



**IECEE OD-2034**

~~Edition 5.4 2017-05-17~~ Edition 5.5 2018-06-05

# **IECEE OPERATIONAL DOCUMENT**

**IEC System of Conformity Assessment Schemes for Electrotechnical Equipment and Components (IECEE System)**

**Operation of a Local Technical Representative (LTR) for the IECEE CTF Program**





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## FOREWORD

**Document Owner**

CMC WG 3 "Utilization of Customers' Testing Facilities"

**History of changes**

<b><u>Revision</u> Date</b>	<b>Brief summary of changes</b>
<u>2018-02-06</u>	<p><u>The contents of following sub-clauses have been updated: 2, 3.5, 4.1(e)(f)(g)(h)(j) and (k), 4.2(a), 4.3, 4.3.2, 4.3.3, 5.4.1, 6.1(a), 6.2(b), B.2, Annex C.</u></p> <p><u>The following sub-clauses have been added: 4.3.3</u></p> <p><u>The following sub-clauses have been deleted: 2.1 to 2.6, 4.4.2, Annex B form (replaced by OD-2034 F1)</u></p>
2017-02-09	<p>Deleted Annex A</p> <p>The contents of following sub-clauses have been updated: 4.3.2, 6.3, 7.1, Annex B</p> <p>The following sub-clauses have been added: 1.4</p>

<b>Effective date</b>	<b><del>Target revision</del> <u>Next maintenance due</u> date</b>
<del>2017-05-17</del> <u>2018-06-05</u>	<del>2020-05-17</del> <u>2021-06-05</u>

## 1 Introduction

1.1 General principles covering the use of customers' testing facilities in the IECEE scheme are given in OD-2048.

1.2 The purpose of this OD is to provide a process to utilize qualified technical staff to carry out CTF testing under the responsibility of the NCB by providing local testing services at the manufacturer's laboratory.

1.3 [Annex C](#) shows permitted and not-permitted, combinations.

1.4 Forms associated with OD-2034:

- a) OD-2034-F1: NCB LTR Report to the IECEE Secretariat

## 2 Definitions

Refer to document "IECEE Definitions"

### ~~1.1 Local Technical Representative (LTR)~~

~~A specified, competent person, operating under the responsibility of a NCB, who locally carries out the required CTF activities according to OD-2034 and OD-2048, as applicable.~~

### ~~1.2 Local Entity~~

~~A local entity is an organization which supports the operation of LTRs, where relevant. The Local Entity is independent from any Manufacturer, Manufacturer's agent or agency.~~

### ~~1.3 Independent LTR~~

~~An independent LTR is a person which is not employed by the NCB or its CBTLs and is operating in accordance with [Annex C](#). This person has an LTR agreement with the NCB and is operating according to this OD. See [Annex C](#).~~

### ~~1.4 Employee LTR~~

~~An employee LTR is a person employed by the NCB or CBTL under same corporate structure and operating in accordance with [Annex C](#).~~

### ~~1.5 External LTR~~

~~It is a person employed by a CBTL outside of the corporate structure of its NCB, and operating in accordance with [Annex C](#). This person has an LTR agreement with the NCB~~

### ~~1.6 Tutor CBTL~~

~~It is a CBTL responsible for the initial qualification and the on-going technical competence of a LTR, in specific product categories and standards.~~

## 2.3 General requirements for operation of LTRs

3.1 A LTR is either:

- a) Stationed remotely from its NCB and its associated CBTL(s), or
- b) Stationed at a CBTL but operating outside the scope of that particular CBTL.

3.2 The LTR is allowed to operate with multiple NCBs and/or CBTLs only when the NCBs and CBTLs are within the same corporate family.

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**3.3** CTF Stage 1 activities are always conducted on behalf of the CBTL with the appropriate scope.

**3.4** The IECEE Secretariat, in consultation with the Lead Assessor and the assessed Body, determines when, where and how (e.g. in-person, by telephone or teleconference interview, etc.) an LTR's participation in the assessment is necessary.

