



EEMAC

Electrical Equipment Manufacturers Advisory Council

EEMAC POSITION PAPER ON MUTUAL ACCEPTANCE OF ELECTRICAL COMPONENT CERTIFICATION

**By Joseph Neu, Vice-President EEMAC
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Introduction:

Electro-Federation Canada is a national, not-for-profit industry association representing over 250 member companies in the electrical, electronics and telecommunications industries in Canada. The Electrical Equipment Manufacturers Advisory Council (**EEMAC**) is the meeting place for over 80 companies involved in the manufacturing and sale of electrical products, systems and components in Canada. EEMAC focuses on the economic well-being of the industry through the provision of high quality market information on a product, sector and geographical basis, technical standards and regulatory strategies aimed at ensuring global market access for members' products, providing tools to competitiveness for member companies and ensuring alliances with key North American organizations.

EEMAC Concern and Industry Issue

Recently, Underwriters Laboratories Inc. (UL) announced that it would no longer certify end-use electrical products that contain components tested and certified by competing laboratories such as CSA International, unless components are re-tested or replaced with components tested and certified by UL. In response, CSA International announced that it would continue its policy of accepting components certified by other OSHA-accredited organizations.

Industry, represented by EEMAC and Electro-Federation Canada, supports the mutual acceptance of electrical components because it recognizes both national accreditation systems and balances the industry's need to move product cost-effectively between markets. We encourage CSA and UL to work together towards this end.

EEMAC Fully Accepts UL and CSA Product Accreditation

The Occupational Safety and Health Administration (OSHA) and the American National Standards Institute (ANSI) both accredit CSA and UL. **This signifies that CSA and UL are qualified to test and certify electrical components and other products for the U.S. market.** Any suggestion to the contrary is wrong.

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Industry Needs Choice and a Competitive Marketplace

UL's new component policy creates artificial barriers to the free exchange of goods, which in our opinion contravenes NAFTA's objective to allow the free flow of goods across North America. Our industry supports the NAFTA objectives.

UL's Policy Change will Increase Costs, Decrease Product Choices

When testing laboratories do not accept electrical components tested and certified by qualified competing laboratories, redundant component testing and inspections are required. The consequences are **higher costs and lost time for component suppliers and end-product manufacturers.**

Why is the IT Industry Favoured over EEMAC members?

Since 1994 UL has offered mutual component acceptance on components in end-use Information Technology products. The electrical components industry deserves the same for its products.

UL argues that its new component acceptance policy for the electrical industry cannot be altered until UL is convinced that acceptance of CSA certified components will not jeopardize product safety. Our understanding is that in more than 8 years of mutual component acceptance by UL and CSA, there have been no product safety issues.

The Move to One Mark

The ENEC agreement in Europe is a working model of successful mutual component acceptance across multiple nations. All qualified and member testing laboratories issue the same ENEC Mark when products comply with applicable national standards. This enables laboratories to compete on the basis of service resulting in a more open and flexible marketplace for manufacturers.

EEMAC and EFC prefer this model, as long-term solution. In the interim, we support CSA's position and its policy to accept components in end-use products that have been certified by accredited certification organizations without additional testing, without application of an additional certification mark and without follow-up inspections.

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