

November 1, 2019

OPEN LETTER TO ALL APPLICANTS AND MANUFACTURERS

Clarification regarding Bilingual Caution/Warning/Danger Marking Requirements for Canadian Certification

Dear Applicants and Manufacturers:

We have received a number of questions regarding requirements for caution/warning/danger markings (Cautionary Marking) on products that are certified to Canadian requirements. The requirement for bilingual Cautionary Markings is well established in Canada and the Standards Council Canada (SCC), as well as many retailers, are verifying compliance. This letter is to assist you in understanding the requirements for bilingual Cautionary Markings and maintaining cETL certification with Intertek and acceptance at many retailers.

Background

The Canadian Electrical Code and Canadian law require all Cautionary Markings for electrical and gas-fueled products sold in Canada to be in English and French. This means that for every cETL listed product, all Cautionary Markings on the product, whether required by the product standard or not, must be bilingual.

1. The Canadian National Standards (such as CSA C22.2 No. 250.0, *Luminaires*), when bilingual markings/instructions are covered, are the first place to find requirements.
2. If the product-specific Canadian Standards is silent on Cautionary Markings, Intertek requires that all Cautionary Markings on the product be described in the Certification Report, which includes all markings with keywords "Caution", "Warning" or "Danger", an advisement of what the risk is, and how to avoid the risk. All these markings are required to be bilingual (English and French).

References

- The following section of the Canadian Electrical Code CSA C22.2 contain bilingual requirements for Cautionary Markings:
 - 6.3 *Language of Markings*
 - 6.3.1 *Caution and warning markings shall be in English and French except as permitted by Clause 6.3.3.*
 - 6.3.2 *Individual standards shall include the French translation of the markings (in an appendix).*
 - 6.3.3 *Where the product is intended for use outside Canada, caution and warning markings may be in other languages. As most electrical products are evaluated to a CSA C22.2 No XXX standard, you'll find those either refer directly to CSA C22.2 No 0 or make reference to CSA C22.1 (which then contains reference to C22.2 No 0).*
- Additional information on Canadian Law: [Link to Canadian Law](#)
- Additional bilingual information contained in the Consumer Packaging and Labelling Act: [Link to Consumer Packaging and Labelling Act](#)
- Additional bilingual requirements for products sold into the Province of Quebec: [Link to Province of Quebec](#)

Certification Report Requirements

Certification Reports covering cETL listings shall include an illustration of the required bilingual Cautionary Markings. Simply stating the caution and warning markings are bilingual, as provided by the manufacturer, is insufficient. If the required marking is identified in the applicable Canadian Certification Standard, it should match verbatim. If required bilingual markings are not in the applicable product standard (see Background, Item 2 above), the client-provided bilingual marking will be verified. If resulting translation does not match in meaning, the marking will not be accepted and corrected markings will need to be supplied.

For each new or modified Certification Report covering a cETL listing, Intertek's Certification Department will review and verify the Cautionary Markings required to be on the product include both English and French wording in the Certification Report.

As of July 19, 2013, in addition to Caution Markings with the specific key words ("Caution", "Warning" or "Danger"), Caution Markings required to be yellow/black that have explanation wording will also need to be provided in both English and French.

Variations in Production

Bilingual Cautionary Marking requirements are now well established at Intertek (and other Certification Labs) and the markings have appeared in Intertek Certification Reports for many years. Effective immediately, if the bilingual Cautionary Markings are not observed during follow-up inspections at manufacturing locations, a Variance will be identified in the Inspection Report but, barring other critical Variance items, the shipment will not be held. However, the Inspection Report will state that any future occurrences of lack of bilingual Cautionary Markings will result in the shipment being held until the required markings are applied.

IF, DURING SUBSEQUENT FOLLOW-UP INSPECTIONS, THE REQUIRED BILINGUAL CAUTIONARY MARKINGS ARE NOT OBSERVED, THE SHIPMENT WILL BE HELD UNTIL THE REQUIRED MARKINGS ARE APPLIED OR THE cETL LABELS ARE REMOVED.

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We hope this letter helps explain the Cautionary Marking requirements for certification when the cETL Mark is applied and will help you comply with the Safety Certification requirements. Please contact the Intertek Certification Department with any questions.

Best Regards,



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