



INTRODUCTION

TO

CONFORMITY OF PRODUCTION (COP)

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INTRODUCTION TO CONFORMITY OF PRODUCTION

In applying for an approval certificate to be issued by VCA, one important requirement in the Type Approval Regulations, which must be included in your planning, is Conformity of Production (COP).

COP means the ability to produce series products in conformity with the specification, performance and marking requirements in the type approval. Whether you are a UK manufacturer, or the UK agent applying for approvals on behalf of a manufacturer outside the UK, and whatever your product is, suitable COP arrangements must be made.

VCA has a specialist COP group, whose function is to assess manufacturer's quality systems and procedures, in order to see that the two key conditions of most type approval standards are met:

- a. to verify that before an approval is issued, there are robust controls in place to ensure that all products made conform to the approved type.
- b. to monitor periodically that the controls continue to be effective during the life of the approval.

WHAT IS INVOLVED?

This depends very much on your individual circumstances. This note describes the main elements of all our COP activities, but you should also check whether there are any specific requirements written into the COP sections of the standards for your particular products.

You will be given the name of a VCA contact for COP at an early stage in your application, who will be happy to discuss with you or arrange a meeting if you wish. Whether you are a major multi-national company with formal certification for your quality management systems, for example, or a small business with very little in the way of documented quality systems, your VCA COP contact should be able to establish the best way to proceed.

PRINCIPLES OF COP

DOCUMENTATION

To help us build up a picture of your company, and the methods you use to control your product, we need some information about your quality control systems.

We may send a questionnaire for you to complete, or we may send a list, naming the particular areas we should like documented. We may ask you to prepare a Control Plan, listing all the checks and tests carried out before, during, and after the manufacturing process. We can give guidance on Control Plans if you need it.

We will require a copy of your Quality Manual, if you have one. If your manufacturing site has any formal certification for its Quality Management Systems (BS 5750/ISO 9000 series), we will ask for a copy of the certificate, and we may accept this certification, in conjunction with a suitable Control Plan.

After reviewing these documents your COP contact will decide how to proceed.



INITIAL ASSESSMENT

Although in certain circumstances it may be possible for the COP requirements to be satisfied by documentation alone, in many cases it is necessary for an Initial Assessment of your manufacturing site to be carried out. The assessment, by our COP engineers, will audit all areas of the factory relevant to the type approvals you are seeking, to see your controls working.

If we have accepted certification of your systems, we may still visit to see how you meet your Control Plan. If all is satisfactory, you will be granted COP clearance, allowing your approvals to be issued.

MONITORING

VCA will continuously monitor your COP during the life of your approvals. This is achieved by either monitoring assessment visits or control plan monitoring visits, both very similar to the initial visits described above, and/or reviewing records. VCA also by purchases and tests products offered for sale in the UK. These monitoring activities, as with all of VCA's work, are controlled by our own procedures, and your COP contact will keep you informed as to when they are due.

IF PROBLEMS OCCUR

If it is found during any COP assessment that your procedures or working practice do not meet the COP requirements of the approval, then the assessor will discuss this with you in detail, and will raise written non-compliances, asking you to take corrective actions, within a realistic timescale.

You should note that if serious deficiencies are found in your quality systems, which we are unable to rectify, or serious or recurring problems with your products in COP tests, VCA may need to consider urgent actions. This could include the suspension of sales, a product recall, and ultimately your approval may be withdrawn.

NORTH AMERICA AND EAST ASIA

If you are based in North America or East Asia, our local office will be your contact for both your approval work and for COP matters.