



Operation of Witnessed Manufacturer's Testing (WMT) laboratory by a LOVAG Technical Witnesser (LTW)

1. Introduction

- 1.1 The purpose of this 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.
See Annex C for permitted and not-permitted, combinations

2. Definitions

"LOVAG CB (LCB)" - Certification body being a member of LOVAG and granting the licence or a certificate for a product.

"LOVAG Technical Witnesser (LTW)" - A specified, competent and contracted person, operating under the responsibility of an LCB for testing at a manufacturer's laboratory, who locally carries out the required WMT activities.

"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

- 2.1 "**Independent Individual**" is a person legally registered who when working under contract, solely, for a LCB, may act for this LCB as a LTW.

2.2 **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, the LTW;
- execution of a signed agreement (e.g. Annex B) defining the scope of the LTW and enabling his/her activities;

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- registration of the LTW with the LOVAG Secretary, and maintenance of the current details in the register;
- issue of LOVAG Test Certificates including the use of LTWs;
- accepting the liability issues that may arise because of the LTW work;

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

- ongoing supervision and monitoring of the LTW
- qualification of ongoing technical competence of the LTW through assessments and auditing.

2.3 Responsibilities of the LTW

The LTW is authorized to work for multiple LCBs only within the same corporate family.

As a 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 A) within the accepted scope of the LCB;
- maintaining accurate documentation regarding his/her technical competency for the responsible LCB and informing the responsible LCB about any change in status;
- completing an agreement (see Annex B for example) with the responsible LCB and as the Independent Individual alone 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 C), to demonstrate reasonable insurance coverage;
- conducting initial assessment of an MTL, on request of the LCB, only if employed within the same corporate structure of the LCB;

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

3. Supervision and Monitoring of LTW Operations

3.1 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.

3.2 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.

4. Reference Documents

4.1 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

4.2 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 Guide 65: General requirements for bodies operating product certification systems

5. Notification to the LOVAG Secretariat

5.1 The LCB shall register all LTW Agreements by submitting a completed version of Annex A 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 a LTW Agreement changes, in that event Annex A shall be updated, or if it is cancelled.

5.2 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.

6. Agreement between LCB and LTW

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

Annex A

Certification of Electrical Equipment
LOVAG Schemes

LCB LTW Report to the LOVAG Secretary

LCB

Organization: _____

Address: _____

Country: _____ Witnesser: _____

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

LTL (Tick YES if applicable or No if not) YES NO

Organization: _____

Address: _____

Country: _____ Witnesser: _____

Signature of LCB Witnesser: _____ Date: _____

Annex B

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

The agreement between the LTW , the LTL(if applicable) and the LCB concerning the use of the LTW shall specify at least:

Between	LTW
And	-LCB
And	-LTL*

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. The LTW will act on behalf of the LCB for WMT. For WMT (when relevant) the LTW may act, by delegation of the LCB, on behalf of the accepted LOVAG Testing Laboratory. 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.

LTW

Name: _____

Address: _____

Country: _____

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

Signature of LTW _____ Date: _____

LCB

Organization: _____

Address: _____

Country: _____ Witnesser: _____

Signature of Witnesser: _____ Date: _____

LTL (If applicable)

Organization: _____

Address: _____

Country: _____ Witnesser: _____

Signature of Witnesser: _____ Date: _____

ANNEX C			
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 a 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	
	LCB-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 a 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