

	OPERATIONAL DOCUMENT	ECS 032
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**Use of Customers' Testing Facilities
in the European Certification Schemes (E-CTFs)**

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1. Objective

Many manufacturers who use the ECS Schemes have capable testing laboratories in terms of personnel, facilities and equipment, for testing the types of product for which they have responsibility for design, development and production.

In recognition of the market needs to utilise these facilities, procedures have been established for obtaining Notification of Test Results (NTRs) or Marks, such as ENEC and HAR, under controlled conditions. These procedures can be an alternative to testing at a TL.

2. Terms and References

Customer's Testing Facility used in the European Certification Schemes (E-CTF): An E-CTF is a Customer's Testing Facility owned by a "Manufacturer" who has full responsibility for ensure continuous compliance with the relevant requirements of EN ISO/IEC 17025, ECS, all applicable Scheme Operational Documents and OSM decisions.

Testing Laboratory (TL): A laboratory independent of manufacturing interests that has been recognised within an ECS Scheme to test specified categories of products and to issue Test Reports.

The following documents apply to the general arrangements for the E-CTF (see Note 1):

- EN ISO/IEC 17025: 2017
- EN ISO/IEC 17065: 2012
- IECCE OD 2048: 2021
- IECCE OD 5004: 2021
- Applicable ECS ADs, PDs and ODs
- Applicable ENEC, CCA and HAR PDs and ODs
- Applicable OSM Decisions

Note 1: The use of acronym "E-CTF" alone, without specifying "European Customer's Testing Facility" reflects the fact that an E-CTF may be located outside Europe.

3. Principles

The rules laid down in IECEE document OD-2048 including IECEE OD-5004 for Proficiency Testing Programs (available on www.iecee.org) apply to the European Certification Schemes with the exception and the limitations listed below:

- Throughout the document the listed acronyms shall be read as follows:

NCB	CB
CBTL	TL
CTF	E-CTF
IECEE	ETICS
CBTC	Notification Test Results (NTRs) or European certificates of ECS Schemes, like ENEC, HAR, etc.
CBTR	TR (European Test Reports – see structure on OD ECS 040)
Group Differences	European Group Differences
- For Stage 3 it is not necessary to witness parts of each individual project performed by the E-CTF, but all the testing needs to be witnessed over time to get the ensure that the tests are executed in the correct way. The decision is left to the CB's appreciation depending on the results of the CTF-3 activity (assessments and reviewed tests) to which extend the supervision is needed. During assessments of the CB, strong control and supervision of the CTF-3 stage must be shown with sufficient surveillance executed.
- Stage 4 is not applicable to the European Certification Schemes.
- LTR is not allowed in the European Certification Schemes.
- Forms associated with OD-2048 and documents for use in Assessments of E-CTFs (sub-clause 2.2 and 4.3 of OD-2048):
 - OD ECS 032-F1: Example of an E-CTF Activity Report;
 - OD ECS 032-F2: E-CTF Assessment Report Summary; (See also Note 2)
 - AD ECS 072: Check List for Testing Laboratories as a guidance and for Stage 3 only
- The ETICS Secretariat maintains and publishes a register of those manufacturers participating and the relevant standards involved. This document is referenced AD ECS 036 and is accessible on the “ECS Public Documents” area of the website.

Note 2: The European standards/clauses relevant for the E-CTF status in the European Schemes shall be listed in Annex 1A and/or Annex 1B of IECEE OD-2048-F2-2 / IECEE OD-2048-F3-2 which are attached to this E-CTF Assessment Report Summary.

