

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 1 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

SGS U.S. Testing Company Inc.

Product Certification Program

Policy Handbook



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Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 2 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

TABLE OF CONTENTS

1.0	Purpose	3
2.0	Scope	3
3.0	Definitions	3
4.0	Product Listing Program Overview (Process Flow Diagram)	4
5.0	Policies	5
5.1	SGS product certification program description	5
5.2	Basic client responsibilities	6-7
5.3	Use of the mark (advertising rules)	8
5.4	Label rules	8
5.5	Product samples	9
5.6	Changes to product test standards	9
5.7	Client Complaint File	9
5.8	Confidentiality	9
5.9	Use of the SGS-USTC name	10
5.10	Contract period and termination	10
5.11	Fee for service	10
5.12	Force majeure	11
5.13	Manufacturer's Quality Assurance	11
5.14	USTC Subcontracting	11
5.15	Appeals, complaints and disputes	11
5.16	Client Request for Reduced Inspection	11-12
5.17	Minimum Allowed Plant Inspection Schedules by Program	12
5.18	Involuntary Suspension, Termination & Recall	12-13
5.19	Voluntary Suspension and/or Termination	13
6.0	Technical Requirements and Clarifications	13-14
7.0	Reference Documents	15
8.0	Revision History	15
	Appendix A – Listing of Accreditation / Recognition Bodies	16

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 3 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

1.0 Purpose:

To communicate the SGS USTC Product Certification Program Policies and/or Field Evaluation Program Policies to all program clients.

2.0 Scope:

All policies affecting the clients of the SGS USTC Product Certification or Field Evaluation Program. The current version of this document is available on-line at http://www.us.sgs.com/consumer_testing_us?lobld=16416 It is the responsibility of the client to meet the current program requirements. This document is subject to periodic review and amendment.

3.0 Definitions:

Product Certification System: Rules, procedures and management for carrying out third-party product conformity assessment. (ISO Guide 67:2004)

USTC Certification System: The system established by USTC to test, inspect, and evaluate products and manufacturers involved in a Listing Program, and to ascertain continued quality and compliance with established standards.

Product Evaluation: The process of testing and analysis to determine if a product meets the requirements of a published international or national standard.

Inspection: Examination of a product design, product, service, process or plant, and determination of their conformity with specific requirements or, on the basis of professional judgement, general requirements. (ISO-17020:1998)

Initial Factory Inspection: The process of evaluating the capability of the manufacturing facility, processes, and quality assurance system of the product manufacturer.

Surveillance: Systematic iteration of conformity assessment activities as a basis for maintaining the validity of the statement of conformity (ISO/IEC-17000-2004)

Follow-up Factory Inspection: The process of verification that a product continues to conform to the initial program requirements, by periodic evaluation of the manufacturing and quality assurance activities of the manufacturer.

Listing Agreement: The contractual arrangement under which a client is authorized to use the SGS USTC mark to indicate compliance with clearly defined product standards, subject to a program of verification administered by SGS USTC.

Listing Report: A document containing sufficient information from the initial product evaluation and qualification process for an inspector to determine continuing compliance. This document may alternately be identified as a Listing Report (including a critical component list), or a methods and procedures document (or inspection checklist) depending on the specific certification program.

Field Evaluation: Evaluation of products or installations in the field, where the product is located, by specially trained and designated staff, to specific technical requirements, such as the NEC (National Electrical Code), acceptable to the Authority Having Jurisdiction over the installation.

