



Vehicle  
Certification  
Agency

# GB Type Approval Scheme Seminar

21<sup>st</sup> June 2022



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# Introductions and domestics

Chris McCabe and Bob Morris



# Introductions

## Chris McCabe – Chief Technical & Statutory Operations Officer

- Overall responsibility for VCA's Type Approval Authority activities

## Peter Housden-Rowe – Head of Regulatory & Technology Group

- Responsible for technical policy, regulatory affairs and Technical Service designation

## Sean Morris – Head of Statutory Operations

- Responsible for policy and operational delivery of VCA's Type Approval Certification and Conformity of Production (CoP) activities



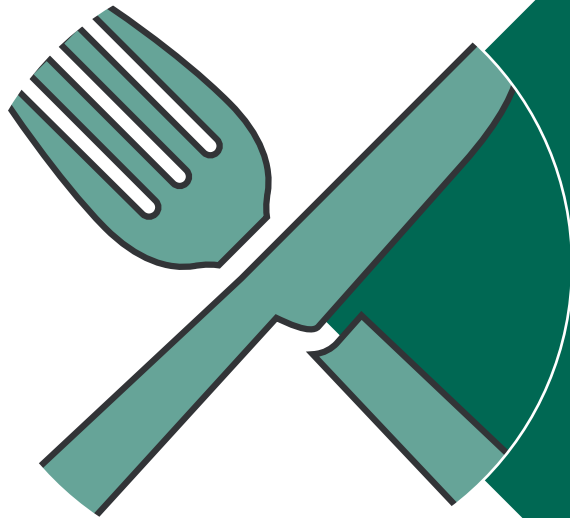
## Agenda

### Morning Session

- 09:00 – 09:10 : Introductions & domestics
- 09:10 – 09:45 : Legislation, scope and timing of GB type approval scheme
- 09:45 – 10:30 : GB type approval application process
- **10:30 – 11:00 : Refreshments break**
- 11:00 – 11:30 : Technical Service Policy
- 11:30 – 12:00 : Application of the GB Provisional approval scheme



## Agenda (cont.)



12:00 – 12:45  
Lunch Break



## Agenda (cont.)

### Afternoon Session

- 12:45 – 13:00 : Whole vehicle type approval in the GB scheme
- 13:00 – 13:15 : System and component approval in the GB scheme
- 13:15 – 13:45 : Subject deep dive – AES/BES technical review
- 13:45 – 14:05 : Subject deep dive – In-Service Conformity
- 14:05 – 14:30 : Subject deep dive – HD CO2 approvals
- **14:30 – 15:00 : Refreshments break**
- 15:00 – 15:15 : Policy & plans for non-retained legislation
- 15:15 – 16:00 : Conformity of Production
- 16:00 – 16:30 : VCA Business Transformation Programme
- 16:30 – 16:45 : Closing Remarks
- 16:45 - 17:30 : Informal Q&A



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# Legislation, scope & timing of GB type approval scheme

Peter Housden-Rowe



## GB and UK(NI) Approval Schemes



Two approval regimes within the UK in accordance with the Northern Ireland Protocol (NIP), GB scheme and UK(NI) scheme



VCA are the Type Approval Authority in both cases and can issue certificates under either scheme



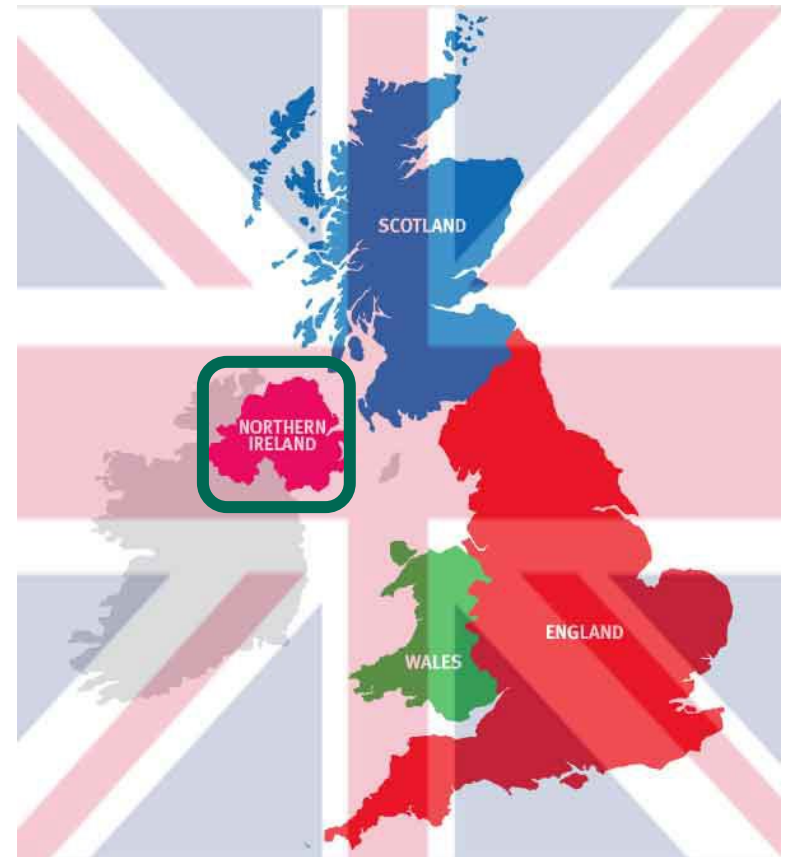
Location of a manufacturer does not affect eligibility for either scheme





