IECEE OPERATIONAL DOCUMENT

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

Subcontracting of Testing Activities
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FOREWORD

Scope
The concept and requirements for subcontracting.

Document Owner
PAC

History of changes

<table>
<thead>
<tr>
<th>Revision Date</th>
<th>Brief summary of changes</th>
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<tr>
<td>2022-11-08</td>
<td>Modification of 1.3 a) to address both AC and DC currents as advised by CTL ETF 07.</td>
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<td>Modification of bullet point one from clause 3.5 and addition of new paragraph at the end of the clause.</td>
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<td>Editorial correction by Secretariat in clause 2.2, Notes 2), reference to clause 6 corrected to clause 5, as during revision of IECEE 02-2 there was a change in clause numbering.</td>
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<td>Correction of clause 2.2 from Specialized Testing Facility corrected to Specialized Testing Laboratory</td>
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1 General principles

1.1 In the IECEE System, a full CBTL shall have the capability to carry out the full test program necessary for an NCB to issue a CBTC, i.e. must have all “Required” test equipment. However, it is recognized that for particular types of tests, subcontracting may be necessary.

1.2 The subcontractor facility must comply with the applicable requirements of ISO/IEC 17025, and relevant IECEE requirements.

1.3 The following criteria are used for determining when subcontracting is permitted:
   
   a) Large and expensive equipment/facility that is rarely used, e.g. vibration test (IEC 60065), high-capacity short circuit test, over 10kA (AC) or 1kA (DC), making and breaking capacities/operational performance capabilities over 1kA (AC) or 100A (DC) (IEC 60947). Such tests can be performed either by a subcontractor or by CBTL staff at the facility of the subcontractor.
   
   b) Special test equipment/facility that only the product manufacturers may possess, e.g. test facilities for radiation-emitting equipment (IEC 60601).
   
   c) Subcontracting for capacity reasons (Clause 3.7 a)

2 Concept of subcontracting

2.1 Subcontracting is defined as performing tests and measurements at a facility other than the one operated by the CBTL.

2.2 Categories of subcontracting

The activities of subcontracting cover the following testing options:
   
   a) Subcontracting to another CBTL
   b) Subcontracting to an outside lab
   c) Borrowing or renting of test equipment for a period of less than 1 year.

Notes:

1. CTF testing covered in IECEE OD-2048 is not considered to be subcontracting.

2. Testing at a SPTL covered in IECEE 02-2, Clause 5, is not considered to be subcontracting.

In the CTL Test Equipment Lists, as per IECEE OD-5003:

- “S” – Test that may be subcontracted
- “W” – Test that may be witnessed at a CTF, another CBTL, or an outside subcontractor
- “SP”- Test that may be performed at a Specialized Testing Laboratory (SPTL)

Note: “R” on a CTL Test Equipment List stands for Required test equipment, which means that the specific test is not intended to be subcontracted and that a CBTL is generally required to have such test equipment and testing competency.

3 Requirements

3.1 The following types of subcontracting may be used:
   
   a) A testing facility already registered in the IECEE System for that particular test.
   b) A qualified testing facility not registered in the IECEE System for that particular test.

3.2 The subcontracting CBTL and the subcontractor shall sign a Subcontracting Agreement, except as provided below:

- CBTLs within the same corporate family, when operating under the same quality system, which includes a properly implemented procedure for subcontracting pertaining to IECEE operations.
• Subcontractable (“S”) tests not yet required by the CBTL (e.g. the test is an alternate test or is not required for the types of products tested by the CBTL).

3.3 The subcontracting CBTL shall have documented quality system procedures for sample shipment to the subcontractors, regardless of the distance and location which include provisions to prevent any damage or other impact to the sample that may affect the testing/measurement results.

3.4 The subcontracted test(s) shall be compatible with the type test sequence determined by the standard(s), i.e. a full sequence of tests may be subcontracted to ensure that there is no disruption of the test sequence.

3.5 CBTL shall exercise full control over its subcontractors in accordance with the relevant requirements of ISO/IEC 17025, the NCB/CBTL's quality system, and the IECEE procedures.

All subcontractors shall be qualified through an initial assessment and shall be re-assessed annually or as needed if used rarely.

• NCB/CBTL shall carry out subcontractor assessments utilizing qualified assessors with the necessary technical background and document the assessment using an appropriate assessment report form.
• IECEE Peer Assessment Team may request to extend the CBTL assessment to include a subcontractor location, to validate the test equipment and subcontractor’s competency, after consultation with the IECEE Secretary.
• For tests that are allowed to be subcontracted, existing accreditation of the subcontractor by ILAC MRA signatory may be recognized together with an administrative assessment of the subcontractors technical competence.
• There is no need for additional assessment for IECEE registered testing facilities used as subcontractors since they are already under the Peer Assessment Program. Compliance with the IECEE rules should be checked through a documentation review at the subcontracting CBTL.
• A subcontractor used by more than one NCB/CBTL not in the same corporate family shall be independently qualified by each responsible NCB/CBTL and shall be subject to validation.

Note: For multiple NCBs within a corporate family, one NCB can be appointed as the responsible NCB for this purpose

Results submitted by the subcontractors shall be accepted through detailed and documented review by the CBTL.

3.6 Only one level of subcontracting is permitted. Therefore, no subcontracting is permitted by subcontractor laboratories.

Note: No subcontracting is permitted by CTF or SPTL laboratories.

3.7 Exceptions to the rule on “Required” equipment

a) In special cases, when the CBTL possesses the “Required” test equipment but the CBTL workload exceeds the testing capacity for this particular test, the CBTL is permitted to subcontract any part of the test program on a temporary basis to a registered CBTL.

b) For “Required Special Large Size testing and Measuring Equipment” that is seldom needed, the test that is specified in the CTL Lists as “Required” ("R") is permitted to be subcontracted.

In such cases, the following requirements apply:
• CBTL shall provide to the IECEE Secretariat the CBTL’s agreement/contract for the subcontracted testing, and on a yearly basis - a declaration stating how many times it was necessary for the CBTL to subcontract the testing.
• If the CBTL needs to subcontract the test 10 times in total, or more than 3 in any one year, the CBTL is required to have the equipment in its possession. In such cases, the CBTL shall provide the IECEE Secretariat the evidence that
the equipment has been installed, calibrated and put into operation, and that the CBTL's staff have been trained in the use of the equipment.

3.8 Borrowing or renting of test equipment

a) The CBTL and the owner of the borrowed or rented test equipment shall have an Agreement/Contract to establish the responsibilities for the calibration, use and maintenance of the equipment, in accordance with OD-5011.

b) The CBTL shall have appropriate provisions to ensure that the transportation of the borrowed/rented test equipment will not affect the correct functioning of the equipment.

c) The IECEE Peer Assessment Team shall verify the competence of the CBTL staff to properly use such equipment, as well as the compliance of this testing/measurement equipment with the CTL and the applicable standard’s requirements.

d) In cases, when it is impractical to ship the borrowed or rented equipment to the CBTL facilities, e.g. extra size of humidity chamber, it is permitted that the CBTL staff carries out the relevant testing/measurement at the facility of the owner of the borrowed or rented equipment.

4 Records

In all cases the responsible NCB/CBTL shall maintain a register of all subcontractors that it uses and the evidence of subcontractors compliance.