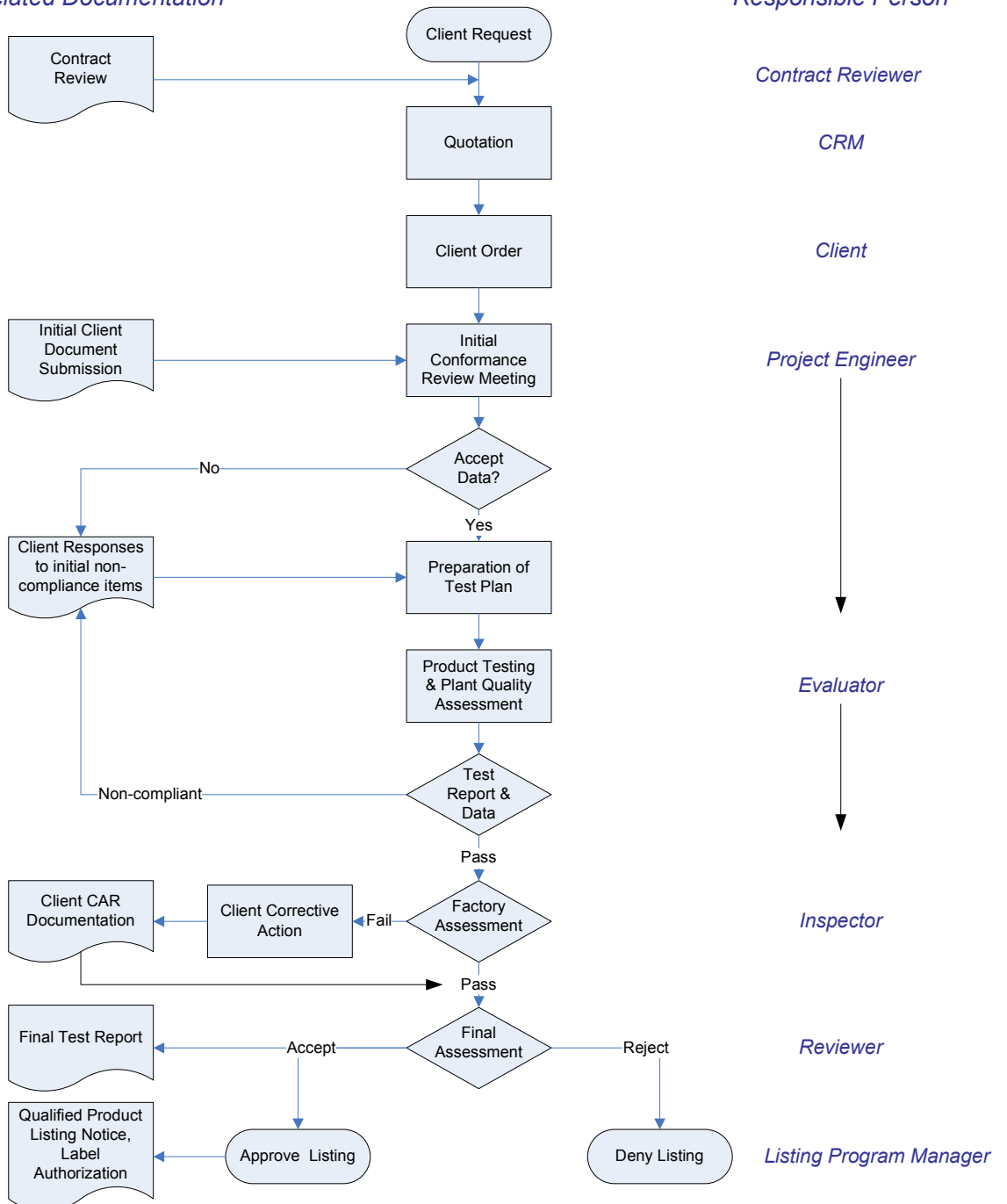
Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 4 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

4.0 A process flow diagram encompassing the basic process from client inquiry through authorization to apply the USTC mark is shown below (does not include follow-up inspection):

Product Listing Program Overview

Associated Documentation

Responsible Person



Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 5 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

- 4.1 Explanation of SGS USTC procedures for granting, maintaining, extending, suspending and withdrawing certification:
- 4.1.1 The procedure for **granting** the use of the mark includes the initial application process, the product evaluation, initial factory assessment, and successful completion of any required corrective actions. Execution of all legal obligations (i.e., signature of the listing agreement and payment of any fees).
- 4.1.2 **Maintaining** the use of the mark includes cooperation in the ongoing surveillance program defined in the listing report and/or program manual for each specific product. Typically that involves follow-up factory inspections and may also include periodic product testing. Prompt resolution of any corrective actions arising from the ongoing surveillance is mandatory.
- 4.1.3 The procedure for **extending** the use of the mark to related products manufactured in the same location and to the same standards as products already listed is defined in QSP27-1 ¶ 10, and involves qualification testing of each new product, but may allow waiver of the initial factory inspection by the Certification Manager, where there is a history of good performance by the facility.
- 4.1.4 See paragraph 5.18 below, for additional details on suspension, termination and recall.

