



Vehicle  
Certification  
Agency

# Audit Procedures Conformity of Production (CoP)

## Introduction to Audit Procedures

An audit may be required for a number of reasons: an initial application for Type Approval, lack of accredited quality system certification, required by the relevant legislation (mandatory audit) or monitoring visit.

Audit visits are carried out on a mutually agreed date and to a pre-arranged programme. Audits will vary in length and factors that will be taken into consideration include: company size, location, employee numbers and products manufactured, but usually range from 1 to 5 days.

A visit will usually involve:

- A brief opening meeting to clarify requirements and programme details
- A tour of appropriate areas of the manufacturing site(s)
- Examination of the control plan (see 'Guide to Control Plans, COP-E-GU-009) and audit of the controls defined in that plan to ensure compliance to legislation
- Examination of how change control is handled
- 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 either left at the time of audit, or sent within 5 days after the completion of the audit. Any non-conformances (NCs) will be identified during the audit and a summary of the NCs will be left during the closing meeting.

The closure time scales will be agreed at the end of the audit, and the auditor and technical team will be available to review your closure evidence and discuss suitability.

## How could non-conformances affect my ability to produce?

In the case of an initial audit, serious NCs (classed as major) would prevent the issue of the Approval applied for until they were closed with reference to the root cause, and may require a follow-up visit to verify rectification. Similarly major NCs on a monitoring visit would be referred to VCA senior management, would need to be rectified within an agreed timescale and could lead to an immediate request to cease production..

Minor NCs would require closure within an agreed time scale. Failure to close NCs with effective identification of the root cause, and good corrective and preventative actions would lead to withdrawal of COP and ultimately withdrawal of Type Approval.

## What happens if a CoP Test indicates a non-compliance?

One of the systems we would expect to see 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 an approved laboratory (eg. seat belts), we should be informed immediately and will discuss and agree necessary action.

## What Standard has to be achieved?

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 the 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 2007/46, and in the case of ECE Regulations, Appendix 2 of E/ECE/324-E/ECE/TRANS/505/Rev.2

## What is expected of the small Business?

We appreciate that a small business will not be able to operate controls such as those in large global operations, and the CoP auditors will discuss each situation according to the circumstances. Nevertheless, the responsibility for quality must be clearly defined and appropriate systems seen operating.

## What does it cost?

The maximum cost of an audit is set in Fees Regs 2009 No.719 paragraph 17 and fee number 60028, however a quote will be provided by the CoP department before work commences.

## Further advice

If you have any other questions in relation Conformity of Production, our CoP Technical Officers are always prepared to discuss them with you. Please do not hesitate to contact VCA to explain your particular situation.