## Approvals for Northern Ireland

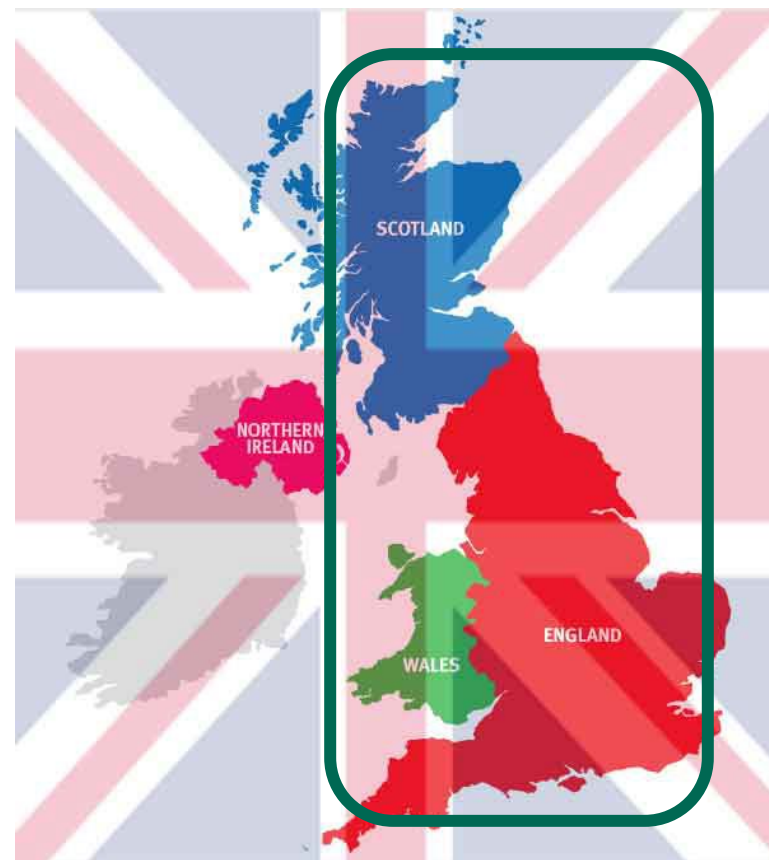
- ▶ Type approval in this region follows EU law
- ▶ A manufacturer registering vehicles in this region can present either:
  - ▶ A UK(NI) type approval issued by VCA
  - ▶ An EU type approval issued by an EU member state





## Approvals for Great Britain

- ▶ A manufacturer registering vehicles in this region can present either:
  - ▶ A GB approval. These can only be used in GB.
  - ▶ UK(NI) approval. UK(NI) approvals are currently valid in NI and GB.
- ▶ Please note, a vehicle with UK(NI) approval can also hold a GB approval.





## Legislative Status

GB type approval is based on EU legislation as it was retained in UK law on 31<sup>st</sup> December 2020

New Statutory Instrument (SI) in development to correct deficiencies in retained EU Regulation 2018/858 and associated legislation

- This legislation will implement the full functional GB scheme
- Corrected deficiencies include references to “EU” and “European Commission”
- No technical changes at this stage

Transport Bill in development that will grant powers to make further changes to retained EU legislation, including new technical requirements where desired

