



OSHA & NRTL Establish Testing Requirements for Product Safety

OSHA stands for Occupational Safety and Health Administration. OSHA is a key United States agency whose main area of responsibility is to establish guidelines that are required of employers to ensure the safety and health of American workers in their daily work environment.

NRTL stands for Nationally Recognized Testing Laboratories, and is a program that OSHA established to recognize organizations that have met the necessary qualifications to test various products for their safety.

All testing labs must qualify through OSHA to be recognized under the NRTL program. It is important to note that all testing labs listed under the NRTL are *private* testing labs and *are not* governmental testing labs.

The most familiar testing lab under the NRTL program is Underwriters Laboratories (UL), but there are many more.

The actual longest established lab under the NRTL program is ETL-Intertek. Beyond these two testing labs, there are others, such as:

- CSA International
- MET Laboratories
- SGS U.S. Testing Company, Inc.
- TUV Rheinland of North America, Inc.
- TUV SUD America, Inc.

In all cases, these testing labs are independent private labs that follow the requirements established by OSHA under the NRTL program for product safety.

The level of product safety certification by any of these testing labs is equal.

The definition of Listing vs. Recognition is as follows:

- Listing refers to an end product which is stand-alone and needing no additional requirements for safety.
- Recognition refers to certification of a component. This product requires that some additional requirements be met to maintain safety.

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*LEDtronics
uses both
UL and ETL
to achieve listing
and/or recognition.*



ETL Mark



UL Mark



UL Component Mark

KEY POINTS TO REMEMBER

- ▶ *UL is not the only NRTL to provide both Listing and Recognition to Products*
- ▶ *UL is not a United States Government Agency for Testing*
- ▶ *All labs under the NRTL program are private, not governmental agencies*
- ▶ *Certifications from any NRTL are equally acceptable to government, customs and inspectors*
- ▶ *Tested by or Listed by an NRTL is the requirement, not Tested by UL*

You will see a number of different marks/icons from both UL and Intertek. Intertek uses the ETL mark:

UL has the following marks (note that UL will periodically change their marks:

- ▶ cUL – c is for Canada
- ▶ ULus – The United States
- ▶ cULus – both Canada and the U. S.



ETL uses a similar nomenclature:

- ▶ cETLus – both Canada and the U. S.
- ▶ ETL – uses the same marking with the nomenclature changing based on the being either Listed or Recognized



The NRTL determines if products achieve and meet standards. These standards provide assurances that these products meet OSHA safety requirements for safe use in the United States.

Examples of some of these standards are as follows:

- ▶ UL1598 – Standard for Safety for Luminaires, issued jointly with Canada C22.2 No. 250.0-08
- ▶ UL1993 – Standard for Safety for Self-Ballasted Lamps and Lamp Adapters, issued jointly with Canada CSA C22.2 No. 1993-09

When UL, as shown above, appears in front of the standard number, it **does not** mean UL is the only lab testing to that standard. All labs test to the same standards.

Your opportunity then is to educate your customer about these private testing labs, so that they are aware on how the system works and how UL is not the sole answer or route for listing or recognition, rather only one of many private testing labs that are under OSHA's NRTL program.



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