



**LOVAG Operational Document
OD 03-04, Ed.2.0, October 2013**

(This LOVAG OD belongs to the General Instruction LOVAG G3)

Use and Operation of Witnessed Manufacturer's Testing Laboratory (WMTL)
by a LOVAG Certification Body (LCB) applying LOVAG Technical Witness (LTW).

1. Introduction

- The purpose of this Operational Document (OD) is to provide a process to utilize qualified technical staff to carry out WMT under the responsibility of the LCB by providing LOVAG testing services at the manufacturer's laboratory.
The witnessing procedure can be applicable for granting the LOVAG Mark licence or LOVAG Certificate
- The person who witness tests must have the necessary competence and expertise to carry out tests to the relevant standard(s);
- The application to conduct WMT must be approved beforehand by the relevant LCB.

2. Definitions

- "LOVAG Certification Body (LCB)" - Certification body being a member of LOVAG and granting the LOVAG Mark licence or LOVAG Certificate for a product;
- "LOVAG Technical Witness (LTW)" - A specified, competent and contracted person, operating under the responsibility of a LCB for testing at a manufacturer's laboratory, who locally carries out the required WMT activities. The LTW may be a person from the responsible LCB as well. See Annex D for permitted and not-permitted, combinations;
- "Independent Individual" is a person legally registered who when working under contract for a LCB, acts for this LCB as an LTW;
- A WMTL is a manufacturer's testing laboratory, registered by LOVAG (LTL), being used to test specified products for which the manufacturer has production responsibility. An LTW witnesses all tests done by a manufacturer's laboratory which uses its own test equipment;
- "LOVAG Test Laboratory (LTL)" - Laboratories registered by LOVAG, complying with the Standards ISO/IEC 17025 and performing tests according to LOVAG rules. They are identified in the certificate with the LOVAG code.

Remark:

Changes and additions in comparison to edition 1.0 are indicated by yellow marking

LOVAG OD 03-04 Edition 2.0	Approved by LOVAG Management Committee on 17 th October 2013 Signed Michel Brenon, Chairman of LOVAG
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3. Responsibilities

3.1 Responsibilities of the LCB:

The LCB is responsible for:

- selection and designation of the LTW;
- ongoing supervision and monitoring of the LTW;
- ongoing training of the LTW in the procedures and operation of the LOVAG Scheme;
- qualification of both the initial and ongoing technical competence of the LTWs through assessments and auditing;
- ensuring, in case the LTW is in charge of conducting WMT under the responsibility of the LCB, there is a signed agreement between the LCB and the LTW;
- execution of a signed agreement (e.g. Annex C) defining the scope of the LTW and enabling his/her activities;
- registration of the LTW with the LOVAG Secretary, and maintenance of the current details in the register;
- issue of LOVAG Certificates and LOVAG Mark licences including the use of LTWs;
- accepting the liability issues that may arise because of the LTW work.

The LCB to whom the manufacturer has made application is responsible for:

- ensuring that all personnel involved in witness testing are trained on an ongoing basis in:
 - procedures which apply to WMT in the LOVAG Scheme;
 - relevant LOVAG laboratory practices and LOVAG testing procedures;
- having appropriate procedures and documentation for the operation of WMT program;
- review of documentation held by the LTW performing WMT covering the assessment of the WMTL facilities and the WMT contractual arrangements;
- ensuring that there is written agreement directly between the LCB and its WMTLs;
- registration of the laboratory as a WMTL with the LOVAG Secretariat, and the maintenance of the correct and current details in the register;
- reviewing and signing the LOVAG test report;
- issuing LOVAG Certificates and LOVAG Mark licences based on WMT.

The following responsibilities can be delegated by the LCB to one of its LTWs

- ongoing supervision and monitoring of the WMT;

3.2 **Responsibilities and requirements of the LTW:**

The LTW is authorized to work for multiple LCBs.

As an LTW may be responsible for witnessing for WMT under the responsibility of a LCB, he is responsible for:

- operating in compliance with all relevant requirements of ISO/IEC 17025 and the LOVAG Schemes requirements, procedures and decisions;
- operating with the procedures and working instructions of the responsible LCB regarding the use of manufacturers' test laboratories;
- maintaining technical competency for the specified scope of work (as per Annex B) within the accepted scope of the LCB;
- providing evidence of his competence through technical study (electrical engineering) or comparable qualification
- providing evidence of professional experience within test laboratories and in the field of low-voltage switching devices
- providing evidence of knowledge: switching devices and the functionality of low-voltage switching devices; test laboratories; measurement equipment and analysis of measurement uncertainties
- providing evidence to be able to interpret relevant standards reliably,
- providing evidence to be able to explain the test requirements and to discuss detailed technical issues
- providing evidence of more than 5 years working experience or similar experience in the field to be witnessed
- Providing evidence can be fulfilled e.g. by the curriculum vita
- maintaining accurate documentation regarding his/her technical competency and experience for the responsible LCB and informing the responsible LCB about any change in status;
- completing an agreement (see Annex C for example) with the responsible LCB to enable status as LTW;
- ensuring that all use of manufacturers' test laboratories is carried out in accordance with the procedures of the responsible LCB;
- not being affiliated with, nor consulting nor influenced or controlled, by the manufacturers or suppliers;
- taking necessary steps, when LTW is an Independent Individual (see Annex D), to demonstrate reasonable insurance coverage;
- conducting initial assessment of a Manufacturer Testing Laboratory, on request of the LCB, only if employed within the same corporate structure of the LCB.

