more at UL.com.



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