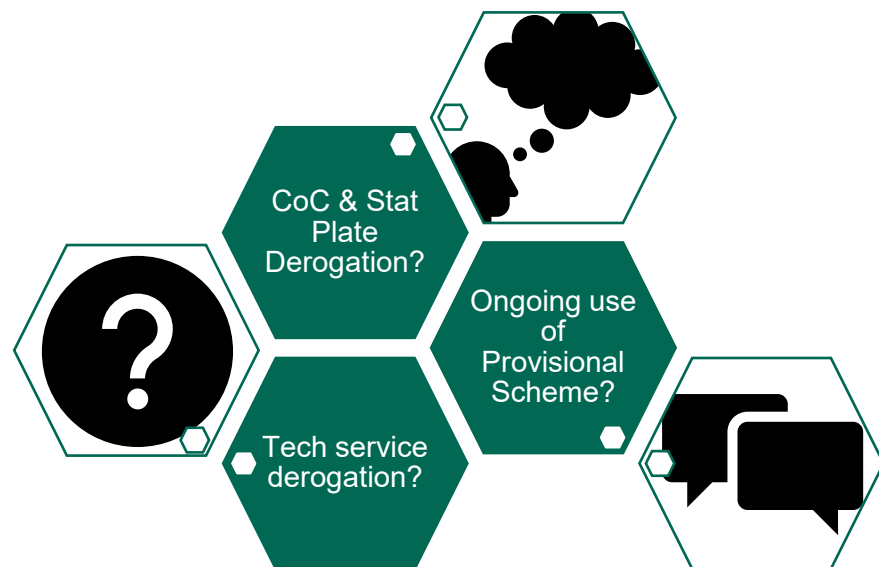


# Consultation

Consultation covering  
aspects of the forthcoming  
SI currently live

Consultation runs until 29  
June 2022

An opportunity to share your  
views on future scheme  
requirements!





# VCA's Information System for Type Approval (VISTA)

Library of GB Retained EU Legislation, UN Regulations and SIs

Contains consolidated versions of the legislation, giving clarity to regulatory changes

VCA technical interpretations providing detailed & unique regulatory interpretations directly from VCA, embedded into the legislation

For more information  
on **Vista@vca.gov.uk**

**SIGN UP!**



## Scope & Timings

Product	GB provisional type -approval applicable from	Full GB type-approval optional for new types of product built after these dates	Full GB type-approval applicable
Motorised road vehicles (category M and N)	1 <sup>st</sup> January 2021	1 <sup>st</sup> December 2022	1 <sup>st</sup> July 2023 for new types (and existing types where there is no GB provisional type-approval or that type-approval has expired).
Trailers (category O)	1 <sup>st</sup> January 2023	1 <sup>st</sup> December 2022	1 <sup>st</sup> July 2024 for new types (and where existing provisional approvals exceed 2 years).
Components* (for M, N, O categories – for use in Whole Vehicle)	Not Applicable	1 <sup>st</sup> December 2022	As needed for WVTa applications
Components* (Aftermarket for M, N and O categories)	1 <sup>st</sup> January 2023 for new types	1 <sup>st</sup> December 2022	1 <sup>st</sup> July 2024 for new types



# Approval Routes in the GB Scheme

Unlimited  
volumes full  
GB type  
approval

Unlimited Series

Replacing  
EU small  
series type  
approval but  
maintaining  
same  
requirements  
and limits

GB Medium Series

Maintained  
as per  
current  
requirements  
and  
numerical  
limits

National Small Series



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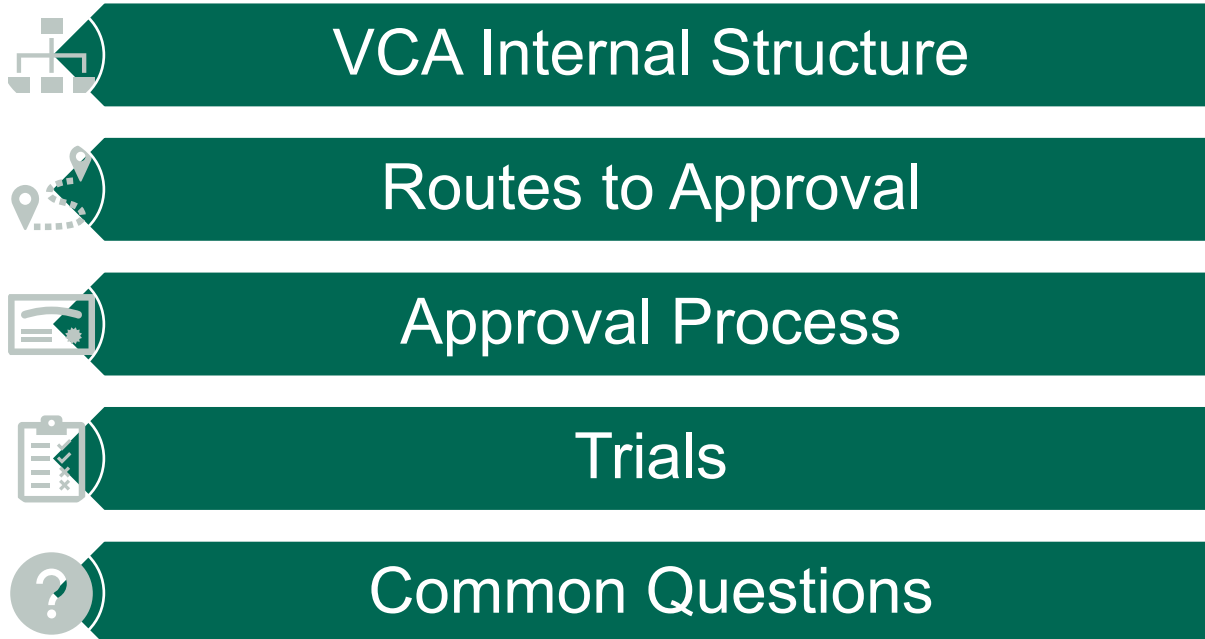
# GB Type Approval Application Process