**3.5** Except for Employee LTRs, an LTR Agreement with the NCB is required. See [clause 8](#).

## **3.4 Responsibilities**

### **3.4.1 Responsibilities of the NCB**

The NCB is responsible for:

- a) Selection and designation of the LTR;
- b) On-going supervision and monitoring of the LTR;
- c) On-going training of the LTR in the procedures and operation of the CB Scheme;
- d) Qualification of both the initial and on-going technical competence of the External LTRs and Independent LTRs through assessments;
- e) Appointing one or more of its CBTLs to act as "tutor CBTLs" to the LTR to maintain the LTR's technical competency. Only one CBTL can act as a tutor for an Independent LTR and External LTR ~~in one product category~~ [for a standard](#);
- f) Ensuring, in case the LTR is in charge of conducting CTF Stages 2, 3 or 4 activities are under the responsibility of the NCB, ~~that~~ there is a signed agreement between the NCB, the Independent LTR or External LTR, and the Local entity (if any);
- g) Execution of an agreement (~~(See Annex B~~ [See clause 8](#)) defining the scope of the Independent LTR or External LTR and enabling his/her activities;
- h) Ensuring, in case the LTR is in charge of conducting CTF Stage 1 activities on behalf of ~~a~~ CBTL having the appropriate scope under the responsibility of the NCB, that there is a signed agreement between the NCB, the Independent or External LTR ~~and~~ the involved CBTL;
- i) Ensuring that there is a procedure in place defining the LTR process and related responsibilities;
- j) Registration of the [External LTRs and the Independent LTRs](#) with the IECEE Secretary, and maintenance of the current details in the register;
- k) Maintaining records of all LTRs and making ~~them~~ [it](#) available ~~on request during the for~~ [IECEE assessments](#);
- l) Issue of CB Test Certificates including the use of LTRs;
- m) Operating as detailed in OD-2048;
- n) Accepting the responsibilities that may arise from the LTR work;
- o) Ensuring that the CBTR is reviewed and accepted by the CBTL according to clause 5 in OD-2048.

The following responsibilities can be delegated by the NCB to one of its CBTLs:

- p) On-going supervision and monitoring of the LTR;
- q) Qualification of both the initial and on-going technical competence of the LTR through assessments.

Note: Occasionally, the NCB may take some or all responsibilities of the Local Entity.

### **3.24.2 Responsibilities of the Local Entity**

The Local entity is responsible for:

- a) Execution of a signed agreement ~~(See Annex B)~~ (See clause 8) defining the scope, where relevant, of the LTR and enabling his/her activities;
- b) Providing the facilities and resources to support the LTR;
- c) Ensuring that the LTR maintains accurate documentation regarding his/her technical competency and experience;
- d) Not to be affiliated with, nor consulting for, nor influenced or controlled, by the manufacturers or suppliers;
- e) Taking appropriate steps for LTRs under his/her responsibility to demonstrate adequate insurance coverage;
- f) For an Independent LTR (see also Annex C), all above responsibilities shall be assumed by the responsible NCB;
- g) Facilitating on-site responsibilities of the NCB (e.g. administrative support).

### **3.3 Responsibilities of the LTR**

#### **3.4 Responsibilities of the LTR, when under the responsibility of a NCB**

##### **3.54.3 The LTR is responsible for:**

- a) conducting testing at CTF Stage 1;
- b) witnessing testing at CTF Stages 2, 3 and 4;
- c) supervising CTF Stages 3 and 4;
- d) conducting initial and follow up assessments of CTFs;
- e) conducting CTF activities.

##### **3.5.14.3.1 Responsibilities of all LTRs**

All LTRs are responsible for:

- a) operating in compliance with all relevant requirements of ISO/IEC 17025 and the IECEE CB Schemes requirements, procedures and decisions;
- b) operating with the procedures and working instructions of the responsible NCB regarding the use of customers' testing facilities, (procedures related to the specific stages are detailed in OD-2048, as applicable);
- c) maintaining a permanent link to an appointed "tutor CBTL" in order to keep the technical competency for the specified scope of work (as per OD-2034-F1) within the accepted scope of the NCB, including familiarity with all applicable CTL decisions;
- d) The "tutor" CBTL's" address shall be used on the TRF signature section (as opposed to the private address of the LTR or its responsible Local Entity);
- e) maintaining accurate documentation regarding his/her technical competency for the responsible NCB and informing the responsible NCB about any change in status;
- f) ensuring that all use of customers' testing facilities is carried out in accordance with the general principles of OD-2048, as applicable, as well as with the procedures of the responsible NCB;
- g) being available, as appropriate, to be assessed under the peer re-assessment program pertaining to the responsible NCB as requested in advance by the Lead Assessor of the Peer Assessment Team;
- h) not being affiliated with, not consulting for, nor influenced or controlled, by manufacturers or suppliers.

