



## Technical Bulletin

Subject: UL vs. ETL Listing

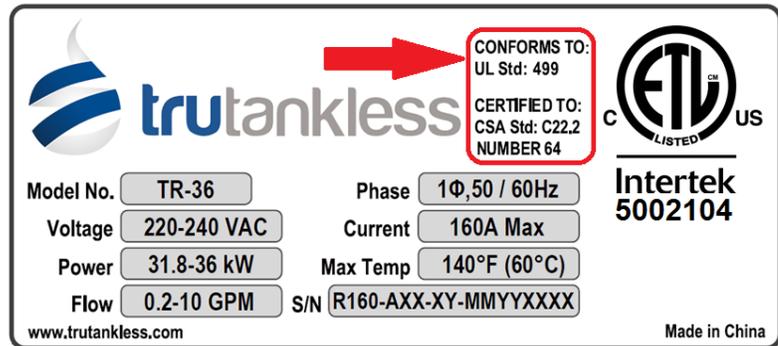
Product: Trutankless® Electric Tankless Water Heaters – TR and TC Models

Date: January 10, 2020

Summary: The purpose of this article is to clarify questions regarding the use and acceptance of ETL product certification versus UL certification on Trutankless products.

### Information:

There have been some questions recently regarding Intertek's ETL Listed certification of our products, having been tested by Intertek rather than UL. The FAQ's below should answer any question regarding this issue. Not only Intertek is larger than UL as an organization, it allows Trutankless to test and certify to a broader scope of standards, including Federal Energy Efficiency Standards set forth by the D.O.E.



One of the key reasons we chose to use ETL is the timeframe in which they can test and certify products is usually much faster than UL. ETL tests to the same standards as UL and their certification has the same recognition by OSHA since they are both Nationally Recognized Testing Laboratories.

Since the ETL Listed Mark is an accepted and recognized demonstration of product compliance, and testing is performed by an NRTL, there is no reason why products bearing the ETL Listed Mark should not be accepted if they are properly installed according to the manufacturers guidelines. Any indication otherwise likely stems from misinformation in the marketplace—the same misinformation that has led some manufacturers to believe they don't have a choice in their third-party testing organization.

Anyone can verify Trutankless products are approved under the ETL Listed mark and comply with UL499 standards by visiting: [https://ramuk.intertekconnect.com/WebClients/ITS/DLP/products.nsf/\\$\\$Search?OpenForm](https://ramuk.intertekconnect.com/WebClients/ITS/DLP/products.nsf/$$Search?OpenForm), or request a verification of certification by calling 1-888-347-5478 or email [etldirectory@intertek.com](mailto:etldirectory@intertek.com).

### Frequently Asked Questions about the ETL Listed Mark:

#### Is the ETL Listed Mark legal equivalent to the UL and CSA Listed Marks?

The true legal requirement to test and certify products for sale in the United States is a designation by the Occupational Safety and Health Administration (OSHA) as a Nationally Recognized Testing Laboratory (NRTL). An NRTL functions to provide independent evaluation, testing, and certification of any electrically operated or gas- and oil-fired product. ETL is recognized as an NRTL in the United States and, in a similar capacity, as a Testing Organization and Certifying Body in Canada by the Standards Council of Canada.

A product bearing the ETL Listed Mark is determined to have met the minimum requirements of prescribed product safety standards. Moreover, the mark indicates that the manufacturer's production site conforms to a range of compliance measures and is subject to periodic follow-up inspections to verify continued conformance.

#### What's the difference between the UL, CSA, and ETL Listed Marks?

Both marks demonstrate that the product that bears it has met the minimum requirements of widely accepted product safety standards as determined through the independent testing of a Nationally Recognized Testing Laboratory (NRTL). And, as part



of that testing regimen, the product manufacturer has agreed to periodic follow-up inspections to verify continued compliance.

### **What is an NRTL?**

A Nationally Recognized Testing Laboratory (NRTL) is an independent laboratory recognized by the Occupational Safety and Health Administration (OSHA) to test products to the specifications of applicable product safety standards – such as those from Underwriters Laboratories (UL) and other standards-writing bodies. An NRTL's function is to provide an independent evaluation, testing, and certification of any electrically operated or gas- and oil-fired products.