Sean Morris



# GB Type Approval Application Process

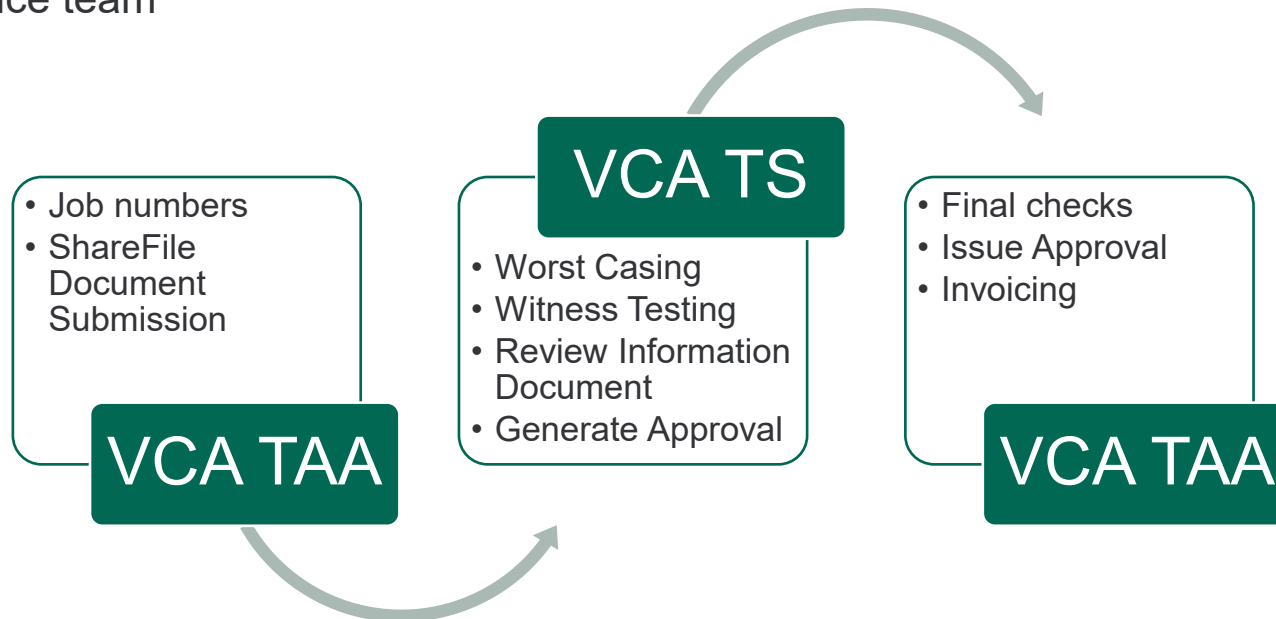
- ▶ The process for applying for a GB Type Approval may be different to how you work today, even if you are an existing VCA approval holder
- ▶ This section will cover:



# GB Type Approval Application Process

## ► VCA Internal Structure

- VCA is a combined Technical Service (TS) and Type Approval Authority (TAA)
- If you are an existing approval holder you are most likely to interact with our Technical Service team

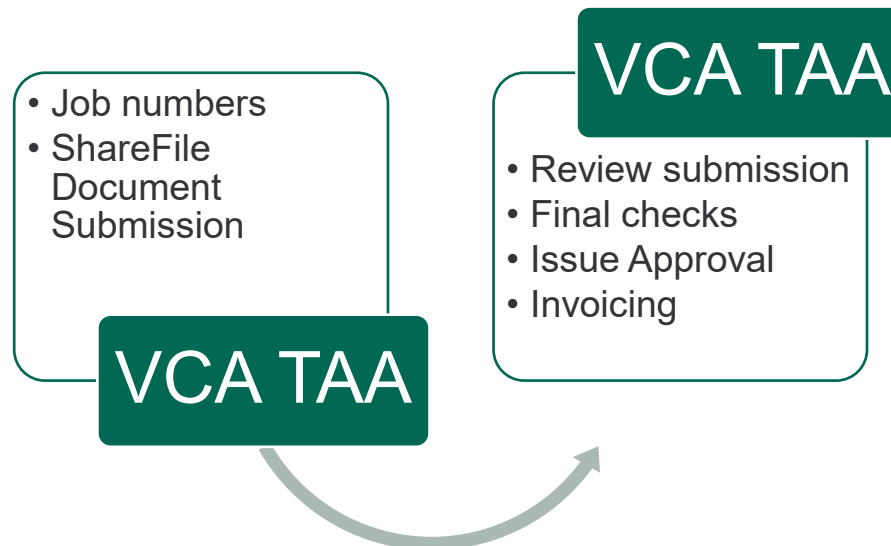




# GB Type Approval Application Process

## ► VCA Internal Structure

- You might work directly with the TAA today if you have applied for IVA without Inspection or GB Conversion IVA for vehicle imports