5.0 Policies:

5.1 SGS product certification program description:

SGS-USTC operates certification programs under the authority of several accreditation bodies, including OSHA-NRTL, and International Accreditation Service, Inc. In addition, SGS-USTC manages several certifications schemes for private organizations that are not formally accredited, but follow the same procedural methodology as the accredited programs. These programs are funded by the fees for service charged in accordance with a published fee schedule. See Form QSF27-1-04 for additional detail. Additional application information is available upon request to SGS-USTC.

Explanation: OSHA-NRTL and product safety certification. The OSHA-NRTL program is directed toward workplace safety. There are several thousand UL and ANSI/UL product safety standards, but only about one third of them are within the OSHA-NRTL scope defined by Federal law. Within the SGS USTC programs, the scope specifically defined by the OSHA-NRTL recognition 2-90 currently contains 31 standards. In the SGS USTC ISO Guide 65 program there are 257 electrical product safety standards. Certification may, at clients request be to OSHA-NRTL, or to ISO Guide 65 depending on the requested standard and the end use of the product. It is the intent of SGS USTC to make sure that clients understand these differences.

ISO Guide 65 ¶ 8.1.2 (a): SGS-USTC will require that certification program clients always comply with the relevant provisions of the certification programme: SGS-USTC

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 6 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

will make such examinations as it deems necessary to determine whether in SGS-USTC's opinion, CLIENT's products conform to the applicable codes and standards (such products, codes and standards to be defined by each individual listing agreement). Such examinations will include an initial inspection of the Products, drawings, specifications, documents, materials and methods of construction and an assessment of CLIENT's capabilities for maintaining minimum acceptable levels of quality for conformance with the Standards. If SGS-USTC determines in its sole discretion that the Products conform to the Standards, SGS-USTC will then authorize CLIENT to use SGS-USTC's Certification Mark. SGS-USTC will then also conduct periodic inspections to ascertain continued compliance with the listing agreement terms and conditions, and of the certified product to the applicable codes and standards.

5.1.1 Field Evaluations are a special sub-set of product certification, differentiated by the fact that the label is only applicable to the specific product inspected, not a family of products manufactured, and only applies to the site where the specific product was inspected (i.e., the label is not transferable). Further, it is a "one-off" evaluation, with no follow-up inspection requirements. In spite of these differences, the programs operate under similar policies as noted by exception statements below. In the absence of a specific exception statement, the policies stated herein apply to such field evaluations.

5.1.2 The field evaluation program is not part of the OSHA-NRTL program, nor is it an ISO Guide 65 accredited program. It is a separately accredited program in accordance with IAS *Accreditation Criteria for Field Evaluation of Unlisted Electrical Equipment (AC354)*, *Recommended Practice and Procedures for Unlabeled Electrical Equipment Evaluation* developed by the American Council for Electrical Safety (ACES) and ISO/IEC 17020:1998 *General Criteria for the Operation of Various Types of Bodies Performing Inspection*.

5.2 Basic client responsibilities:

CLIENT will *per ISO Guide 65¶ 8.1.2 (b):make all necessary arrangements for the conduct of the evaluation, including provision for examining documentation and access to all areas, records (including internal audit reports) and personnel for the purposes of evaluation (e.g. testing, inspection, assessment, surveillance, reassessment and resolution of complaints);*

- a. Provide to SGS-USTC such samples of Products, drawings, specifications, and other documents and access to CLIENT's facilities and those of its subcontractors and suppliers as may be required from time to time by SGS-USTC for the purpose of SGS-USTC's examinations and inspections;
- b. Render such assistance as may be requested by SGS-USTC to enable such examinations and inspections to be performed without delay or interference, and to provide suitable work space therefore;
- c. Grant SGS-USTC free access without notice at any time during normal business hours to all of CLIENT's places of manufacture, assembly, shipment or storage of the Products to enable SGS-USTC to examine the Products, or any component parts thereof by witnessing of tests, inspection or other means for continued

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 7 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

compliance with the Standards, to monitor CLIENT's control systems applicable to the Products and to inspect any test data, calculations, records or reports required pursuant to SGS-USTC's follow-up procedures for determining continued compliance with the Standards;

- d. Designate a responsible person or persons to control security with respect to the SGS-USTC Certification Mark, to maintain records of each of the Products to which the Labels or Marks have been affixed and to provide SGS-USTC with access to these persons and records during normal business hours;

In accordance with ISO Guide 65 ¶ 8.1.2 (f) client shall use certification only to indicate that products are certified as being in conformity with specified standards.

