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1.0 INTRODUCTION

Prior to issuing any Type Approval Certificate there is a need for Conformity of Production (COP) to be assessed. Conformity of Production is required to ensure that there are adequate arrangements in place to ensure that subsequent products continue to meet and conform to the approved type and to monitor that these arrangements continue to be effective during the life of the approval.

There are two main routes for demonstrating COP compliance. The first method is through an accredited quality management certification such as the ISO 9001:2015 and subsequent editions or IATF 16949. In conjunction with an accredited quality system certification , specific control plans are also required, and also information on how you deal with COP related change control and access to relevant legislation. As the requirement for a accredited quality management system is not mandatory the second method for demonstrating CoP compliance is for manufacturer's who do not have a recognised quality system. In these cases a quality manual, detailed control plans, change control process and demonstration of access to relevant egislation is required.

The quality manual and control plans should be detailed enough to ensure with a high degree of confidence that compliance with all the relevant directive or regulations can be continually met.

In both cases CETOC TS may deem a site visit may be necessary to ensure that the procedures supporting the application are in place and are sufficiently robust. This will be discussed with you when you make your application.

2.0 RELATIONSHIP TO QUALITY CERTIFICATION

When considering the extent of the initial assessment to be carried out, the EU type-approval authority *may* take account of available information relating to quality systems not accredited in conjunction with detailed relevant control plans, however the type authority *must* take account of a suitably accredited quality management system in assessing the CoP requirements.

The suitability of quality system certifications depends mainly upon the scope covering the respective manufacturing operations and locations and also upon the recognition of the accredited registration arrangements for the certification body. CETOC TS currently accepts all certification bodies accredited by an Accreditation Body reconized by IAF.

3.0 Control plans legislation requirements

Annex IV Conformity Of Production - paragraph 3.2 of EU 2018/858 states:

3.2. Before granting a type-approval pursuant to this Regulation and to a UN Regulation annexed to the Revised 1958 Agreement, the approval authority shall verify the existence of adequate product conformity arrangements and documented control plans, to be agreed with the manufacturer for each approval, to carry out at specified intervals the tests or associated checks that are necessary to verify continued conformity with the approved type, including, where applicable, tests specified in this Regulation and the said UN Regulation.

Specific control plan information is required in the following circumstances:

a. clients applying for approval to CETOC TS for the first time;

b. existing clients applying for approval in a new subject

c. applications for European Whole Vehicle Type Approval;

d. approval holders not visited by CETOC TS who requested that CETOC TS accept suitable ISO9001 certification for National Whole Vehicle Type Approval (Car or Goods) and/or international systems approvals;

e. components approvals having specific CoP requirements e.g. seat belts & glass.

4.0 CONTROL PLANS

A control plan is the documented description of those procedures, checks or assigned activities necessary to verify that production units continue to conform to the type approval requirements with regard to specification, marking and performance. (Annex IV Conformity Of Production - paragraph 3.2 of EU 2018/858 states).

The aim of the control plan information is to show that the appropriate level of control exists in relation to those aspects of the product, which are critical to its continued type approval, it should also provide a means of monitoring compliance. It may be that between models, the needs are broadly similar for a particular subject however consideration needs to be given as to whether or not the conditions should be different for specific models. This may be for example where initial results are close to the limit or special specifications or processes were introduced in order to achieve compliance.

The documented description normally addresses the elements outlined below in a separate document (for example a Quality Plan) but control criteria may be clearly referenced in accessible sections of specific quality documentation.

For the arrangements to be effective and capable of demonstrating conformity, the control plan information needs to take account of requirements for particular types or models and individual subjects applicable to those types. It will not be acceptable for example to give only general statements such as “controls ensure that all legislative requirements are met”, CETOC TS believe that the following may need to be addressed in order to establish adequate understanding for specific systems and components:

Control Description describing what is being checked for

Test Method is it a visual check, electrical, mechanical?

A visual check may be made against a master. Dimensions may be checked in a rig, a voltmeter may be needed for electrical tests etc..