Annex A - Table of Comparison of Programmes for TL, E-CTF Stage 1, E-CTF Stage 2, E-CTF Stage 3

Laboratory Type	TL	E-CTF Stage 1	E-CTF Stage 2	E-CTF Stage 3
Testing Location	TL	Manufacturer	Manufacturer	Manufacturer
Definitions (who is doing the work)	A laboratory successfully assessed within a ECS Scheme performs all necessary tests with own equipment in own facilities	A representative of an accepted TL, under the responsibility of its CB performs the full test in a manufacturer's laboratory with its own or the manufacturer's equipment	A representative of an accepted TL, under the responsibility of its CB witnesses all tests done by a manufacturer's laboratory which uses its own equipment	A representative of an accepted CB or an accepted TL, on request of an CB, supervises the quality management system and the laboratory testing processes and witnesses, if any, some part of each agreed testing program at a manufacturer's laboratory, which uses its own equipment.
Signature: Tested by *	TL	TL	Manufacturer	Manufacturer
Signature: Witnessed by *	none	none	CB or TL	CB or TL
Signature: Authorised (Reviewed and Approved) by *	TL	TL	CB or TL	Manufacturer
Signature: Supervised by *	none	none	none	CB or TL by delegation
Signature: NTRs or Mark Licence	CB	CB	CB	CB
Presence at each individual project	Yes (100 %)	Yes (100 %)	Yes (100 %)	not necessary to witness each individual project, but all the testing needs to be witnessed over time

Laboratory Type	TL	E-CTF Stage 1	E-CTF Stage 2	E-CTF Stage 3
Equipment Requirements	Fully equipped to category(ies) / standard(s) except for allowed subcontracting identified as “s” in the IECCE CTL Equipment Lists	Fully equipped to category(ies) / standard(s) / part(s) of standard(s)	Fully equipped to category(ies) / standard(s) / part(s) of standard(s)	Fully equipped to category(ies) / standard(s) / part(s) of standard(s)
Initial / Annual / Scope Extension / Follow up / Re-Assessments / Re-Location Assessments	ECS Peer Assessment Programme	Assessment by CB or by a representative of an accepted TL, on the request of a CB, based on OD-ECS-035 within scope of arrangement	Assessment by CB or by a representative of an accepted TL, on the request of a CB, based on OD-ECS-035 within scope of arrangement	Assessments by CB, or by a representative of an accepted TL, on the request of the CB, based on OD-ECS-035 within scope of arrangement
Relationship between CB and operator of laboratory	Ownership or technical control contract with one or more CB(s) in different product category(ies) according to PD ECS 050 and EN ISO/IEC 17065. A TL shall not operate in the same product category for more than one CB.	E-CTF Stage 1 shall not be permitted to participate for more one CB for the same product model. Agreement with more than one CB is possible.	E-CTF Stage 2 shall not be permitted to participate for more one CB for the same product model. Agreement with more than one CB is possible.	E-CTF Stage 3 shall not be permitted to participate for more one CB for the same product model. Agreement with more than one CB is possible.
Agreement between CB, TL and E-CTFs	An agreement between CB and TL(s) is required if they are different legal entities	An Agreement between CB, E-CTF Stage 1 and TL is required (See OD-ECS-035)	An Agreement between CB, E-CTF Stage 2 and TL is required (See OD-ECS-035)	An Agreement between CB, E-CTF Stage 3 and TL is required (See OD-ECS-035)
Registration of the E-CTFs	List of TLs associated to a CB for the different agreements	Yes	Yes	Yes
Supervision / Training (CBs are involved) Required (may be coordinated when multiple CBs are involved)	Through the responsible CB(s) according to scope of operation	Through respective responsible CB(s)	Through respective responsible CB(s)	Through respective responsible CB(s)

Laboratory Type	TL	E-CTF Stage 1	E-CTF Stage 2	E-CTF Stage 3
Participation in CMC Meetings	Yes, through Member Body representation	No	No	No
Participation in CTL/OSM Meetings	Yes	On voluntary basis	On voluntary basis	On voluntary basis
Participation in IECEE Proficiency Testing Program	Required	Not required under the IECEE CTL PTP programme, required under the responsibility of the relevant CB	Not required under the IECEE CTL PTP programme, required under the responsibility of the relevant CB	Required (may be coordinated when multiple CBs are involved)
*NB: Signing persons shall be chosen appropriately in order to avoid any conflict of interest.				