



SUB-CONTRACTING OF TESTING ACTIVITIES

A **SUB-CONTRACTOR** is defined as “a supplier to a service organization in a contractual situation.

This document is aimed at to provide the basic principle of subcontracting and borrowing/renting Testing equipment by CBTLs under the CB Scheme.

The CTL has been assigned by the CMC with the task to originate the relevant "LIST" containing Testing/Measuring Equipment that are Required (R) to be available within the CBTL facilities as well as the Testing/Measuring Equipment that are allowed for sub-contracting and/or Borrow or Renting (S).

FACTS:

- 1) ISO/IEC 17025 and Guide 65 permit sub-contracting under certain conditions among which the sub-contractor shall be subjected to the same requirements as the candidate CBTL.
- 2) IECEE has approved LISTS of allowed sub-contracting/borrowing/renting (S) that have to be followed by the NCBs/CBTLs operating within the Schemes.
- 3) IECEE has agreed and approved the general principle and spirit of Sub-contracting to cover "well founded reasons".

The above requirements and Operational Documents shall be followed by every Member or Candidate, however, one shall be aware that other well founded reasons may arise which should be considered on a case-by-case basis.

As an example of “well-founded reasons”:

- A) The CBTL is either sub-contracting some tests to another CBTL (which might be of the same Group at a different location)
- B) The CBTL covers a limited scope of the standard.
Examples: IEC 60065 and IEC 60950 that are covering a huge number of products.

In such cases one could feel that investments in expensive test equipment for which there is no market demand is unrealistic.

However, one basic principle always apply:

"Subcontracted tests shall be compatible with the type test sequence determined by the standard".



IEC System for Conformity Testing and Certification of Electrotechnical Equipment and Components CB Scheme

Example: A dielectric strength test cannot be subcontracted if the test is relative to the requirement of clause 15 of IEC 60335-1. As a matter of fact the Dielectric Strength Test shall immediately follow the IP test and therefore these two testing cannot be dissociated.

General Principles

Every CBTL, under the responsibility of its Certification Body, shall have all testing devices and facilities to cover the requirement of the relevant product's Standard.

However, in exceptional cases when well founded reasons prevail, i.e. Special test equipment, which is hardly ever needed for testing, it may be accepted that some testing, be **subcontracted** or **borrowed/rented**.

Subcontracted test

- The Candidate Testing Laboratory and the Subcontractor shall have a duly established Agreement.
- **The shipment of the sample to the Subcontractor, irrespective to the distance and location, shall be such that appropriate provisions are taken to prevent any alteration to the sample or product that may affect the testing/measuring integrity. In addition the CBTL shall have a documented procedure as part of the QMS covering the subcontracting provisions for the shipment conditions**
- The subcontracted test(s) shall be compatible with the type test sequence determined by the standard(s).
 - i.e. Humidity test cannot be subcontracted due to the fact that the safety electrical tests which follows the humidity tests shall be performed immediately after, for instance, the splash proof test.
- The Candidate Testing Laboratory shall exercise full control over the subcontractor in accordance with the relevant standard, ISO/IEC 17025. (By performing Audits and checking the qualification of the equipment and its operator).
- **The CBTL shall ensure and document how their subcontractor are initially qualified and how the on-going validation is maintained**
- The Assessment Team might decide to extend the assessment at the subcontractor location not only to make sure that the testing device(s) meets the technical criteria but also to ensure that the relevant subcontracted test(s) is (are) performed with the appropriate expertise and competence. However this resolution is subject to prior consultation with and subsequent agreement of the IECCE Secretary.

BORROWED / RENTED:

- The Candidate Testing Laboratory and the Borrowing/Renting Company shall have a duly established Agreement/Contract.
- The Candidate Testing Laboratory shall take appropriate provision to an extent that the transportation of the Borrowed/Rented equipment will not affect the correct functioning of the equipment.
- The Assessment Team shall verify the competence of the Laboratory Staff to properly use such equipment as well as the appropriateness of the testing/measuring equipment with respect to the standard's requirement.
- **In exceptional cases, when it is impractical to ship the borrowed or rented equipment to the CBTL facilities, i.e. extra size of humidity chamber, it is permitted that the CBTL staff carries out the relevant testing/measuring at the facility of the borrowed/rented company.**