

Revision N°	Release Date	Description	QR Validation	CEO Approval
1	11/10/2024	General Review	S. Andreatta	L. Rossi
0	10/01/19	First Release	S. Andreatta	L. Rossi

## Introduction to Conformity of Production (CoP)

The Conformity of Production (CoP) assessment is part of the Type Approval process. If you are applying for an Approval certificate, you will also need to satisfy the requirements for CoP and gain CoP clearance.

CoP means the ability to produce a series of products in conformity with the legislation, specification, performance and marking requirements in the Type Approval.

CETOC TS has a specialist CoP department, 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 to conform to the approved type.
- b. To monitor periodically that the controls continue to be effective during the life of the approval.

### Boundaries of activity

This is dependent **if there are specific procedure requirements by single EU Authority where CETOC TS is designated**, on the individual circumstances of the company and what legislation applies to the Type Approval application. Documentation will be initially requested to support your application. This documentation includes:

- Control Plans showing ongoing compliance
- Change Control Procedure
- If a formal quality system is in place (ISO 9001 or IATF 16949\*) a copy of the certificate
- Quality Manual, if no formal accredited quality system is in place (ISO 9001 or IATF 16949)
- An Assembly Plant Statement if you are using a manufacturer who is not part of your company

Along with the documents above, we would also need to know how you access the latest legislation. An onsite CoP Assessment Audit may also be required before CoP can be granted. If you are covered by an EU member state compliance statement, this can also be accepted assuming the information on the certificate matches with what is being applied for with CETOC TS.

*\*ISO 9001 certification and/or IATF 16949 are recognised by CETOC TS for acceptance.*

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## 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. For Manufacturers that are not ISO/ IATF certified an initial assessment will always be conducted. An audit will also be required if the legislation being applied for demands it. The assessment, which will be conducted by a CoP **Lead auditor**, will audit all areas of the factory relevant to the Type Approvals you are seeking, to observe your controls working.

If you have an acceptable ISO/ IATF quality system in place, the CETOC TS may also need to conduct an initial assessment.

## Monitoring

CETOC TS will continuously monitor your CoP during the life of your Approvals. This is achieved by either monitoring assessments audits combined with a technical document review or by a technical document review without an audit. If changes are made within the lifetime of your Approval, you will need to notify the CETOC TS including the CoP department so that your CoP clearance can be reviewed.

## Problems Solving

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 details, and will raise written non-conformances (NC's), asking you to take corrective actions within a set 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 are found during CoP tests, CETOC TS may need to consider urgent actions. This could include the suspension of sales, a product recall, and ultimately your Approval may be **request to the EU Authority for** withdrawn.

Conformity of Production – Documentation Required	
Quality Management System (Quality Manual)	Summary of Arrangements made to ensure Compliance with Type Approval Requirements for each Approval sought/held (Control Plan)
<ol style="list-style-type: none"> <li>1. Management Responsibility</li> <li>2. Quality System</li> <li>3. Contract Review</li> <li>4. Document Control</li> <li>5. Purchasing</li> <li>6. Purchase Supplied Product</li> <li>7. Product Identification &amp; Traceability</li> <li>8. Process Control</li> <li>9. Inspection &amp; Testing</li> <li>10. Inspection, Measuring &amp; Test Equipment</li> <li>11. Inspection &amp; Test Status</li> <li>12. Control of Non-conforming Product</li> <li>13. Corrective Action</li> <li>14. Handling, Storage, Packaging &amp; Delivery</li> <li>15. Quality Records</li> <li>16. Internal Quality Audits</li> <li>17. Training/Competence</li> <li>18. Statistical Techniques where relevant</li> <li>19. Change Control</li> <li>20. Access to Legislation</li> </ol>	<ol style="list-style-type: none"> <li>1. Product Reference</li> <li>2. Approval Requirement including any legislation requirements</li> <li>3. Stages of Inspection</li> <li>4. Characteristics to be Inspected</li> <li>5. Inspection Level/Frequency</li> <li>6. Equipment to be used</li> <li>7. Responsibilities</li> <li>8. Records</li> </ol>
	Change Control Procedure
	<p>This should include all sites linked to the Type Approval and CoP and should ensure that there is a Change Control Process in place to ensure that any potential changes that may affect Type Approval are reviewed prior to implementation and there is a process in place to request an Extension to an Approval prior to implementation of change, if required.</p>

These are examples of the types of areas we would expect to find covered within the relevant documentation and systems. The list is non-extensive and the information as above is for guidance purposes only.