- e. Affix or apply the SGS-USTC Certification Mark only at the place or places of manufacture when SGS-USTC has given initial authorization to CLIENT, only to those Products which comply with all requirements of the Standards, and only to those Products whose intended end users are commercial or professional enterprises;
- f. Submit to SGS-USTC any advertising referring to an SGS-USTC Certification Mark, compliance with the Standards, or inspection by SGS-USTC;
- g. Notify SGS-USTC of any proposed change in design, method, materials or place of manufacture of the Products; and prevent release of any modified product prior to SGS USTC approval.
- h. Pay SGS-USTC for the services and charges hereunder at the rates set forth in "Schedule B" of the listing agreement.

In addition, the CLIENT agrees that its equipment, plant, facilities and procedures shall conform to the recommendations of the relevant initial facility inspection or as otherwise may be specified in writing from time to time by SGS-USTC.

Failure of CLIENT to permit such access and provide such support shall be a breach of CLIENT's obligations, shall in the sole discretion of SGS-USTC terminate CLIENT's rights hereunder and be due cause for removal by the CLIENT of any SGS-USTC Certification Mark from the Products and the return of all labels containing such Marks to SGS-USTC.

CLIENT acknowledges that the sole discretion of SGS-USTC in issuing and continuing an SGS-USTC certification and listing is the essence of the listing agreement. CLIENT also acknowledges that CLIENT has the sole responsibility for the compliance of its Products with the Standards. SGS-USTC does not design, develop, manufacture, repair, maintain, produce or otherwise participate or consult in any way with CLIENT's Products or quality controls with regard thereto.

Paragraph 5.2, clauses c, d, and e do not apply to field evaluations.

5.3 Use of the mark (advertising rules):

In accordance with ISO Guide 65 ¶ 8.1.2 (d) client does not use its product certification in such a manner as to bring the certification body into disrepute and does not make any statement regarding its product certification which the certification body may consider misleading or unauthorized;

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 8 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

In the event that SGS-USTC deems that the Products are in compliance with the Standards, then CLIENT shall have the right to use the name of SGS-USTC and SGS-USTC Certification Mark in such form as shall be determined by SGS-USTC in the promotion, advertising, and labeling of the Products provided, however, that copies of all promotional, advertising and labeling material containing SGS-USTC's name or reference to its Certification Mark shall first have been submitted to SGS-USTC for its approval, and such approval has been given, in writing.

In accordance with ISO Guide 65 ¶ 8.1.2 (g) client endeavours to ensure that no certificate or report nor any part thereof is used in a misleading manner; and In accordance with ISO Guide 65 ¶ 8.1.2 (h) client agrees in making reference to its product certification in communication media such as documents, brochures or advertising, complies with the requirements of the certification body.

If in the opinion of SGS-USTC any advertising or representation of CLIENT may be misleading, SGS-USTC shall notify CLIENT and CLIENT shall terminate the use of such advertising or representation forthwith, shall cancel any space or time taken prior to receipt of such notification and scheduled for dissemination more than thirty (30) days thereafter, and shall take such other steps as SGS-USTC may deem appropriate in the public interest, which may include, in SGS-USTC's sole discretion, publication at CLIENT's expense of public or private retractions, advertisements or statements to correct such misleading statements. CLIENT also agrees that any deviation or variance in its Products from the Standards used by SGS-USTC in its certification and listing program shall allow SGS-USTC, in its sole discretion and at CLIENT's expense, to initiate such action as SGS-USTC considers necessary, including, but not limited to, withdrawal of the supply of Labels containing the SGS-USTC Certification Mark, removal of Labels containing the SGS-USTC Certification Marks from non-conforming products, removal of CLIENT's Products from the published Listings and notification of regulatory bodies, authorities having jurisdiction and other concerned parties.

For field evaluation listings, the client shall comply with all USTC requirements, and shall not use the statement of conformity in a misleading or unauthorized manner. The client shall make claims only within the scope of the statement of conformity and shall not use the statement of conformity in a manner that would bring USTC into disrepute. Further, the statement of conformity can only be used to indicate that the product is in conformity with the standards specified on the statement of conformity.

