



Setting Standards for Excellence

The Association of Electrical and Medical  
Imaging Equipment Manufacturers

[www.nema.org](http://www.nema.org)

August 2, 2010

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Minneapolis, Minnesota 55403

**SUBJECT: RILA Factory Audit Program**

Gentlemen:

As suppliers of consumer electrical products to the retail industry, we the undersigned are writing to inform you of our serious concerns with the Retail Industry Leaders Association/British Retail Consortium (RILA/BRC) consumer product factory audit program. Despite the best of intentions—reliable and safe electrical products, which we

all consider fundamental to our businesses—we believe the RILA program, based on a British consumer product safety and food standard, is misguided in its present form. In an attempt to stem the flow of substandard direct imports, the RILA/BRC consumer product factory audit program has taken aim at the companies that need this kind of program the least. This duplicative audit program is too broad, too prescriptive, too expensive and so vague in its requirements as to be a threat to the existing U.S. third party certification process that has ensured safe and effective electrical products for the domestic marketplace for over 100 years.

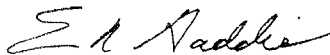
According to assessments of the standard done by safety and risk professionals at electrical manufacturing companies, over 80% of the 400+ elements called out in the factory audit standard have nothing to do with product safety or quality. Ironically, what is lost in the enormous complexity and detail of this standard is the real need for product designers to evaluate risk assessment in design and for manufacturers to do a similar risk assessment for production. NEMA, representing electrical product manufacturers, has repeatedly offered to help RILA put this kind of program in place, but RILA has never taken these offers seriously.

The standard and a soon to be developed guide for electrical products have been developed with little to no involvement of the people who understand electrical product design and production the best. Furthermore, program designers envision thousands of trainers and inspectors traveling around the globe to visit and evaluate tens of thousands of facilities. This is unrealistic at best and at worst an unwarranted imposition of cost on some of your most reliable suppliers. We fear that the only beneficiaries of this program will be the testing and auditing organizations who will reap enormous fees for a very small return on investment.

NEMA is prepared to work with RILA to ensure reliable and safe electrical products. We call on you to join with NEMA and to encourage RILA to create an efficient and cost-effective factory audit program that precisely addresses your product quality and safety issues.

Your consideration is very much appreciated.

Respectfully,



Mr. Evan R. Gaddis  
President & CEO  
NEMA



Mr. Charlie F. Jerabek  
Chairman of the Board  
NEMA  
Vice Chairman  
OSRAM SYLVANIA

**National Electrical  
Manufacturers Association**  
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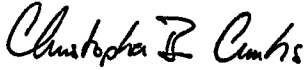
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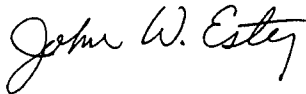
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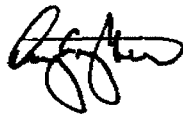
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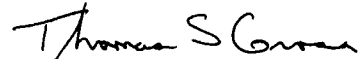
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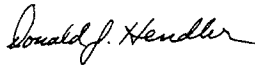
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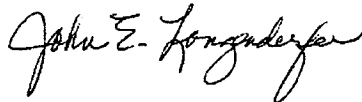
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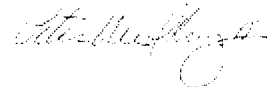
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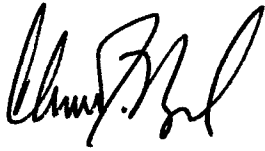
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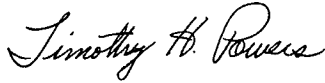
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