Pass/Fail what are the criteria against which a sample is deemed to have passed or failed?

Frequency is every product tested or 1 in 500, for example

Department those responsible for the check or test

Report method of recording results

Follow up Responsibility for follow up action

For whole vehicle approval, the control plan arrangements may be limited to verifying the correct build specification in relation to the system and component approvals.

5.0 PREPARATION OF PLANS

Preparation of plans, the structure and amount of detail included within the above framework, rests entirely with the manufacturers (and not the assembly plants), in relation to their own particular circumstances. For example:

a. *the format of the Control Plan is not defined and may be as the manufacturer chooses to present it.*

b. *the content of the Control Plan is not defined except for Regulation specific clauses.*

c. *the checks or test may be carried out by or on behalf of the manufacturers and may include evidence of supplier's controls. Some specific regulation may require that the manufacturer has immediate access to suitable test equipment.*

d. *a common control systems used across a range of similar products, sites or subjects (e.g. body, drive train, etc.) will be acceptable on a suitable referenced single plan.*

By way of illustration, appendices 1, 2 & 3 show one format for a separate control plan with useful front sheet information and outlines of an arrangement to cover a system approval for various subjects (appendix 2) and a whole vehicle approval (appendix 3). However, whole vehicle approvals always require control plans for each system approval or test report.

It is particularly stressed that these are only outline examples, provided to help with understanding. Other formats or content may be appropriate. Any values shown do not represent acceptance levels or target requirements.

6.0 RELATED CONTROL SYSTEMS

Certain elements, critical to CoP in the type approval context, are not necessarily covered by the control plan as defined above.

a. control of change, so that for example, alternative suppliers or revised specifications are not introduced before the type approval of the change has been authorised.

b. control of the accuracy issue of Certificates of Conformity, so that details are pertinent accurate for the vehicle variant produced and the certification issued.

7.0 ACCEPTANCE

The arrangements outlined above both satisfy the respective legislative responsibilities and enable CETOC TS to build confidence in the overall control of the type approved product to be issued with an approval certificate. Manufacturers will be requested to propose their own control plan arrangements for CETOC TS to discuss with them on an individual basis. Where revision of any aspect is considered necessary to adequately fulfil the initial requirements, this will be mutually agreed with the manufacturer and an amended control plan established.

8.0 MONITORING ACTIVITIES

Annex IV Conformity Of Production - paragraph 3.4 of EU 2018/858 states requires the authority issuing an approval to monitor the manufacturer's conformity controls. That section and the clauses in some of the individual directives also require the authority - when not satisfied with the manufacturer's assurance of conformity - to select samples and subject them to type approval tests. A good understanding between the manufacturer and CETOC TS will establish arrangements where such special action is the exception.

CETOC TS has a responsibility to periodically monitor the implementation of the control plan arrangements. This will normally be by visiting the sites where the actions are carried out (as certain Regulations require - though other arrangements may be agreed). Records of decisions, actions or results should be retained for a realistic period (which can be agreed with CETOC TS). In the case of UNECE Regulations this should be at least 10 years. Several aspects will be relevant to the monitoring activity, for example:

a. monitoring arrangements will review any changes which the manufacturer has made to the initial control plan with particular reference to aspects discussed above;

b. the frequency of monitoring will be kept to a minimum and will be discussed according to the plan content, any specific legislative requirement and previous review findings;

c. where some of the controls outlined are to be carried out by a supplier CETOC TS may wish to verify that the supplier and the products or services concerned are acceptable to the manufacturer as defined within the quality system (e.g., is on an approved suppliers list with an appropriate rating).

