

SUBJECT: MARKET & LEGAL ACCEPTANCE OF ETL PRODUCT LISTINGS



Ericson is committed to Electrical Safety on the jobsite.

As a manufacturer of electrical safety products, Ericson Manufacturing is committed to worker safety and compliance to all National, State, Province and Local codes. Our products are designed and manufactured to the highest standards for code compliance and quality. Ericson uses many NRTL (Nationally Recognized Testing Laboratory) for 3rd party listing and testing certification. In addition, our adherence to ISO9002 Quality Standards ensures our customers and inspection officials that our products meet those stringent standards through verified internal and external inspections.

■ Is the ETL Listed Mark legal equivalent to the UL and CSA Listed Marks?

The true legal requirement to test and certify products for sale in the United States is a designation by the Occupational Safety and Health Administration (OSHA) as a Nationally Recognized Testing Laboratory (NRTL). An NRTL functions to provide independent evaluation, testing, and certification of any electrically operated or gas- and oil-fired product. ETL is recognized as an NRTL in the United States and, in a similar capacity, as a Testing Organization and Certifying Body in Canada by the Standards Council of Canada.

A product bearing the ETL Listed Mark is determined to have met the minimum requirements of prescribed product safety standards. Moreover, the mark indicates that the manufacturer's production site conforms to a range of compliance measures and is subject to periodic follow-up inspections to verify continued conformance.

■ What's the difference between the UL, CSA, and ETL Listed Marks?

All three marks demonstrate that the product that bears it has met the minimum requirements of widely accepted product safety standards as determined through the independent testing of a Nationally Recognized Testing Laboratory (NRTL). And, as part of that testing regimen, the product manufacturer has agreed to periodic follow-up inspections to verify continued compliance.

■ What is an NRTL?

A Nationally Recognized Testing Laboratory (NRTL) is an independent laboratory recognized by the Occupational Safety and Health Administration (OSHA – U.S.) and Canadian Centre for Occupational Health and Safety (CCOHS) and the Standards Council to test products to the specifications of applicable product safety standards – such as those from Underwriters Laboratories (UL), Canadian Standards Association (CSA), ANSI and other standards-writing bodies. An NRTL's function is to provide an independent evaluation, testing, and certification of any electrically operated or gas- and oil-fired products. In the U.S., OSHA maintains a listing of approved NRTLs on their website at:

<http://www.osha.gov/dts/otpc/nrtl/nrtllist.html>

In Canada, all electrical equipment must bear evidence of either a mark or a label of a certification agency accredited by the Standards Council. The Standards Council also keeps an approved listing on their website with the latest NRTLs at: <http://www.scc.ca/en/search/accredited-bodies>

■ What are the specifics of the NRTL program?

The NRTL program is part of OSHA's Directorate of Technical Support in the U.S. and OHS and The Standards Council in Canada. As part of OSHA's directive to ensure that products are safe for use in the U.S. workplace, the NRTL program recognizes the capabilities of private sector organizations to determine if specific products meet consensus safety standards. OSHA safety standards are United States law and can be found in Title 29 of the Code of Federal Regulations (CFR). More specifically, the provisions for NRTL certification can be found within Part 1910 of the CFR (29 CFR Part 1910). It is important to note that OSHA's recognition of an NRTL is not a grant of government authority, but rather an acknowledgment of the organization's ability to perform product safety testing and certification within the scope of its OSHA recognition. Established in 1978, CCOHS promotes the total well-being physical, psychosocial and mental health - of working Canadians by providing information, training, education, management systems and solutions that support health, safety and wellness programs. A not-for-profit federal department corporation, CCOHS is governed by a tripartite Council - representing government, employers and labor - to ensure a balanced, approach to workplace health and safety issues. Local Province authorities also exist and have inspection and certification programs designed to ensure safety. See the next question for details.

■ Is the ETL Mark accepted by local Province Safety Authorities in Canada?

Yes. An example is the ESA (Electrical Safety Authority) in Ontario. They recognize all approved NRTL marks that contain the "c" adder on the mark. The ESA's authority to ensure electrical product safety in Ontario is governed by Regulation 438/07. Another example is the British Columbia Safety Authority (BCSA). As the Province's delegated authority, they mandate the safe installation and use of technical equipment. They promote compliance to standards to ensure consistency and fairness, and conduct onsite inspections – particularly in high-risk situations. They oversee safety in the following technologies: Electrical Systems, Gas , Boiler, Pressure Vessels, and Refrigeration Systems, Amusement Rides, Elevating Devices (such as elevators and escalators) Passenger ropeways (such as aerial trams and ski lifts) and Railways (including rapid transit).