### **What are the specifics of the NRTL program?**

The NRTL program is part of OSHA's Directorate of Technical Support. As part of OSHA's directive to ensure that products are safe for use in the U.S. workplace, the NRTL program recognizes the capabilities of private sector organizations to determine if specific products meet consensus safety standards. OSHA safety standards are United States law and can be found in Title 29 of the Code of Federal Regulations (CFR). More specifically, the provisions for NRTL certification can be found within Part 1910 of the CFR (29 CFR Part 1910). It is important to note that OSHA's recognition of an NRTL is not a grant of government authority, but rather an acknowledgment of the organization's ability to perform product safety testing and certification within the scope of its OSHA recognition.

### **Aren't manufacturers required to use UL for their compliance testing? Isn't this mandated by the standards themselves?**

The simple answer to both questions is "no." In fact, this misconception has misled many manufacturers to believe that they don't have a choice in their third-party testing partner. To satisfy the prerequisite of having your products tested by an independent organization, the true legal requirement is that the laboratory which performs the testing be a Nationally Recognized Testing Laboratory (NRTL) recognized by OSHA.

### **What does the ETL Listed Mark mean when displayed on a product?**

In short, the ETL Listed Mark indicates that product has been tested by an NRTL, found in compliance with accepted national standards, and meets the requirements required for sale or distribution. To distributors, retailers, and customers, the ETL Mark is assurance that the product is compliant with safety standards, having been tested and certified by a third-party organization.

### **What should I tell my clients or inspectors who aren't familiar with the ETL Listed Mark?**

There is no standard formula for better acquainting clients and customers with the ETL Listed Mark. Depending on the background, circumstances, and other details of a given situation, the correct approach will be unique from one instance to another. Others may erroneously believe that the UL Mark is the only acceptable demonstration of product compliance and require a more thorough explanation of the true legal requirements behind third party product safety testing. It is important to listen closely to the issues and provide them with real answers to their concerns. Inform them about the NRTL program. Explain to them how our Product Safety Certification Program includes the same testing, listing, labeling, and follow-up inspection services as UL, and that Intertek is accredited by the same organizations, agencies, and regulatory bodies.

### **Is ETL Listed Mark is accepted throughout North America?**

The ETL Mark is an accepted demonstration of product compliance in the United States and Canada. Since the ETL Listed Mark is a recognized and accepted indicator of a product's compliance to safety standards, retailers, inspectors, or Authorities Having Jurisdiction (AHJs) all accept ETL Listed Products.

### **Do local inspectors know the ETL Listed Mark?**

The ETL Listed Mark is broadly recognized by local inspectors and Authorities Having Jurisdiction (AHJs) throughout North America and also in some areas of South America. Intertek is an NRTL recognized by OSHA and ANSI with more than 1,000 laboratories in over 100 countries. The ETL Listed Mark is an accepted alternative to UL and, as such, inspectors and AHJs recognize, acknowledge, and accept the mark as proof of product compliance.

### **How long has the ETL Listed Mark Been Around?**

"ETL" has been around over 100 years. In fact, the original Electrical Testing Labs (ETL) was founded by Thomas Edison in 1896. Electrical Testing Labs was formed to address concerns of lamp safety and performance issues. Edison's vision was to provide assurance to consumers, through various types of product performance and safety tests.

### **What are the variations of the ETL Listed Mark?**

A product bearing the ETL Listed mark with the "us" identifier at the 4 o'clock position has been tested and deemed compliant to U.S. product safety standards only. An ETL Listed mark with a "c" identifier at the 8 o'clock position means the product bearing it complies with Canadian product safety standards only. And an ETL Listed mark with both "us" and "c" identifiers at the 4 o'clock and 8 o'clock positions respectively, signifies that the product bearing the mark complies with both U.S. and Canadian product safety standards.

**PLEASE CONTACT TRUTANKLESS, INC. ABOUT ANY FURTHER INQUIRIES RELATED TO APPLICABLE CERTIFICATIONS FOR INSTANTANEOUS ELECTRIC WATER HEATERS VIA OUR WEBSITE OR EMAIL TO [SUPPORT@TRUTANKLESS.COM](mailto:SUPPORT@TRUTANKLESS.COM) OR BY CALLING 1-855-862-8987.**



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