

# UK Conformity of Production (CoP) (GB / UK(NI))

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# UK CoP (GB / UK(NI))

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# UK CoP (GB / UK(NI))

## 1. Introduction

# UK CoP (GB / UK(NI))- Introduction

## Scope

- ▶ This seminar will only cover CoP requirements and will not include Type Approval Technical requirements
- ▶ UKCA marking will not be covered either – for this please refer to Department of Business, Energy and Industrial Strategy (BEIS)

# UK CoP (GB / UK(NI))- Introduction

## General housekeeping

- ▶ There is time allocated at the end for questions
- ▶ Copies of the slides will be added to the VCA website under the CoP section after these seminars

# UK CoP (GB / UK(NI))- Introduction

## Who are VCA?

- ▶ Executive Agency of the Department for Transport
- ▶ UK Type Approval Authority for ECE, GB and UKNI
- ▶ Consist of Technical service and Approval Authority
- ▶ Offices in 9 countries around the world with Headquarters in Bristol, United Kingdom
- ▶ Technical service for STA, RDW

# UK CoP (GB / UK(NI)) - Introduction

## GB and UKNI – What are the differences?

- ▶ Great Britain (GB) is England, Scotland and Wales
- ▶ United Kingdom(UK) is GB and Northern Ireland
- ▶ GB approvals can only be used in GB
- ▶ UKNI approvals are currently valid in NI and GB
- ▶ However, a vehicle with UKNI approval can also hold a GB approval
- ▶ EU type approval currently accepted in NI

# UK CoP (GB / UK(NI)) - Introduction

## General points

- ▶ VCA CoP audits will cover ECE/ GB / UKNI and EU (tech service activity) in one visit
- ▶ Clearances from EU Member States to cover EU approvals will not be accepted for GB / UKNI
- ▶ VCA are the only appointed technical service for CoP – EU Member State clearances that mention “National Approvals” do not cover GB / UKNI
- ▶ VCA have already begun increasing the size of the CoP department to meet the increased demand



# UK CoP (GB / UK(NI)) - Introduction

## Relevant Legislation

The Road Vehicles (Approval) Regulations 2020 (Statutory Instrument 2020 No. 818 (as amended))

The Motorcycle (Type Approval) Regulation 2018 (Statutory Instrument 2018 No. 235)

The Agricultural and Forestry Vehicles (Type Approval) Regulations 2018 (Statutory Instrument 2018 No. 236)

All can be found on <https://www.legislation.gov.uk/>

# UK CoP (GB / UK(NI)) - Introduction

## Expected Implementation Dates

1<sup>st</sup> January 2023

- GB Type Approval compulsory for M & N (New types and provisional over 2 years old)
- Provisional GB Type Approval compulsory for NRMM, O and Components
- CoP required for M & N category approval holders

1<sup>st</sup> June 2023

- GB Type Approval compulsory for L & T category vehicles (New types and provisional over 2 years old)
- CoP required for L & T category manufacturers

1<sup>st</sup> January 2024

- GB Type Approval compulsory for NRMM, O and Components intended for Whole Vehicle (New Types and Provisional over 2 years old)
- GB Type Approval compulsory for Components intended for aftermarket (New Types)
- CoP required for NRMM, O category vehicles and component manufacturers


# UK CoP (GB / UK(NI)) - Introduction

## CoP for GB / UKNI – General Outline

For all categories, CoP will be implemented in 3 phases

|         |                                       |
|---------|---------------------------------------|
| Phase 1 | Declaration letter                    |
| Phase 2 | Scoping meeting and initial clearance |
| Phase 3 | On-going clearance                    |

# UK CoP (GB / UK(NI)) – Phase One



2. Phase One  
Declaration letter

# UK CoP (GB / UK(NI)) – Phase One

## Phase One Outline

- ▶ Phase One of GB/UKNI CoP will commence Q1 2022 for M,N, L, T and Q1 2023 for NRMM, O and components
- ▶ It will consist of a declaration letter signed by a duly appointed representative of the manufacturer
- ▶ A template will be supplied by UK VCA CoP department
- ▶ This template will be sent by email to address supplied at time of provisional GB approval application (“p” number)
- ▶ The declaration will need to cover all “p” approvals held
- ▶ THIS PHASE DOES NOT APPLY TO EXISTING VCA COP HOLDERS