5.4 Label rules:

The labels on which an SGS-USTC Certification Mark is contained shall be obtained only from SGS-USTC or produced by the CLIENT after advance written approval of such label by SGS-USTC and shall be the property of SGS-USTC until the Products to which they are affixed have left the possession of the CLIENT. CLIENT shall assume all responsibility for all information on labels produced by CLIENT. SGS-USTC has granted to CLIENT a non-exclusive license to use its Certification Mark and labels in accordance with the listing agreement. The SGS-USTC Certification Mark shall be affixed or applied only in such manner and in such form as shall be approved in advance by SGS-USTC. The use of such Mark shall constitute an affidavit and warranty by CLIENT that the Product has been made without change and in compliance with the applicable requirements of the Standards.

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 9 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

It is the responsibility of the listing client to take care to minimize the risk of label counterfeiting and misuse. Examples of good practice include molding or stamping label information in plastic and metal parts, which cannot be removed without destroying the integrity of the part. If removable labels are used, they must be "tamper-resistant" such that upon attempted removal, they are permanently defaced and cannot be applied to another product.

This paragraph is not applicable to field evaluation, as a USTC representative will apply the mark and no labels will be provided to the client for self marking.

5.5 Product Samples:

SGS-USTC may request, or CLIENT may submit, a sample of any changed Product for examination at CLIENT's expense. If the Product as changed is deemed by SGS-USTC to be in compliance with all requirements of the Standards, CLIENT shall be so notified by SGS-USTC in writing, and CLIENT may thereafter affix, apply or use the SGS-USTC Certification Mark in connection with the Products as changed. CLIENT shall pay SGS-USTC's then existing fees and expenses for such services. Failure of CLIENT to give timely notice to SGS-USTC of a proposed change to a Product shall in the sole discretion of SGS-USTC terminate the rights of CLIENT under the listing agreement with respect to the use of any SGS-USTC Certification Mark on, or in connection with, the changed Product.

This paragraph is not applicable to field evaluation.

5.6 Changes to product test standards:

In the event that a Standard is withdrawn, or revised during the term of the listing agreement, SGS-USTC shall determine the date by which use of the SGS-USTC Certification Mark under the Standard shall terminate and shall notify CLIENT of such date. In such event, CLIENT shall, if requested by SGS-USTC, deliver to it all nameplates and labels containing SGS-USTC Certification Marks and any other means of applying such Marks as evidence of compliance with the Standard, before revision or withdrawal. CLIENT may submit test reports and other evidence satisfactory to SGS-USTC that CLIENT's Products comply with a revised Standard and SGS-USTC may, by letter addressed to CLIENT in duplicate for acceptance and return to SGS-USTC, renew the use of the SGS-USTC Certification Mark under the terms and conditions of the listing agreement with such amendments as may be mutually agreed upon.

This paragraph is not applicable to field evaluation, as the only standard or revision that applies to a field label is the current standard referenced in the evaluation report at the time of the field evaluation.

5.7 Client Complaint File:

Suppliers of certified products are required to keep records of all complaints made known to the supplier relating to a product's compliance with requirements of the relevant standard and to make these records available to the certification body. Appropriate action must be taken with respect to such complaints and any deficiencies found in products or services that may affect compliance with the requirements for certification. Records documenting the actions taken must be kept.

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 10 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

This paragraph is not applicable to field evaluation.

5.8 Confidentiality:

SGS-USTC shall hold in strict confidence all design and manufacturing data, test and inspection reports and any other information provided by CLIENT in accordance with the terms of the listing agreement relating to any aspect of CLIENT's business. Such data, reports and other information may, with the written consent of CLIENT or in response to legal process, be made available by SGS-USTC to administrative and governmental bodies, or others.

5.9 Use of SGS-USTC name:

In accordance with ISO Guide 65 ¶ 8.1.2 (c) client shall make claims regarding certification only in respect of the scope for which certification has been granted.

CLIENT shall not use the name of SGS-USTC, its test results or its Certification Mark in connection with the promotion, advertising or labeling of any product which has not been determined by SGS-USTC to meet the Standard as provided herein, nor shall CLIENT use SGS-USTC's name, test reports, or SGS-USTC Certification Mark after the termination of the listing agreement. It is understood and agreed that CLIENT may not use the corporate names of SGS U.S. Testing Company Inc., United States Testing Company, Inc., their marks, seals or insignia in advertising to the general public, except as specifically approved in writing in advance by SGS-USTC which approval may be withheld at SGS-USTC's sole option.