APPENDIX 1

SOME HELPFUL HEADINGS FOR GENERAL INFORMATION	
COMPANY: XYZ Company Ltd PRODUCT DESCRIPTION: Passenger Car TYPE APPROVAL SUBJECT: All system directives and EC Whole Vehicle approval issued by CETOC TS SPECIFIC (DIR/REF) COP TEST REQUIREMENTS: Applicable requirements indicated on subject plans or addressed by XYZ company procedure PC-123 SITE OF MANUFACTURE: Operations related to the above are carried out at the following sites: Engine Manufacture: Body Pressing and Body Assembly: Vehicle Assembly: APPROX. PROD. VOLUMES: Continuous production for most vehicle types - approx (x) per year	COMPANY: I C Kleerly Ltd PRODUCT DESCRIPTION: Mirror TYPE APPROVAL SUBJECT: EC Directive 70/127/EEC SPECIFIC (DIR/REG) COP TEST REQUIREMENTS: Impact Test: (X)/Year at contracted laboratory Assembly Specification: (X)/batch, include. edge rad and marking Reflectivity: by Glass supplier with COC SITE OF MANUFACTURE: XYZ Industrial Estate APPROX. PROD. VOLUMES: Batch of 100/Day

GENERAL OUTLINE OF CONTROL PLAN RELATED INFORMATION:	GENERAL OUTLINE OF CONTROL PLAN RELATED INFORMATION
XYZ company holds a quality system certification to ISO9002 Information addressing engine, body and vehicle assembly controls related to approvals is provided, using the attached model control plan applied in accordance with WI-123. Company procedure(s) (PB0123) require the Homologation Department to authorise both initial build schedules and subsequent changes before release for production. Details to be entered on Certificates of Conformity are authorised by the Homologation Department and controlled in production by reference to Variant/Version, build code and VIN. EC WV C.O.Cs are generated at national distributors by data link. Input is controlled by the Homologation Department.	I C Kleerly Ltd has a documented control system dedicated to the production of after - market mirrors. Changes to the product are verified against type approval requirements and authorised for production on form 1234 following any necessary homologation action.

Appendix 2: Example of a Control Plan

Subject	Legislation		CoP Requirements		
	Directive	Regulation	Inspection Type	Frequency	Control
Noise	70/157	51	1	1 per year	IVXX1
			2	1 per month	
Emissions	70/220	83	1	1 per month	IVXX2
			2	1 per month	
			4	100%	
Audible Warning	70/388	28	1	1 per Year	IVXX3
			2	1 per month	
			4	100%	
Seat Strength	74/408	17	2	1 per month	IVXX4
			3	100%	
			4	100%	
			5	100%	
Speedometer	75/443	39	1	1 per year	IVXX5
			2	1 per month	
			4	100%	

Key	
1	Vehicle Test
2	Visual Inspection
3	Record on build log
4	Function check
5	Supplier CoP

Type of Inspection	Description	Procedure	Responsibility	Record
1	Drive by noise	IV-1.2.3	Quality	Test Report
2	Exhaust/Air cleaner/ECU ID	IV-1.2.3	Quality	Monthly CoP audit sheet

Control Description Sheet – IVXX4 Seat Strength

Type of Inspection	Description	Procedure	Responsibility	Record
2	ID/Installation	IV-2.3.4	Quality	Monthly CoP audit sheet
3	Seat Function	IV-2.3.5	Production	Build log
3	Seat Anchorage	IV-2.3.5	Production	Build log
5	Seat Test	IV-3.4.5	Supplier	Test Report

APPENDIX 3 AN EXAMPLE OF A SPECIFIC CONTROL PLAN FOR WHOLE VEHICLE

(Separate System Control Plans must also be in place)					
CONTROL DESCRIPTION	**AREA RESPONSIBLE**	**FREQUENCY**	**ACCEPTANCE STANDARDS**	**FORM OF RECORD**	**RESPONSIBILITY FOR FOLLOW-UP ACTION**
Comparison of initial order, engineering spec, build spec, bill of materials, with type approval cert & C.O.C.	Quality Audit	Twice per year	No deviation from matrix or from C.O.C. data	Report	QA Manager
Specific TA Components sign-off during assembly	Assembly	100% of production	No deviation from build card	Build Card	Team Leader
Type approval audit on finished vehicles	Quality Audit/Homologation	x sample of production	No deviation from information document variant matrix	Report	QA Manager