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

### ~~3.5.2~~ ~~Responsibilities of the Employee LTR~~

~~The Employee LTR is additionally responsible for conducting initial assessment of an CTF, on request of the NCB.~~

### ~~3.5.3~~ ~~4.3.2~~ **Additional responsibilities of the Independent LTR**

The Independent LTR is additionally responsible for:

- a) completing an agreement with the responsible NCB (See clause 8 and Annex B for an example)
- b) accepting on site supervision upon request of the responsible NCB (See conditions in Sub-clause 5.2)
- c) taking necessary steps, to demonstrate reasonable insurance coverage

### ~~3.5.4~~ ~~4.3.3~~ **Additional responsibilities of the External LTR**

The LTR from an external CBTL is additionally responsible for completing an agreement with the responsible NCB and a Local Entity (e.g. an external CBTL), see clause 8 and Annex B for an example.

## **4.5 Supervision, Monitoring and Assessment of LTR Operations**

### **4.4.5.1 Samples for Examination**

The NCB shall be entitled to request, as appropriate, an actual product sample for examination as part of on-going assessment/review/oversight process of the test reports completed by the LTR.

### **4.2.5.2 On-site supervision of Independent LTRs at the Customers' Testing Facilities**

On at least an annual basis, the NCB is responsible to carry out some CTF program activities together with the "Independent LTR".

This responsibility may be delegated to a CBTL by the NCB.

The NCB shall verify the competency of the Independent LTR for performing tests (CTF Stage 1) or witnessing test (CTF Stages 2 to 4) and accepting test results, by observing these activities conducted by the LTR, as appropriate.

The NCB shall verify the competency of the Independent LTR for conducting the assessment of CTF (e.g. according to OD-2048) by observing these assessments conducted by the LTR, as appropriate.

### **4.3.5.3 Supervision of Employee LTRs and External LTRs**

The competence of Employee LTRs and External LTRs is covered by the Quality Management System of the CBTL and NCB, and may be assessed in the same manner as the competence of other NCB/CBTL staff.

### **4.4.5.4 IECEE Assessment of LTR Competence**

**5.4.1** IECEE Assessment of the NCBs and CBTLs will include the evaluation of the competence of the LTRs by either face-to-face, telephone or videoconference interviews.

The decision to carry out assessments for remotely stationed LTRs will be made in advance between the Lead Assessor and the IECEE Secretariat, and will be communicated to the assessed organization at least two months before the assessment per OD-2007.



Note: As in any IECEE Peer Assessments, an assessment of LTRs is to be done on a sampling basis.

**5.4.2** The assessment team shall make a professional judgment based upon:

- a) CV information, including:
  - formal education;
  - previous positions and responsibilities with time in each role, and training programs completed;
  - assessment of previous experience of the LTR in previous employment.
- b) interviews of the LTR regarding:
  - awareness and detailed knowledge of the requirements in the relevant standards;
  - awareness and detailed knowledge of the relevant IECEE ODs;
  - the content of specific Test Reports selected by the Assessment Team.
- c) witnessing of test carried out by the LTR when the LTR is available at the site of the assessment.

## **56** References and general provisions

**6.1** The following documents apply to the general arrangements for the use and operation of customers' testing facilities:

- a) OD-2048 [Utilization of Customers' Testing Facilities \(CTFs\)](#). ~~Third-Party Utilization of Customers' Testing Facilities~~

**6.2** The following requirements apply to the assessment of LTR's activities:

- a) ISO/IEC 17025, General Requirements for the Competence of Testing and Calibration Laboratories;
- b) ~~ISO/IEC Guide 65, General requirements for bodies operating product certification systems or~~ ISO/IEC 17065, Conformity assessment - Requirements for bodies certifying products, processes and services;
- c) Relevant IECEE Operational Documents.