5.10 Contract period and termination:

In accordance with ISO Guide 65 ¶ 8.1.2 (e) upon suspension or cancellation of certification, client will discontinue its use of all advertising matter that contains any reference thereto and returns any certification documents as required by the certification body;

Commencing on the date of acceptance by SGS-USTC, the listing agreement shall be for a period of One (1) Year, and shall continue thereafter until and unless terminated by either party. Subsequent to the initial One (1) Year term, the listing agreement may be terminated by thirty (30) days written notice to the other party, mailed by certified mail, return receipt requested, to the address of such other party hereinabove set forth or to such other address as may have been furnished in writing. CLIENT agrees that upon termination of the Agreement for any reason, CLIENT will return all SGS-USTC Certification Marks in its possession, will provide to SGS-USTC, or dispose of to the satisfaction of SGS-USTC, any stamps or dies that indicate SGS-USTC certification, and will reimburse SGS-USTC for inventory of labels manufactured by SGS-USTC and SGS-USTC will be entitled to remove the Products from its published listings.

This paragraph is not applicable to field evaluation, as a USTC representative will apply the mark and no labels will be provided to the client for self marking.

5.11 Fees for service:

SGS-USTC may change its fees from time to time during the term of the listing

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 11 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

agreement upon written notice to CLIENT, provided that the fees charged to CLIENT shall be consistent with the fees charged to other clients of SGS-USTC for similar services. CLIENT will pay SGS-USTC a late payment charge equal to 1.5% per month or part thereof from the date of the invoice for any payments by CLIENT received by SGS-USTC more than 30 days after the date of the invoice, and all costs of collection thereof, including attorneys' fees.

5.12 Force majeure:

Nothing herein contained shall be deemed to impose any obligation or penalty upon either of the parties hereto if performance of any obligation herein provided for is prevented by strike, riot, law, regulation or order, civil commotion or any cause beyond the control of such party.

5.13 Manufacturer's Quality Assurance:

If the manufacturer is ISO 9001 registered, then a copy of the ISO certificate will be accepted as evidence of a compliant quality system. If the manufacturer is not ISO 9001 registered then the manufacturer's quality assurance documentation shall include the required minimum information as stated in Form QSF27-2 "Recommended Quality Management System".

This paragraph is not applicable to field evaluation.

5.14 USTC Subcontracting:

USTC may, at its discretion, and as permitted by the regulations of the specific product certification program, subcontract product evaluation or inspection work to qualified SGS affiliates, outside firms or individuals. Client's consent is granted for SGS to obtain and use subcontractors at SGS's discretion without other prior notification to the client.

5.15 Appeals, complaints and disputes:

Feedback from clients is welcome, and is used as part of our continuous improvement process. Appeals, complaints and disputes brought to USTC (the certification body) by suppliers or other parties are subject to a documented procedure for complaint processing that includes investigation, response and corrective action, where appropriate. USTC maintains records of all appeals, complaints and disputes and remedial actions relative to certification.

Initially complaints are forwarded to the engineering reviewer responsible for the certification for investigation and response. If the client requests, they may dispute the response received from the reviewer, the finding can be escalated to the Listing Program Manager. If the client remains dissatisfied with the response received from the Listing Program Manager, the finding can be escalated to the Listing Program Review Committee for final USTC disposition. The client always has a final right of appeal to the accreditation body that administers the program under which their product is listed. Appendix A lists the addresses for the various accreditation bodies.

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 12 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

Note: In accordance with ISO Guide 65 ¶ 12.1 any information on which a decision is based which comes from any source other than the evaluation process shall be made known to the applicant.

5.16 Client Request for Reduced Inspection

Surveillance audits are scheduled based upon the requirements of the specific program under which the product is being certified. When not otherwise specified, the de facto audit schedule for all new clients is four factory inspection/audits per year, usually scheduled on a quarterly basis. However, when seasonal or non regular production is involved, it may be necessary to schedule the requisite four inspections within a single production cycle. When required by regulatory requirements or specific program requirements, products continue on the schedule mandated by the program for the life of the certification. However, when not otherwise specified by regulatory or program requirements, a client may request that the certifying body reduce the factory inspection/audits. Such requests will be evaluated in accordance with pre-defined and specific risk criterion when justified by the manufacturer's production schedule and previous inspection results. In no case, would USTC permit less than two inspections per year.

Examples of risk criterion (greater safety concerns) to be considered may include (but are not limited to) the following:

- Products that are intended for use in hazardous locations;
- Evidence or suspicion that the manufacturer has not been producing a product in conformance with the product safety requirements or failure to maintain appropriate controls over its production process at a facility;
- When a facility is in a region where mislabeling or counterfeit labeling occurs frequently and there is a question about the manufacturer's ability to control and mark products correctly;
- Evidence or suspicion that the manufacturer is not using or controlling the certification mark(s) correctly; or
- Evidence or suspicion that safety concerns exist concerning the products.

