

**MARK INTEGRITY PROGRAM**

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

Underwriters Laboratories® 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.

**Criteria for variation notices**

If a UL field representative notes a nonconformance during the course of a UL Mark inspection visit, the field representative will write a variation notice. The issue may be a nonconformance with any UL requirement, but VNs are often written because the construction of product does not comply with requirements in the Follow-Up Services Procedure.

**Actions to be taken by a manufacturer in response to a variation notice**

When a VN 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.



3. Make a request to UL for a revision to the UL Follow-Up Service Procedure to include the new or revised construction. While this is occurring, a manufacturer shall hold shipment of all UL Marked nonconforming product, pending revision of the Follow-Up Service Procedure or further instructions from UL. Shipment of nonconforming product with the UL Mark must be suspended until UL has reviewed the new/revised construction and determined whether it is acceptable. UL may grant temporary acceptance to a manufacturer for a limited period of time while the Follow-Up Service Procedure revision is under consideration.

In addition to any option above, a manufacturer is also required to investigate the root cause of the VN and to 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 currently required, a UL field representative will review with a manufacturer the acceptability of any action plan in preventing the nonconformance from recurring before closing the VN.

### **Applicant notification**

A manufacturer is responsible for forwarding a copy of the VN 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 issues.

### **Appeals and disputes**

Please contact your UL field representative with requests for additional information and clarification regarding UL's Follow-Up Services related programs such as variation notices. If your field representative is unable to provide the requested information, the field representative will assist you in reaching UL's Field Operations management or Conformity Assessment Services 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.