**6.3** The following documents apply to operation of the NCB:

- a) ISO/IEC 17065;
- b) IECEE 02 and relevant IECEE ODs.

## **67** Notification to the IECEE Secretariat

**7.1** The NCB shall register all Independent LTRs and External LTRs (See [Annex C](#)) by submitting a completed version of OD-2034-F1 to the IECEE Executive Secretary and confirming that records of LTRs qualifications are available for scrutiny if required.

The NCB shall inform the IECEE Executive Secretary whenever a LTR Agreement changes, in that event OD-2034-F1 shall be updated, or if it is cancelled.

**7.2** The IECEE Secretariat shall keep a duly updated record of all registered LTRs.

## **78** Agreement between NCB and Independent LTR or External LTR

The NCB shall sign an agreement with Independent LTRs and External LTRs. An example of such an agreement is given in [Annex B](#).

In order to facilitate the application of this OD, the above agreement shall be signed also by a representative of the Local Entity, where applicable, or by the Independent LTR alone.

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In case a CBTL acts as the Local Entity, the above agreement shall be signed also by a representative of the CBTL.

**Annex A VOID**

## Annex B Example of an LTR Agreement

This is an example for an agreement concerning the LTR's activities on behalf of the NCB.

The Agreement shall specify at least the three Parties concerned: LTR, NCB and Local Entity/ CBTL

### B.1 Preamble

This agreement regulates the activities of the LTR within the CB Scheme under the supervision and control of the NCB. It is renewed and / or amended whenever the scope of the LTR's activities needs to be revised to cover additional, or reduced, CTF stages.

LTRs possess the technical and procedural knowledge to handle the operational activities in the CB Scheme including CTF Stages 1 to 4, as appropriate. These systems are described in IECEE 02, the relevant OD's of the CB Scheme as well as in the relevant quality procedures of the NCB which apply to all LTRs of the NCB. Therefore, these procedures, as appropriate, are integral parts of this agreement and any updated version will become an integral part.

### B.2 IECEE Operational Documents for CTF programs

OD-2048 [Utilization of Customers' Testing Facilities \(CTFs\)](#)~~Third Party Utilization of Customers' Testing Facilities~~

### B.3 Agreement

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

**B.3.1.** The LTR will act under the supervision of the NCB. As applicable to the relevant CTF procedure(s), the LTR will act on behalf of the NCB for CTF Stages 2 to 4. For CTF Stage 1 (where permitted: see [Annex C](#)) and for CTF Stage 2 (when relevant) the LTR may act, by delegation of the NCB, on behalf of the accepted CBTL. The LTR has the technical and formal competence to take responsibility for handling of the procedures in the LTR's area of responsibility.

**B.3.2.** The NCB is obliged to inform the LTR about any changes of relevant procedures as well as to provide any information and/or training needed to perform the duties as LTR.

**B.3.3.** The LTR shall keep all information acquired in the course of LTR activities strictly confidential and will not disclose it to any third person or legal entity that is not entitled to receive such information.

**B.3.4.** LTRs are registered and listed at the NCB. This list shall be made available during the peer assessment of the NCB

**B.3.5.** The LTR appointment and this agreement can be cancelled by the NCB at any time.

**B.3.6.** It shall be stated that the OD-2034 is a part of the agreement.

**B.3.7.** The Independent LTR or External LTR agrees that the LTR's name and office address is displayed on IECEE Website.

Comment [tsm1]: Removed by Secretariat, as replaced by OD-2034 F1

<b>LTR</b>	
Business name (if applicable)	
Office address	
Country	
Legal registration number (for Independent LTR)	
Signature of the LTR	
Date	

<b>NCB</b>	
Address	
Country	
Representative	
Signature of Representative	
Date	

<b>Local entity / CBTL</b>	
Address	
Country	
Representative	
Signature of Representative	
Date	

Note: List one or more CBTLs as LTR association with the CBTL may be scope dependent