# UK CoP (GB / UK(NI)) – Phase One

## Phase One Detail

- ▶ As “p” approvals are adoptions of “e” approvals it is clear that CoP is in place with the EU member state that issued the “e” approval
- ▶ CoP held with the EU member state only needs to consider product placed on the market in Europe
  - ▶ GB specification may not be fully covered
  - ▶ Member state may not consider recalls etc for GB

# UK CoP (GB / UK(NI)) – Phase One


## Phase One Detail

- ▶ VCA need assurance that they will be contacted in the event of a recall being required in GB (Vehicle Safety Branch are part of a separate agency – DVSA)
- ▶ Additionally, we need confirmation that any CoP action required on product placed on the market in GB will be covered in the “e” member state CoP or by other means
- ▶ This also includes any periodic tests on GB specification vehicles if these differ from EU specification

# UK CoP (GB / UK(NI)) – Phase One

## Phase One Detail

- ▶ Declaration likely to take format similar to that shown here (in draft form)
- ▶ Approval holder will be that named on the “p” approval not local sales
- ▶ Detail will be needed as to whether GB CoP is covered by the EU work or separately
- ▶ Needs to be returned to UK VCA CoP department

|   |   |  |
|---|---|--|
| <br>Vehicle<br>Certification<br>Agency | VCA Headquarters<br>1 The Eastgate Office Centre<br>Eastgate Road<br>Bristol, BS5 6XX<br>United Kingdom | T +44 (0)300 330 5797<br>F +44 (0)300 003 2198<br>E <a href="mailto:enquires@vca.gov.uk">enquires@vca.gov.uk</a><br><a href="http://www.dft.gov.uk/vca">www.dft.gov.uk/vca</a> |
|---|---|--|

[APPROVAL HOLDER]  
[ADDRESS]

[DATE]

To whom it may concern,

**Conformity of Production (CoP) Declaration for GB Vehicles**

We, [APPROVAL HOLDER], hereby confirm that all vehicles being entered into the GB market through the Provisional GB Type Approval Scheme are included in monitoring and testing activities being undertaken as part of the EU Conformity of Production process, or through an additional process.

[PROVIDE DETAIL]

Any concerns raised through the CoP Process will be highlighted to the appropriate EU Type Approval Authority or Technical Service and any issues specifically relating to vehicles registered in the GB Market are communicated to VCA at the earliest opportunity.

Best regards,

[SIGNATURE]

[NAME OF RESPONSIBLE PERSON]  
[JOB TITLE]  
On behalf of [APPROVAL HOLDER]



# UK CoP (GB / UK(NI)) – Phase One

## Phase One Reporting

- ▶ UK VCA CoP will be the point of contact if issues are found
- ▶ We may require additional action and reporting over that being undertaken with the EU member state

# UK CoP (GB / UK(NI)) – Phase One

## Phase One Output

- ▶ Acknowledgement will be sent by VCA UK CoP team to the responsible person who signed the document
- ▶ This will act as “provisional” CoP which will remain sufficient until full GB approvals are required
- ▶ Full GB CoP will need to be in place before approvals will be issued to the full scheme regardless of whether the compulsory date has been reached
- ▶ VCA will not charge for issuing the provisional clearance

# UK CoP (GB / UK(NI)) – Phase Two



3. Phase Two

Scoping / Initial GB CoP Clearance

# UK CoP (GB / UK(NI)) – Phase Two

## Phase Two Outline

- ▶ Phase Two of GB CoP will be required before Jan 2023 for M,N, June 2023 for L, T and Jan 2024 for NRMM, O and components (or at the point your provisional approval expires)
- ▶ It will be needed before any full GB approvals can be issued regardless of the above dates
- ▶ It will consist of a scoping meeting with a member of the VCA CoP team which will include setting out an audit plan for the clearance period
- ▶ Scheduling of update meetings will be required along with a scheduling of on-site and remote audits for assembly plants
- ▶ This will be your initial GB CoP clearance
- ▶ Required for new and existing VCA CoP holders although if number of sites and the approval structure is simple (ie manufacturer = only assembly plant) this may be a quick exercise