This paragraph is not applicable to field evaluation.

5.17 Minimum Allowed Plant Inspection Schedules by Program

- ISO Guide 65:
- OSHA-NRTL – Hazardous location (HAZLOC): 4 per year
- OSHA-NRTL – non-HAZLOC: 2 per year
- SCC (Standards Council of Canada): 2 per year
- RVIA (Recreational Vehicle Industry Ass'n): 4 per year
- ICC-ES (ICC Evaluation Services): 4 per year
- SSCC (Snowmobile Safety Certification Comm.): 4 per year
- OPEI (Outdoor Power Equipment Institute): 4 per year
- EPA WaterSenseSM program * 1 per year

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 13 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

**Note – This program also requires product re-testing every 5 years.*

This paragraph is not applicable to field evaluation.

5.18 Involuntary Suspension, Termination & Recall

Deficiencies in the product's test performance or the manufacturer's quality assurance and fabrication procedures will be evaluated in accordance with the Listing Program requirements. The degree of action taken by USTC will vary with the degree of noncompliance and the effect of the deficiency on product safety and intended use of the product.

A suspension may be repealed based on the manufacturer's proven compliance with the Listing Program requirements. Re-approval will be based on the manufacturer's ability to rectify any deficiencies within the time period established for correction. The level of reevaluation required for re-approval and the allotted time period for corrections will be established by the Listing Program Manager.

Approval to the Listing Program will be terminated upon the manufacturer's inability to rectify any noncompliance within the allotted time period. Termination of approval will occur after review and confirmation by the Listing Program Manager of the non-compliant program status and issuance of a Notice of Delisting and Removal of the SGS USTC Mark (QPF27-1-16)

USTC reserves the right to publish notice of the termination of the certification.

5.19 Voluntary Suspension or Termination:

A client may request a voluntary suspension of listing privileges, for a period not to exceed 12 months. Typically this will be for business reasons such as suspended production due to lack of demand, etc. In this case, carrying out quarterly inspections imposes an undue expense with no benefit either to the client or to the certifying body. If a voluntary suspension extends beyond 12 months, it automatically becomes a voluntary termination, and requires a new program application and complete product re-evaluation to restore the use of the mark. All voluntary suspensions and/or terminations must be documented using form QSF27-2-10.

6.0 Technical Requirements and Clarifications

6.1 Manufacturing requirements for final inspection:

Each product certification Listing Report / Inspection Procedure specifies the requirements (if any are applicable) required by the product standard for Routine Tests for Manufacturing and Production. This notice is to clarify the intent of such tests - to be FINAL INSPECTION actions taken to qualify a product prior to placement of the certification mark.

In-process inspection steps cannot substitute for the FINAL INSPECTION activities that must be used to justify certification of the product. If the required tests are also carried out during in-process inspection, they must be repeated after final assembly of the product is completed and documented as FINAL INSPECTION actions.

6.2 Manufacturing requirements for calibration control:

When products are certified for product safety under either the OSHA-NRTL or ISO

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 14 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

Guide 65 product certification programs, the requirements of ISO-9001 for control of monitoring and measuring equipment must be complied with. The relevant portion of ISO-9001:2008 § 7.6 is as follows:

“Where necessary to ensure valid results, measuring equipment shall

- a) be calibrated or verified, or both, at specified intervals, or prior to use, against measurement standards traceable to international or national measurement standards; where no such standards exist, the basis used for calibration or verification shall be recorded (see 4.2.4);*
- b) be adjusted or re-adjusted as necessary;*
- c) have identification in order to determine its calibration status;*
- d) be safeguarded from adjustments that would invalidate the measurement result;*
- e) be protected from damage and deterioration during handling, maintenance and storage.”*

In order to meet this requirement, the minimum expectation is that every instrument used to determine incoming inspection quality, in-process inspection quality, and final inspection quality will be calibrated by a calibration service provider that is ISO-9001 registered with calibration service in their declared scope of service. Calibration certificates from such providers should indicate as a minimum that the calibration was performed in accordance with ANSI/NCCL Z540-1-1994, and include a statement that the calibration is traceable to the National Institute of Standards and Technology (NIST) or equivalent international or national measurement standards.