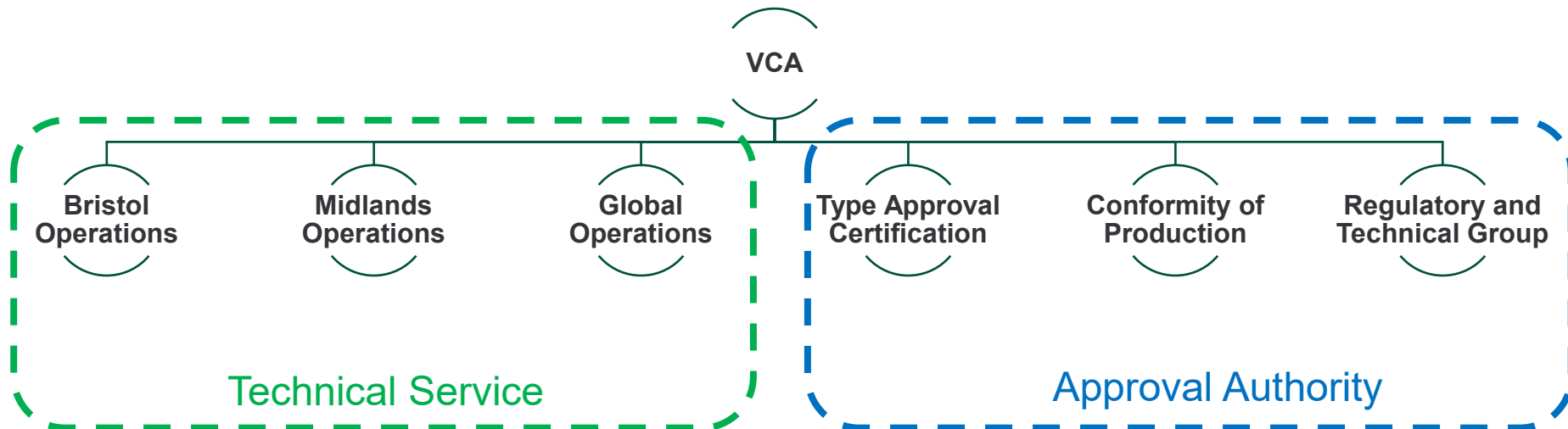




# GB Type Approval Application Process

## ► VCA Internal Structure

► Slightly simplified view of VCA:





# GB Type Approval Application Process

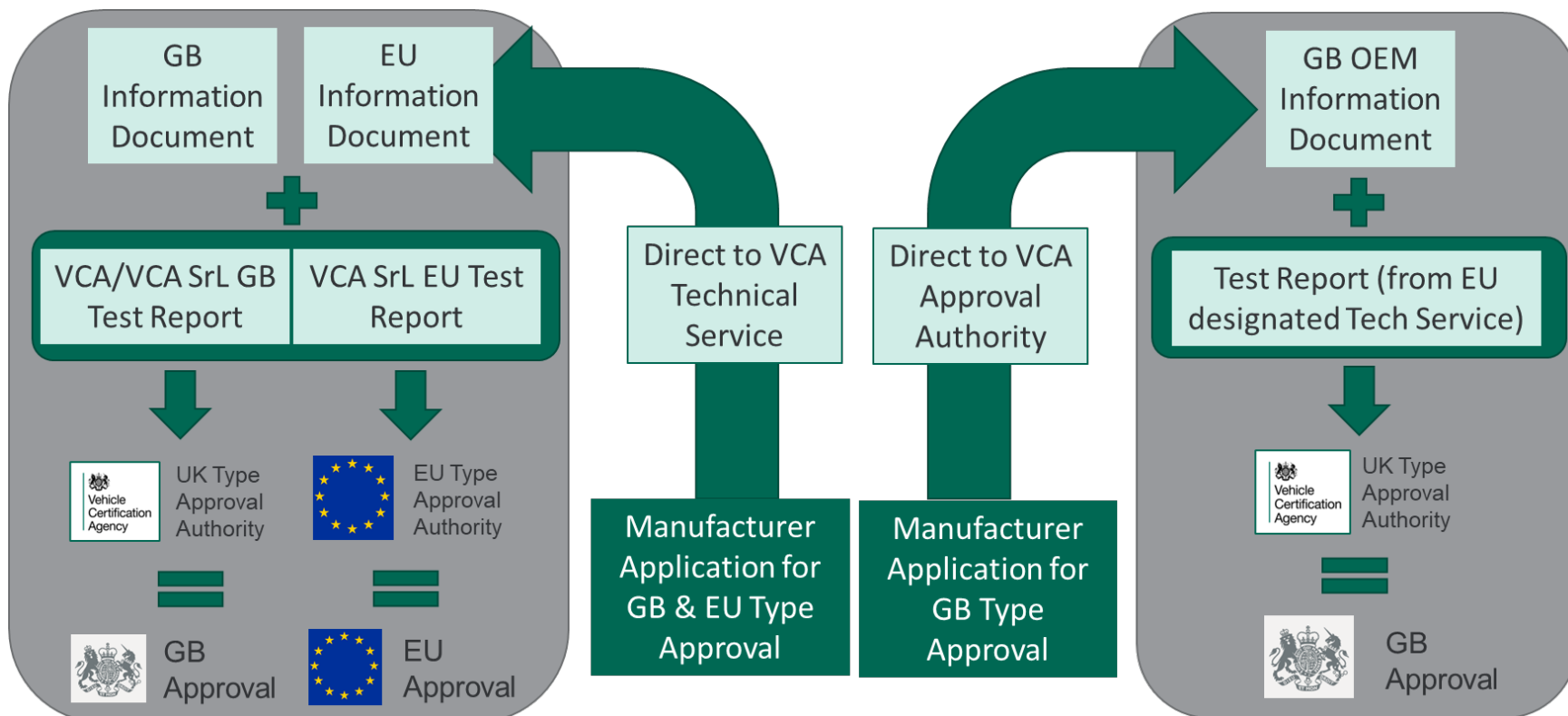
## ► Routes to Approval

- It will be possible to apply for a GB Approval in Two Ways:
  - Direct to TAA if you are not currently working with VCA
  - Through VCA TS if you are already working with VCA for EU/UN
- Aim to reduce any duplication with VCA testing
- Note that CoP is a parallel activity which will be discussed in more detail later



# GB Type Approval Application Process

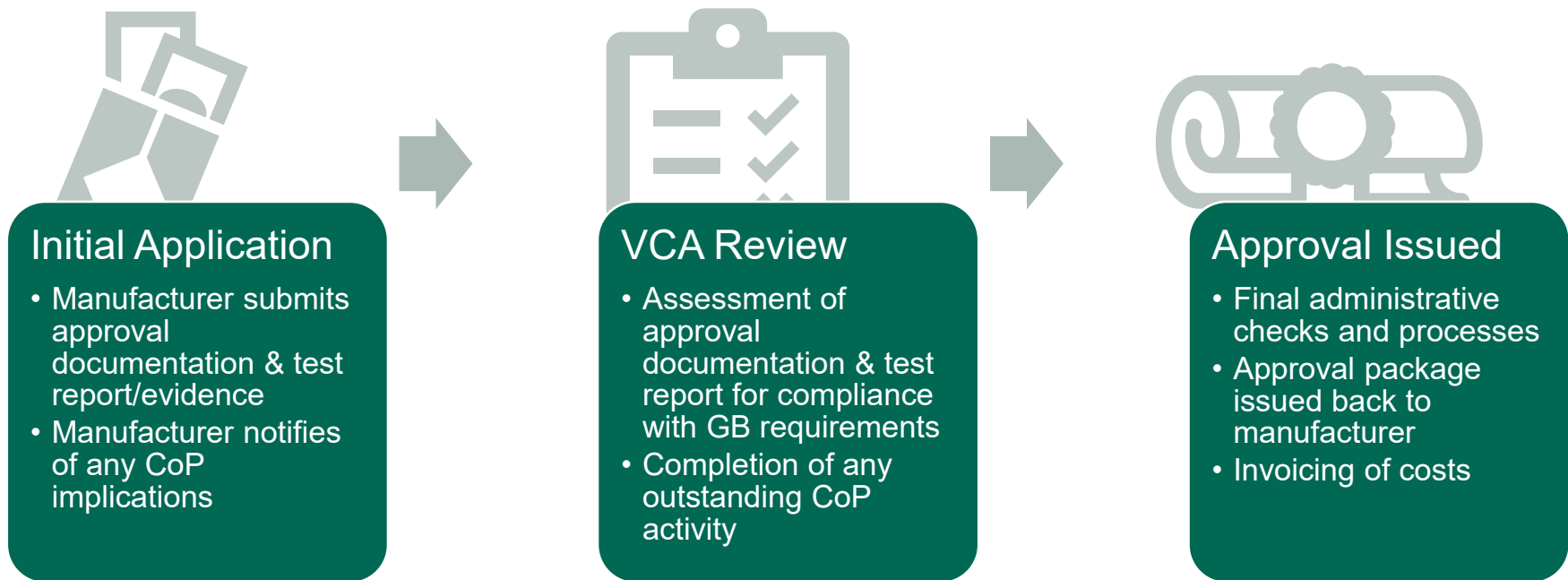
## ► Routes to Approval





# GB Type Approval Application Process

## ► Approval Process





# GB Type Approval Application Process

## ► Approval Process

- The initial application contains the Information Document and the Evidence
- Information document can be the EU copy with a GB cover page
  - Manufacturer's representative likely to be different
  - Statutory markings may be different
- Evidence:
  - Test reports from Technical Service (Next session will cover this in more detail)
  - Additional drawings or evidence as required





