



GENERAL GUIDE

TO

**CONFORMITY OF PRODUCTION
(COP)**

**ASSESSMENT
PROCEDURES**

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INTRODUCTION

1. If you have made (or are about to make) an application for an approval certificate to be issued by VCA, you are probably already preoccupied with the test/inspection and documentation requirements. There is however one other important factor which must not be overlooked in your planning and that is, the requirements for conformity of production arrangements, to be found in the Type Approval Regulations. Conformity of Production in the context of this guide means the ability to produce series products in conformity with the specification and performance requirements of the original type approval. Whether you are a UK manufacturer, or the UK agent applying for approvals on behalf of a manufacturer outside the UK, responsibility to ensure that suitable conformity of production arrangements are applied must be established.
2. Conformity of Production is dealt with by a specialist group in VCA and their key function is to advise applicants on and execute the two general conditions required by most type approval standards, namely:
 - a. to verify that adequate arrangements are in place **before an approval is issued** to ensure that subsequent products continue to conform to the approved type (Initial Assessments);
 - b. to monitor periodically that the arrangements continue to be effective during the life of the approval (Monitoring Assessments).

WHAT IS INVOLVED?

3. Shortly after you have received acknowledgement of your application you will be contacted using a standard letter, together with a list of headings covering our areas of interest. The letter also contains the name of your COP contact who will be able to explain the action required as appropriate to your circumstances - approval applied for, size of company etc.
4. If you have applied for approval for seat belts, child restraints or glass there are special arrangements, described later.
5. The particular COP requirements will vary but are likely to involve all or a combination of the following:
 - a. Documented company policy and quality assurance systems (usually a copy of the quality manual - see example on page 5 Part A).

However this information will not be required if your company is already certified to an appropriate ISO 9000 series standard by a certification body recognised by VCA. You will need to send a copy of your certificate to VCA for vetting to establish its suitability.
 - b. Initial Assessment at the manufacturing site, by the COP assessors who will look for the implementation of the systems declared.
 - c. Agreement to control plans for particular tests procedures or checks carried out, before, during and after the manufacturing process, which will help to confirm that the products continue to meet the approval. This may mean using equipment and procedures specified in the approval standard applied for. (Some standards are very specific on this point and include a requirement for periodic tests at an approved facility



- see page 5 part B). A guide to control plans will be sent to all new applicants for approval.

d. Monitoring Assessment at the manufacturing site at an advised frequency, to check that Quality control systems are still operating satisfactorily. However this will not be done if you have an acceptable ISO 9000 series certification. We may however visit periodically to confirm that your control plan requirements continue to be met, and where appropriate witness a test (a control plan visit).

6. Assessment visits are carried out on a mutually agreed date and to a pre-arranged programme. (Some smaller companies may only take 1 day, others up to a week or more). The visits usually involve:
 - a brief opening meeting to clarify requirements and programme details
 - a tour of appropriate areas of the manufacturing site(s)
 - daily closing meetings to discuss and agree findings for that day
 - final closing meeting to review and agree all findings

A report of the visit is prepared and the Head of Technical Support Branch of VCA writes to the company, formally advising that conformity of production clearance is granted or requesting appropriate corrective action in those items outstanding at the final meeting (known as deficiencies).

HOW DO DEFICIENCIES AFFECT MY ABILITY TO PRODUCE?

7. In the case of an initial assessment, serious deficiencies would prevent the issue of the approval applied for and require a follow-up visit to verify rectification. Similarly serious deficiencies on a monitoring visit would need to be rectified within an agreed timescale according to the circumstances. If not, we would request the suspension of production or possibly withdraw any approvals held.
8. Our normal practice with less serious deficiencies is to request a written statement of actual or proposed corrective actions together with the timing of their implementation. A follow up visit may be arranged and these deficiencies will be taken into account when setting the frequency of future monitoring visits.

WHAT STANDARD HAS TO BE ACHIEVED?

9. The Type Approval Regulations do not specify a particular standard for the quality assurance element, nor is a specific standard required by VCA. However, the requirements of specific clauses contained in some of the ECE Regulations and EEC Directives must be met and general quality arrangements must be adequate. The principles of Conformity of Production control requirements that we apply are also set out in Annex X of EEC Directive 92/53. In practice, the general principles covered in the international Quality standard BS EN ISO 9001/2 are applied to those areas of manufacture considered important with respect to the approval applied for. The quality systems normally operating within the majority of companies for commercial purposes usually satisfy the requirements - adapted as necessary to meet particular legislative clauses, depending upon approvals applied for or held.

WHAT IS EXPECTED OF THE SMALL BUSINESS?

10. We appreciate that a small business will not be able to operate controls such as those found in say a multi-national company and the COP assessors will discuss each situation according to the circumstances. Nevertheless, the responsibility for quality must be clearly defined and appropriate systems seen to be operating.



SPECIAL ARRANGEMENTS FOR SOME COMPONENTS

11. Currently for **seat belts, child restraints and glass approvals**, VCA utilise the expertise and resources of the British Standards Institution (BSI), through BSI Systems Assessment based in London, and BSI Testing at Hemel Hempstead. These components are initially tested by BSI Testing and may also be the subject of the BSI Kite Mark scheme.
12. Initial assessments for these components are usually joint VCA-BSI visits; the majority of monitoring assessments are then carried out by BSI, combined (if applicable) with their Kite Mark monitoring visits. A separate more detailed note will be forwarded to you if you are applying for an approval for one of these components, which sets out, among other things, arrangements for COP samples to be tested at the BSI or your own test facility if approved.

WHAT HAPPENS IF A COP TEST INDICATES A NON-COMPLIANCE?

13. One of the systems we would expect to see in place would be a record of corrective action taken for all problems found on company COP checks. In the more serious cases, we would expect a thorough investigation into the cause, including further tests to demonstrate that the problem had been rectified - sales release being suspended until fully satisfied. Where the problem is found on one of the tests required to be performed at the official laboratory e.g. seat belts, we will be informed immediately and communicate with you to discuss necessary action. This normally leads to further tests at the laboratory at the company's expense. Serious or persistent infringement of these procedures can lead to expensive recalls, and ultimately, withdrawal of the approval held.

FURTHER ADVICE

14. If you have any other questions in relation to the approval application regarding Conformity of Production, our COP engineers are always prepared to discuss them with you. Please do not hesitate to contact VCA to explain your particular situation.

How to contact us:

Please do not hesitate to contact us by mail, Derek.lawlor@vca.gov.uk or angie.bissett@vca.gov.uk

CONFORMITY OF PRODUCTION - DOCUMENTATION REQUIRED

<p align="center">Part A Quality Management System (Quality Manual)</p>	<p align="center">Part B Summary of Arrangements made to ensure Compliance with Type Approval Requirements for each approval sought/held (COP Control Plan).</p>
<ol style="list-style-type: none"> 1. Management Responsibility 2. Quality System 3. Contract Review 4. Document Control 5. Purchasing 6. Purchase Supplied Product 7. Product Identification and Traceability 8. Process Control 9. Inspection and Testing 10. Inspection, Measuring and Test Equipment 11. Inspection and Test Status 12. Control of Non-conforming Product 13. Corrective Action 14. Handling, Storage, Packaging and Delivery 15. Quality Records 16. Internal Quality Audits 17. Training 18. Statistical Techniques 	<ol style="list-style-type: none"> 1. Product Reference 2. Approval Requirement 3. Stages of Inspection 4. Characteristics to be Inspected 5. Inspection Level/Frequency 6. Equipment to be used 7. Responsibilities 8. Records