■ Aren't manufacturers required to use UL for their compliance testing? Isn't this mandated by the standards themselves?

The simple answer to both questions is "no." In fact, this misconception has misled many manufacturers to believe that they don't have a choice in their third-party testing partner. To satisfy the prerequisite of having your products tested by an independent organization, the true legal requirement is that the laboratory which performs the testing be a Nationally Recognized Testing Laboratory (NRTL) recognized by OSHA.

■ What does the ETL Listed Mark mean when displayed on my product?

In short, the ETL Listed Mark indicates that your product has been tested by a NRTL, found in compliance with accepted national standards, and meets the minimal requirements required for sale or distribution. To your distributors, retailers, and customers, the ETL Mark is assurance that the product is compliant with safety standards, having been tested and certified by a third-party organization.

■ Will retailers accept my product if it bears the ETL Listed Mark?

Yes. Since the ETL Listed Mark is an accepted and recognized demonstration of product compliance, and testing is performed by an NRTL, there is no reason why retailers should not accept products bearing the ETL Listed Mark. Any indication otherwise by an individual retailer or distributor likely stems from misinformation in the marketplace—the same misinformation that has led some manufacturers to believe they don't have a choice in their third-party testing organization.

■ What should I tell my clients who aren't familiar with the ETL Listed Mark?

There is no standard formula for better acquainting clients and customers with the ETL Listed Mark. Depending on the background, circumstances, and other details of a given situation, the correct approach will be unique from one instance to another. Others may erroneously believe that the UL Mark is the only acceptable demonstration of product compliance and require a more thorough explanation of the true legal requirements behind third party product safety testing. It is important to listen closely to your client's issues and provide them with real answers to their concerns. Inform them about the NRTL program. Explain to them how our Product Safety Certification Program includes the

same testing, listing, labeling, and follow-up inspection services as UL, and that ETL is accredited by the same organizations, agencies, and regulatory bodies.

■ **What countries accept the ETL Mark?**

The ETL Mark is an accepted demonstration of product compliance in both the United States and Canada.

■ **Do local inspectors know the ETL Listed Mark?**

Yes. The ETL Listed Mark is recognized by local inspectors and Authorities Having Jurisdiction (AHJs) throughout North America and also in some areas of South America. A NRTL recognized by OSHA, the ETL Listed Mark is an accepted alternative to UL and, as such, inspectors and AHJs recognize, acknowledge, and accept the mark as proof of product compliance.

■ **Is ETL Listed Mark is accepted throughout North America?**

Amway Corp, JCPenney, Sam's Club, Sears, and the list goes on. Since the ETL Listed Mark is a recognized and accepted indicator of a product's compliance to safety standards, retailers, inspectors, or Authorities Having Jurisdiction (AHJs) all accept ETL Listed Products.

■ **How long has the ETL Listed Mark Been Around?**

"ETL" has been around over 100 years. In fact, the original Electrical Testing Labs (ETL) was founded by Thomas Edison in 1896. Electrical Testing Labs was formed to address concerns of lamp safety and performance issues. Edison's vision was to provide assurance to consumers, through various types of product performance and safety tests. The basic principles of Edison's third-party lamp testing methods remain the same today. Experts monitored lamps and bulbs to determine how long they would burn, the luminous intensity, and if everything burned as it should – without combustibility or explosion.

■ **What are the variations of the ETL Listed Mark?**



A product bearing the ETL Listed mark with the "us" identifier at the 4 o'clock position has been tested and deemed compliant to U.S. product safety standards only. An ETL Listed mark with a "c" identifier at the 8 o'clock position means the product bearing it complies with Canadian product safety standards only. And an ETL Listed mark with both "us" and "c" identifiers at the 4 o'clock and 8 o'clock positions respectively, signifies that the product bearing the mark complies with both U.S. and Canadian product safety standards.

■ **What if I need more information?**

Contact your local Authorized Ericson Factory Representative for more details. You can find your local Representative for both the U.S. and Canada on our website: <http://www.ericson.com/where-to-buy-electrical.html>

■ **What if I need proof of a product listing?**

Ericson maintains a live database of the latest listing and certifications provided by the NRTLs. You may access and search a particular product part number on the Ericson website: <http://www.ericson.com/agency.html>

Links for more information:

OSHA NRTL LIST: <http://www.osha.gov/dts/otpca/nrtl/nrtllist.html>

Standards Council of Canada NRTL List: <http://www.scc.ca/en/search/accredited-bodies>

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