### Annex C Permitted and not permitted combinations

	Combination	Person is employed by	Condition, status, comments
1	NCB-1 wishes to use its own employee for CTF Stage 2 and/or CTF Stages 3 or 4, who is travelling abroad.	The NCB-1	This <b>is permitted</b> , however, this is not an LTR situation and the this OD does not apply. The CTF agreement applies and the Agreement is with the Manufacturer.
2	NCB-1 wishes to use its employee or employee of CBTL-1 within the same corporate family <b>stationed</b> remotely* from NCB-1 or CBTL-1	The NCB-1 or CBTL-1	<b>Case of Employee LTR</b> Yes, this <b>is permitted</b> and no LTR Agreement is required by the LTR program. Internal list shall be maintained, made available to IECEE assessment team on request. <del>It is not necessary to provide this list as part of OD-2019 LTR</del>
3	NCB-1 wishes to use a person employed by its external CBTL-1 (not part of the same corporate family) but stationed remotely from CBTL-1	CBTL-1	Yes this <b>is permitted</b> and LTR agreement is required by the LTR program. It is necessary to <del>provide a list of</del> <b>register</b> such LTRs <del>as part of</del> <b>OD-2019 LTR</b> <del>at the IECEE.</del>
4	NCB-1 wishes to use a person employed in a remote* organization of the same corporate family e.g.: affiliate or subsidiary that is:	A Local NCB-2 of the same corporate family, A Local CBTL-2 of the same corporate family A Local OFFICE of the same corporate family	<b>Case of Employee LTR</b> Yes, this <b>is permitted</b> and no LTR agreement is required by the LTR program. Internal list shall be maintained by the NCB-1, made available to IECEE assessment team on request. <del>It is not necessary to provide this list as part of OD-2019 LTR.</del>
5	NCB-1 wishes to use a person employed by a CBTL-1 of the same corporate family for <del>a product category</del> <b>or a</b> standard that is outside the scope of the CBTL-1	CBTL-1	<b>Case of Employee LTR</b> Yes, this <b>is permitted</b> and no LTR agreement is required by the LTR program. Internal list shall be maintained by the NCB-1, made available to IECEE assessment team on request. <del>It is not necessary to provide this list as part of OD-2019 LTR</del>

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	Combination	Person is employed by	Condition, status, comments
6	NCB-1 wishes to use a person employed by its external CBTL-1 (not part of the same corporate family) for a <del>product category or</del> standard that is outside the scope of this CBTL-1	CBTL-1	Yes, this is <b>permitted</b> and LTR agreement is required by the LTR program. <del>It is necessary to register such LTRs at the IECEE. It is required to provide a list of such LTRs as part of OD-2019-LTR</del>
7	NCB-1 wishes to use a person employed in a remote* organization <b>not</b> of the same corporate family, that is:	Another IECEE NCB-3	This is <b>not permitted</b> due to lack of sufficient control over activities of such a NCB
		Another IECEE CBTL-3	This is <b>not permitted</b> due to lack of sufficient control over activities of such a CBTL
8	NCB-1 wishes to use a person employed by :	A third Party Independent organisation, not in the IECEE	This is <b>not permitted</b> due to lack of sufficient control over activities of a third party due to the actual general weakening of the IECEE Scheme.
9	NCB-1 wishes to use a person employed by :	An independent testing laboratory, not participating in the IECEE	This is <b>not permitted</b> due to lack of sufficient control over activities of such a testing laboratory
First party related organisation			
10	NCB-1 wishes to use a person employed by :	A Manufacturer	This is <b>not permitted</b> due to potential conflicts of interests that may impact impartiality.
11	NCB-1 wishes to use a person employed by :	A Manufacturer's agent or agency	This is not permitted due to potential conflicts of interests that may impact impartiality.

	Combination	Person is employed by	Condition, status, comments
An Independent Individual			
12	NCB-1 wishes to use an Independent Individual	When working <b>solely</b> for NCB-1 <b>under contract</b>	This is <b>not permitted</b> for CTF Stage 1. Yes this <b>is permitted</b> for CTF Stage 2 and CTF Stages 3 and 4, and a LTR agreement is required. This person has to follow the operating rules and procedures of the NCB-1 that is responsible for the full application of OD-2048.
13	NCB-1 wishes to use an Independent Individual	When <b>not</b> working solely for NCB-1	This is <b>not permitted</b> due to inability to have sufficient control over these Independent Individuals and because of potential conflicts of interests that may impact impartiality.

\*Remote means: In a different country or if in the same country, not in the same region, or state.



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