# UK CoP (GB / UK(NI)) – Phase Two

## Phase Two Detail – Scoping Meeting

- ▶ It will be paramount that VCA understand how your GB approvals will be administered

Areas likely to be covered include:

- ▶ Who will be the approval holder
  - GB sales division
  - Same as EU approval
- ▶ Who is the manufacturers representative and what is their role
  - Do they apply for the approvals
  - How much involvement in the process do they have – CoP implications
- ▶ Which assembly sites are going to be on the approvals
  - Is this as the EU approval(s) or is it a smaller number of sites that supply the GB market

# UK CoP (GB / UK(NI)) – Phase Two

## Phase Two Detail – Scoping Meeting

Areas likely to be covered (cont.):

- ▶ How will the approval holder demonstrate there are responsible for CoP
  - Control plans and testing
  - Change control
- ▶ How will CoC's be generated and by whom
  - GB generated or by EU holder
- ▶ Activities conducted by importers
  - Implications if parts fitted (inc. VIN plates)
  - May need adding to CoP clearance as assembly plant

# UK CoP (GB / UK(NI)) – Phase Two

## Phase Two Detail – Scoping Meeting

- ▶ Along with the information gathered a schedule will need to be determined for the clearance period
- ▶ An on-site audit at each assembly plant will be scheduled for completion within 3 years
- ▶ Sites not physically visited in any year will be subject to a remote audit
- ▶ For vehicle manufacturers, an annual meeting with the approval holder will be scheduled to cover non-assembly plant items (i.e. RMI, CoC's, CoP test data)
- ▶ For manufacturers with emissions approvals, ¼ ly meetings scheduled with the CoP holder to “keep in touch”

# UK CoP (GB / UK(NI)) – Phase Two

## Phase Two Detail

- ▶ Phase 2 can be completed before GB CoP clearance commences (i.e. CoP clearance can be started at a later date)
- ▶ If there is a gap between the scoping meeting and the need for full GB CoP, an update meeting will be needed before the clearance commences to confirm any changes
- ▶ It is recommended that you schedule this meeting in advance of requiring clearance to avoid the rush



# UK CoP (GB / UK(NI)) – Phase Two

## Phase Two Output

- ▶ A certificate will be issued detailing the dates, sites and subjects covered
- ▶ This certificate will be subject to the scheduled meetings and audits being conducted. Failure to do so will have the clearance revoked
- ▶ The scoping meeting will be charged at £89/hr



# UK CoP (GB / UK(NI)) – Phase Three

A large, stylized number '3' in a dark green color, with a white outline, serving as a background for the text.

4. Phase Three

GB CoP Clearance

# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Outline

- ▶ Will follow on directly from Phase Two
- ▶ Will be application of Phase Two and will become regular clearance method
- ▶ Required for new and existing VCA CoP holders
- ▶ Consists of:
  - 1/4ly meeting (vehicle manufacturers with emissions approvals)
  - Annual review (vehicle manufacturers)
  - On-site audits of assembly plants
  - Remote audits of assembly plants

# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Detail – 1/4ly meeting

- ▶ Likely to be conducted with the approval holder but could be manufacturers representative
- ▶ Required for all vehicle manufacturers with emissions approvals
- ▶ “Touch point” to understand upcoming changes (sites, scopes, names)
- ▶ Cover progress against testing requirements (emissions)
- ▶ Aim is to reduce last minute problems
- ▶ Informal discussion and not audit
- ▶ Should be around 1 hour in duration
- ▶ Likely to be conducted via videocall
- ▶ Short video calls will not be charged
- ▶ Could be required for other subjects in the future

# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Detail – Annual meeting

- ▶ Likely to be conducted with the approval holder but could be manufacturers representative
- ▶ Separate from any audits conducted at the approval holder if this is also an assembly plant
- ▶ Required for all vehicle manufacturers

## Areas to be covered

- ▶ ISO performance / Audit results
  - NC's raised
  - RC / CA / PA
- ▶ CoP test schedules
  - Completion rates for proceeding year
  - Schedule for upcoming year
- ▶ Test data sampling
  - Review of tests conducted (non-emissions)
  - Sample of test reports (internal and external)

# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Detail – Annual meeting

### Areas to be covered (Cont.)

- ▶ Recalls / Non-compliance
  - Completion rates of campaigns
  - Non-conformances identified during CoP tests
- ▶ Certificates of conformity
  - Check of content (One per vehicle type minimum)
- ▶ RMI and OBD
  - Access to information
  - Updates
- ▶ Audit / meeting schedule for coming year

# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Detail – Remote audits

- ▶ All assembly plants will need auditing
- ▶ Approval holder representative may be in attendance (recommended)
- ▶ Will be conducted annually on years where on-site audits are not conducted
- ▶ Will be a video call
- ▶ Will cover elements of QMS (ie calibration, competency)
- ▶ Will look at application of control plans and CoP testing against schedule
- ▶ Will cover change control with respect to type approval
- ▶ May sample CoP tests
- ▶ Will look at non-conformance reports for internal items

# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Detail – Remote audits

- ▶ Video call likely to last no more than 4 hours
- ▶ Paperwork will be requested prior to audit
- ▶ NC's may be raised and will require closing
- ▶ Directly relates to assembly plant clearance
- ▶ Risk rating may require on-site audit sooner than scheduled
- ▶ Will be charged at £890 / site



# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Detail – On-site audits

- ▶ All assembly plants will need auditing min. once every 3 years
- ▶ Approval holder representative may be in attendance (recommended)
- ▶ Will cover elements of QMS (ie calibration, competency)
- ▶ Will look at application of control plans and CoP testing against schedule
- ▶ May sample CoP tests
- ▶ Will cover change control with respect to type approval
- ▶ Will look at non-conformance reports for internal items

# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Detail – On-site audits

- ▶ Audit will be 1 or 2 days dependent on facility size
- ▶ Paperwork will not be requested prior to audit
- ▶ NC's may be raised and will require closing
- ▶ Directly relates to assembly plant clearance
- ▶ Risk rating may require on-site audit sooner than previously scheduled. This may include bringing forward other site audits
- ▶ Charge will be £1295 for 1 day or £1785 for 2 days (plus travel costs outside of UK)

# UK CoP (GB / UK(NI)) – Phase Three

## Phase Three Output

- ▶ Detailed audit report
- ▶ Certificate validity remains
- ▶ If significant non-conformances are identified that effect the risk rating, a new certificate may be issued with a reduced clearance period
- ▶ If NC's are raised and not closed, the assembly site in question is likely to be withdrawn from the clearance

## 5. On-going clearance

# UK CoP (GB / UK(NI)) – Ongoing Clearance

## On-going clearance

- ▶ Will follow Phase 3
  - ▶ Annual meeting (where applicable)
  - ▶ ¼ ly meeting (where applicable)
  - ▶ On-site audits
  - ▶ Remote audits
- ▶ Dependent on risk, will follow 3-year cycle
- ▶ All applicable elements will need to be conducted to gain and retain clearance

# UK CoP (GB / UK(NI)) – Ongoing Clearance

## On-going clearance

- ▶ VCA will contact you prior to make arrangements for your required visit by email
- ▶ If unsuccessful, we will follow up with a letter
- ▶ If still unsuccessful, you will be sent a letter notifying you of impending withdrawal
- ▶ If no response is still received, your CoP and approvals will be withdrawn

**Highly important your contact details are kept up-to-date**

# UK CoP (GB / UK(NI)) – Ongoing Clearance

## On-going clearance – Amendments and additions

- ▶ You will need to inform us of any changes to your name, addresses, subject list (scope), representatives etc
- ▶ Any approvals you apply for will not be issued unless all details match
- ▶ Updates may be conducted outside of other activities at any time and will incur a separate charge
- ▶ Please use 1/4ly and annual meetings to make us aware of upcoming changes