Note: In order for in-house calibration to be accepted in place of an external calibration service provider, there must be objective evidence of a competent (trained and certified) calibration technician and availability of a master set of standards that are independently calibrated and fully traceable to NIST. Under such circumstances, calibration should be included in the manufacturer’s scope on their ISO-9001 certificate.

Preferred Option:

It is always preferred that outside calibration service providers be accredited to ISO-17025. In ISO-17025 calibrations, the specific calibration service required must be listed within the calibration service provider’s ISO-17025 scope of accreditation. ISO-17025 accredited calibration service providers are held to a much more rigorous standard than those registered to ISO-9001, and hence you have greater assurance of the quality of the calibration. Further, under ISO-17025, the calibration service provider must provide estimates of measurement uncertainty, which is valuable information in determining if results obtained near the limits of the acceptance criteria are meaningful or not.

Unacceptable Practices:

Verification is not a substitute for calibration. Every instrument used to determine incoming inspection quality, in-process inspection quality, and final inspection quality must be calibrated and traceable to NIST. Verification is an important activity, but it is limited to making intermediate checks between calibrations. The great value of verification is that if an instrument is found to be out of calibration when it is next calibrated, you will need to determine if the out-of calibration condition affected the acceptance of the items under test during the period between the last verification and the calibration. Without intermediate verification, your entire production since the last calibration may be brought into question.

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 15 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

7.0 Reference Documents:

TITLE	NUMBER
Third Party Certification System for Product Standard Conformity	QSP27-1
Product Certification Follow-up Inspection Process	QSP27-2
Notice of Delisting and Removal of the SGS USTC Mark	QPF27-1-16
USTC Listing Client Request for Voluntary Listing Suspension and/or Termination	QSF27-2-10

7.0 Revision History:

DATE	REVISION	REASON FOR REVISION	APPROVED
5-07-08	0	Initial Issue	R. Nichols
6-18-08	1	Added information on the Field Evaluation program	R. Nichols
6-23-08	1.1	Added information on the EPA WaterSense SM program	R. Nichols
11-25-08	1.2	Added note to ¶ 5.15, and added ¶ 5.18	R. Nichols
5-19-09	1.3	Added explanation of OSHA-NRTL vs. non-NRTL listings to ¶ 5.15	R. Nichols
9-28-09	1.4	Added section 4.1 to explain the procedures for granting, maintaining, extending, suspending and withdrawing certification, and added clarification of client responsibilities throughout section 5.0 per ISO Guide 65 ¶ 8.1.2.	R. Nichols
10-12-09	1.5	Added section 5.19 to define process for client's voluntary suspension and/or termination of listing.	R. Nichols
10-21-09	1.6	Added Section 6.0 to provide technical requirement clarifications	R. Nichols
12-7-09	1.7	Added language to Section 5.4 to address label counterfeiting.	R. Nichols

Procedure: QSP 27-3	Title: Product Certification Program Policy Handbook	Prepared by: R. Nichols	Page: 16 of 16
Authorized by: Listing Program Guidance Committee	Applicable To: All Product Certification Program Clients	Rev. 1.7 Rev Date: Dec. 7, 2009	Date Issued: May 7, 2008

Appendix A

Listing of Accreditation / Recognition Bodies For USTC Product Certification Programs

ISO Guide 65:	International Accreditation Service 5360 Workman Mill Road Whittier, CA 90601
OSHA/NRTL:	Occupational Safety and Health Administration U.S. Department of Labor 200 Constitution Ave., N.W., Room N3655 Washington, D.C. 20210
SCC:	Standards Council of Canada (Application pending) 270 Albert Street, Suite 200 Ottawa, Ontario K1P 6N7 Canada
EPA WaterSenseSM	WaterSense Certification Scheme U.S. EPA Office of Wastewater Management (4204M) 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
Field Evaluation:	International Accreditation Service 5360 Workman Mill Road Whittier, CA 90601
ICC-ES:	International Code Council - Evaluation Services 5360 Workman Mill Road Whittier, CA 90601
RVIA:	Recreational Vehicle Industry Association 1896 Preston White Drive Reston, VA 20191
SSCC:	Snowmobile Safety and Certification Commission 1640 Haslett Road, Suite 170 Haslett, MI 48840
OPEI:	The Outdoor Power Equipment Institute 341 South Patrick Street Old Town Alexandria, VA 22314