These responsibilities cannot be delegated or subcontracted by the LTW to anyone.

3.3 **Responsibilities of the WMTL:**

The manufacturer's laboratory used for Witness Testing is responsible for:

- demonstrating that the facilities are in compliance with all relevant requirements of ISO/IEC 17025 and the LOVAG Schemes' requirements;
- appointing an appropriate person to be responsible for the WMT facilities and operations;
- ensuring that all tests are carried out in accordance with the applicable technical requirements and the instructions of the witnessing personnel;
- signing the test report under "Responsible of the Test Laboratory".

4. Reference Documents

- The following documents apply to the general arrangements for the use and operation of manufacturers' test laboratories:
 - Low Voltage Agreement Group (LOVAG) - Rules of the Agreement
 - **LOVAG General Instructions**
- The following requirements apply to the assessment and auditing of LTWs:
 - ISO/IEC 17025: General Requirements for the Competence of Testing and Calibration Laboratories;
 - **ISO/IEC 17065: Conformity Assessment – Requirements for bodies certifying products, processes and services.**

5. Supervision and Monitoring of LTW Operations

- **Samples for Examination:**

The LCB shall be entitled to request, as appropriate, an actual product sample for examination as part of on-going audit/review/oversight process of the test reports completed by the LTW;

- **On-Site Supervision at the Manufacturer's Test Laboratory;**

On at least an annual basis, the LCB is responsible to carry out some WMT program activities together with the LTW. To demonstrate competency for WMT auditing is acceptable as appropriate.

6. Procedures for Witness Testing

- The LCB performing WMT shall have ISO/IEC 17025 Quality Management System Procedures covering all aspects of working off-site, including:
 - initial assessment and periodic auditing of suitability of the manufacturer's staff, test facilities and test equipment in accordance with the relevant requirements of ISO/IEC 17025, in particular:
 - competence of the WMTL staff who perform the tests (ISO/IEC 17025 Cl. 5.2),
 - control of environmental conditions at the laboratory (Cl. 5.3),
 - stability and capacity of power supplies (Cl. 5.3),
 - availability of acceptable test equipment (Cl. 5.5),
 - test equipment calibration (Cl 5.6.2.2).
 - arrangements for periodic auditing of its own off-site operations
- The WMT agreement shall, as a minimum, cover:
 - the facilities and services being supplied by the manufacturer's laboratory;
 - use of data generated, including laboratory records;
 - the supervisory role of the witnessing staff, and the right to audit and/or re-assess the facilities.

7. Conduct of Witness Testing

Under WMT, testing is carried out by the manufacturer's personnel but full responsibility for the testing rests with the witnessing entity. The LTW shall be present whenever tests are conducted, and shall supervise, check, and witness all critical aspects of the tests. This includes but is not limited to:

- preparing a product test plan and providing it to the manufacturer's laboratory;
- checking the test set-up, instrumentation and the relevant equipment calibration;
- directing proper placement and attachment of thermocouples;
- witnessing the final data acquisition or read-out and conducting its validation where necessary.

8. Notification to the LOVAG Secretariat

- A LCB wishing to register a WMTL for recognition within the LOVAG Scheme shall inform the LOVAG Secretariat by submitting a completed Annex A of this OD and confirming that records of assessments are available for scrutiny. The LCB shall also inform the LOVAG Secretariat when the agreement with the WMTL changes or if it is cancelled.
- The LOVAG Secretariat shall keep the record updated giving details of WMTL facilities registered within the LOVAG Schemes and operating in accordance with this OD.
- The LCB shall register all LTW Agreements by submitting a completed version of Annex B to the LOVAG Secretary and confirming that records of LTWs qualifications are available for scrutiny if required. The LCB shall inform the LOVAG Secretary whenever an LTW Agreement changes, in that event Annex B shall be updated, or if it is cancelled.
- The LOVAG Secretary shall keep the record duly updated giving details of LTWs accepted within the LOVAG Scheme and operating in accordance with the LOVAG Procedure.

9. Agreement between LCB and LTW

The LCB shall sign an agreement with the LTW. An example of such an agreement is given in Annex C.