***The earlier we are aware the more likely we will be to meet your deadlines***

## 6. CoP Test Data



# UK CoP (GB / UK(NI)) – CoP Test Data

## General

- ▶ VCA will accept data used to demonstrate compliance to EU certificates where the vehicle specification and technical requirements are the same
- ▶ VCA will need access to the data direct from the manufacturer
- ▶ Approval Holder will need to have oversight of all tests that relate to the GB scheme CoP
- ▶ GB / UKNI Legislation unlikely to give an indication of CoP test requirements or frequency for every subject. ECE Regs may offer some guidance
- ▶ In all other cases, frequency and nature of tests will be dependent on the nature of the subject / product and perceived risk. This is to be agreed with the CoP department and included in your Control Plans
- ▶ Test data will be reviewed at annual meetings and assembly plant audits

# UK CoP (GB / UK(NI)) – CoP Test Data

## Engine Emissions

- ▶ VCA will review engine emissions CoP test data at 1/4ly and annual meetings
- ▶ Details yet to be finalized on sales volumes etc

## Test Data Non-conformities

- ▶ Please contact us as soon as possible so that we can work together to resolve any issues
- ▶ We have templates to be completed for emissions subjects and other subject areas
- ▶ Follow up actions (ie recall) will be tracked to completion
- ▶ Root cause, corrective action and preventative action information will be required

## 7. Application Process

# UK CoP (GB / UK(NI)) – Application Process

- ▶ If you are not an existing VCA customer you will need to set up an account with us. A Customer Account Application Form can be found in the publications area of our website
- ▶ When you are ready to undertake your phase 2 scoping meeting, please contact VCA CoP (UK)
- ▶ Please direct all correspondence regarding GB CoP to [copmailbox@vca.gov.uk](mailto:copmailbox@vca.gov.uk)
- ▶ In the future, large manufacturers may be allocated a Senior Compliance Engineer to co-ordinate their work

## 8. CoP Timeline

# UK CoP (GB / UK(NI)) – CoP Timeline

|                     | 2022    |    |    |         | 2023    |         |         |         | 2024    |    |    |    |
|---------------------|---------|----|----|---------|---------|---------|---------|---------|---------|----|----|----|
|                     | Q1      | Q2 | Q3 | Q4      | Q1      | Q2      | Q3      | Q4      | Q1      | Q2 | Q3 | Q4 |
| M, N,               | Phase 1 |    |    | Phase 2 | Phase 3 |         |         |         |         |    |    |    |
| L, T                | Phase 1 |    |    |         |         | Phase 2 | Phase 3 |         |         |    |    |    |
| NRMM, O, components |         |    |    |         | Phase 1 |         |         | Phase 2 | Phase 3 |    |    |    |

M, N

Phase 1 Q1 2022, Phase 2 Q2 2022 to end Q4 2022, Phase 3 start Q1 2023 onwards

L, T

Phase 1 Q1 2022, Phase 2 Q2 2022 to end Q2 2023, Phase 3 start Q3 2023 onwards

NRMM, O, Components

Phase 1 Q1 2023, Phase 2 Q2 2023 to end Q4 2023, Phase 3 start Q1 2024 onwards

Note: Phase 2 and 3 dates may be delayed until expiry of your provisional approval

## 9. Summary



# UK CoP (GB / UK(NI)) – Summary

- ▶ CoP for GB/UKNI will be in three phases
- ▶ Phase 1 will consist of a manufacturer's declaration
- ▶ Phase 2 will be a scoping meeting and initial clearance based on scheduled visits and meetings
- ▶ Phase 3 will be meetings and a mixture of on-site and remote audits
- ▶ All sites will be audited every year (2 remote then 1 on-site in a three-year cycle)
- ▶ Please direct all correspondence regarding GB CoP to [copmailbox@vca.gov.uk](mailto:copmailbox@vca.gov.uk)

## 10. Questions