# GB Type Approval Application Process

## ► Approval Process

- For direct to TAA applications the **VCA Review** takes place entirely in the TAA side of the organisation
- Type Approval Certification Department:
  - Compliance checks will take place to review content against GB standards
- Regulatory and Technical Group:
  - Technical checks for key subjects such as emissions (AES/BES documentation)
- At the point the review is complete we would call this internally as being “Technically Cleared” or “Tech Clear” – you may have heard this term working with VCA before



# GB Type Approval Application Process

## ▶ Trials

- ▶ The direct to TAA route for a Whole Vehicle approval is new for VCA
  - ▶ Trials are being undertaken to better understand the operational impact and determine cost
  - ▶ This also links into a new system being developed which we will talk about later
- 
- ▶ Trial 1 - Provisional Scheme and GB Conversion IVA Users to test new system proof of concept – July and August
  - ▶ Pilot – Dummy GB Whole Vehicle applications to test our internal process and better understand timings and delivery needs - July
  - ▶ Trial 2 – Early GB Scheme Adopters to test new system to full GB Scheme requirements – Real Approvals – October to December – Approval held for legislation



# GB Type Approval Application Process

## ► Trials

- Much more detail coming later today on new system being developed
- Aligned to build readiness for launch of Full GB Scheme





# GB Type Approval Application Process

## ► Trials

- For Trial 2 we are planning on offering a booking system through our website which would allow us to schedule in planned applications and complete them within that week such that they are ready to issue immediately when legislation allows
- If you want to participate in the trial and ensure you have your GB approval early then please book slots and we will be in touch to arrange details
- We would appreciate feedback during trial but also after system is live to improve services



# GB Type Approval Application Process

## ▶ Common Questions

### ▶ How long will it take for my approval to be issued?

- ▶ Our current timeframes are 4 weeks from receipt to “Tech Clear” and 2 weeks to issued
- ▶ Our plan is to maintain this or make it quicker – trials will support this



Application  
Week 0



Tech Clear  
Week 4



Issue  
Week 6



# GB Type Approval Application Process

- ▶ **Common Questions**
- ▶ **Who should apply for a GB Approval?**
- ▶ Applications could be received from either the approval holder or their appointed representative. So it could be HQ or the UK entity depending on what works best for you.
- ▶ **How much will it cost?**
- ▶ VCA remain governed by a Statutory Instrument defining our Certificate fees
- ▶ Administrative fee intending to be fixed price and will be determined following the trials
- ▶ VCA should cover its cost and break-even so aiming to keep costs as low as possible



# GB Type Approval Application Process

## ▶ Common Questions

### ▶ Can I request a provisional S&C GB Approval number to help with Part III?

- ▶ This is within the specification of the new system to provide this functionality. It is our intention that this is possible.

### ▶ Can I use my EU Information Document?

- ▶ Not on its own as there will be elements of GB requirements missing from the EU information document, however the EU document could be used with a GB cover page identifying the differences.

### ▶ Can I use EU TS Test Reports for a Single Step Approval (Multi-stage)?

- ▶ Yes



# GB Type Approval Application Process

## ▶ **Key Takeaways:**

- ▶ VCA is a combined Technical Service and Approval Authority
- ▶ If you are currently using the VCA Technical Service then you can continue to work with us in the normal way for GB Type Approval
- ▶ If you are not currently using the VCA Technical Service then you will be working with the Approval Authority side of VCA for GB
  - ▶ The TAA will review applications and evidence provided
- ▶ Trials are taking place to test systems and ensure readiness





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# Technical Service Policy

Peter Housden-Rowe

# General Principles for GB Scheme



Technical Service requirements are as set out in Regulation 2018/858 as retained



Some legislative deficiencies addressed for GB scheme:

- Technical Services may be based in either GB or EU
- “Joint Assessment” of as part of Technical Service designation removed



GB Scheme Technical Service Status is not linked to UNECE Technical Service status



# Technical Service Derogation



A derogation will permit VCA to accept test reports from EU Technical Services for an initial period – until December 2025 (subject to consultation)



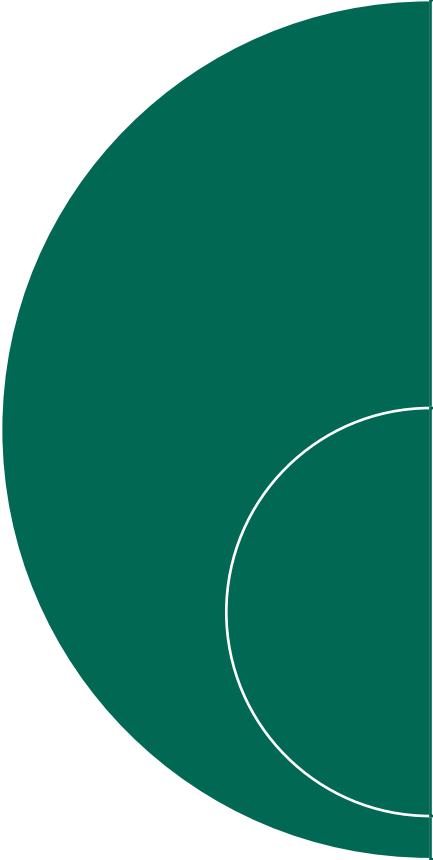
VCA will use this period to build understanding of approval volumes and resource needs to inform future Technical Service designation plans