10. Conditions concerning Choice of LCB

- An WMTL shall be permitted to participate in the LOVAG Schemes for more than one LCB in the same product category, if the first (responsible) LCB gives his agreement.
- An WMTL shall not be permitted to participate in the LOVAG Schemes for more than one LCB for the same product model
NOTE: an WMTL shall not be permitted to address a LOVAG test report for the same model to more than one LCB.
- LCB responsibilities including supervision and traceability requirements shall be applied independently by each LCB

11. LOVAG Test Reports and LOVAG Certificates

- LOVAG Test reports prepared using WMT shall use the relevant LOVAG Test Report Forms and shall be signed by:
 - WMTL qualified tester who carried out the testing - under “Competent person, who performed the tests”;
 - Laboratory Manager of the WMTL – under “Responsible of the Test Laboratory”
 - LTW - under “Authorized Representative of LOVAG Certification Body”
- LOVAG Test Reports prepared using WMT shall record the name and address of the manufacturer's laboratory used, and indicate what tests have been carried out by the manufacturer.
- When LOVAG Certificates or LOVAG Mark licences are based on WMT, the LOVAG Test report has to be reviewed and stamped “Approved by” and signed by the LCB.

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ANNEX A

LOVAG Scheme

Use of a Manufacturer's Testing Laboratory under the WMT Procedure

Report to the LOVAG Secretariat

LCB: _____ **Report Ref:** _____

Date: _____

Name: _____

Sign: _____

WMTL using the Manufacturer's Facility

Name: _____

Address: _____

Date of initial agreement: _____ Name: _____

Latest revision of agreement: _____ Sign: _____

Manufacturer's Test Laboratory

Name: _____

Address: _____

Standards/Tests covered by the Agreement

IEC STANDARD	Tests Covered (by clause number)
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Annex B

**Certification of Electrical Equipment
LOVAG Schemes**

LCB - LTW Report to the LOVAG Secretary from LCB

LCB

Organization: _____

Address: _____

Country: _____ Representative: _____

Date of initial "LTW Agreement": _____

Latest revision of "LTW Agreement": _____

Products/Standards covered by the Agreement

Product Category	IEC STANDARD(s)	Product(s) Covered

All product categories and standards are within the scope of the LCB

LTW

Name: _____

Address: _____

Country: _____

Legal Registration Number (If applicable. see § 2.1) _____

Records of qualifications of the LTW are available for scrutiny if requested

Annex C

Example of "LTW Agreement (concerning the LTW's activities on behalf of the LCB).

The agreement between the LTW and the LCB concerning the use of the WMTL shall specify at least:

Between

.....

LTW

And

.....

-LCB

Preamble:

This agreement regulates the activities of the LTW within the LOVAG Scheme under the supervision and control of the LCB. It is renewed and / or amended whenever the scope of the LTW's activities needs to be revised to cover additional, or reduced, Manufacturers' Testing Laboratory program.

LTWs possess the technical and procedural knowledge to handle the operational activities in the LOVAG Scheme including WMT. The relevant OD's of the LOVAG Scheme as well as in the relevant quality procedures of the LCB which apply to all LTWs of the LCB. Therefore, these procedures, as appropriate, are integral parts of this agreement and any updated version will become an integral part.

LOVAG Operational Procedures for Manufacturers' Testing

Low Voltage Agreement Group (LOVAG) - Rules of the Agreement.

Agreement:

This agreement is implemented to fulfill the requirements of the procedures in the LOVAG Scheme for the LTW and outlines the essential requirements as demanded by the operational units and the certification body as well as by the accreditation body.

1. The LTW will act under the supervision of the LCB. As applicable to the relevant WMTL procedure/s the LTW will act on behalf of the LCB for WMT. The LTW has the technical and formal competence to take responsibility for handling of the procedures in his/her area of responsibility.
2. The LCB is obliged to inform the LTW about any changes of relevant procedures as well as to provide any information and/or training needed to perform the duties as LTW.
3. The LTW shall keep all information acquired in the course of LTW activities strictly confidential and will not disclose it to any third person or legal entity that is not entitled to receive such information.
4. LTWs are registered and listed at the LCB. This list shall be made available during the peer assessment of the LCB
5. The LTW appointment and this agreement can be cancelled by the LCB at any time.
6. It shall be stated that the Low Voltage Agreement Group (LOVAG) - Rules of the Agreement is a part of the agreement.

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LTW

Name: _____

Address: _____

Country: _____

Legal Registration Number (If applicable. see § 2.1) _____

Signature of LTW _____ Date: _____

N LCB

Organization: _____

Address: _____

Country: _____ Representative: _____

Signature of Representative: _____ Date: _____

ANNEX D			
Permitted and not-permitted, Combinations			
Responsible entity	Combination	Person is employed by	Conditions and Status
LCB-1	LCB-1 wishes to use a person employed by :	A third Party, Independent Testing laboratory, in the LOVAG	YES this is Permitted and an LTW Agreement is needed
		A first party related organisation	
	LCB-1 wishes to use a person employed by :	A Manufacturer	This is NOT Permitted due to potential conflicts of interests that may impact impartiality.
		An Independent Individual	
	NCB-1 wishes to use an Independent Individual	When working solely for LCB-1 under contract NB : This Independent Individual shall be locally legally registered	YES this is Permitted for WMT and an LTW agreement is needed ; This person has to follow the operating rules and procedures of the LCB-1 that is responsible for the full application of : Low Voltage Agreement Group (LOVAG) - Rules of the Agreement