VCA will not be designating GB Technical Services prior to this review – applications will open at a later date



## Category C Technical Services



VCA do not intend to designate external  
Category C (Conformity of Production)  
Technical Services for the GB Type  
Approval Scheme

Retaining internal handling of Conformity  
of Production enables VCA to have better  
visibility and control of non-compliances  
and issues with GB type approvals




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# Application of the GB Provisional approval scheme


Peter Housden-Rowe

## Current Approach

GB Provisional approval is granted on the basis of valid EU type approval for a given vehicle type

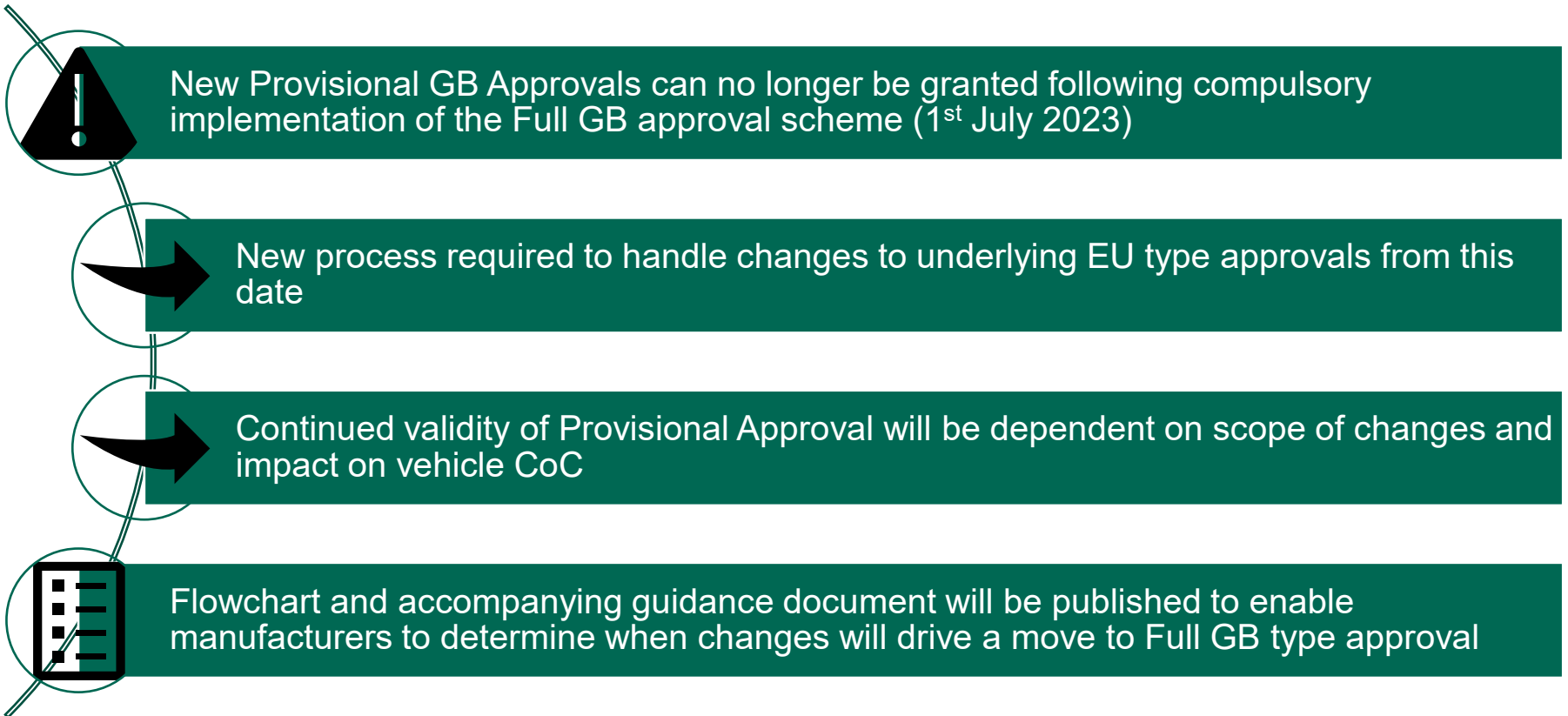


Extensions to the underlying EU type approval invalidate the current GB Provisional approval as the specification has changed



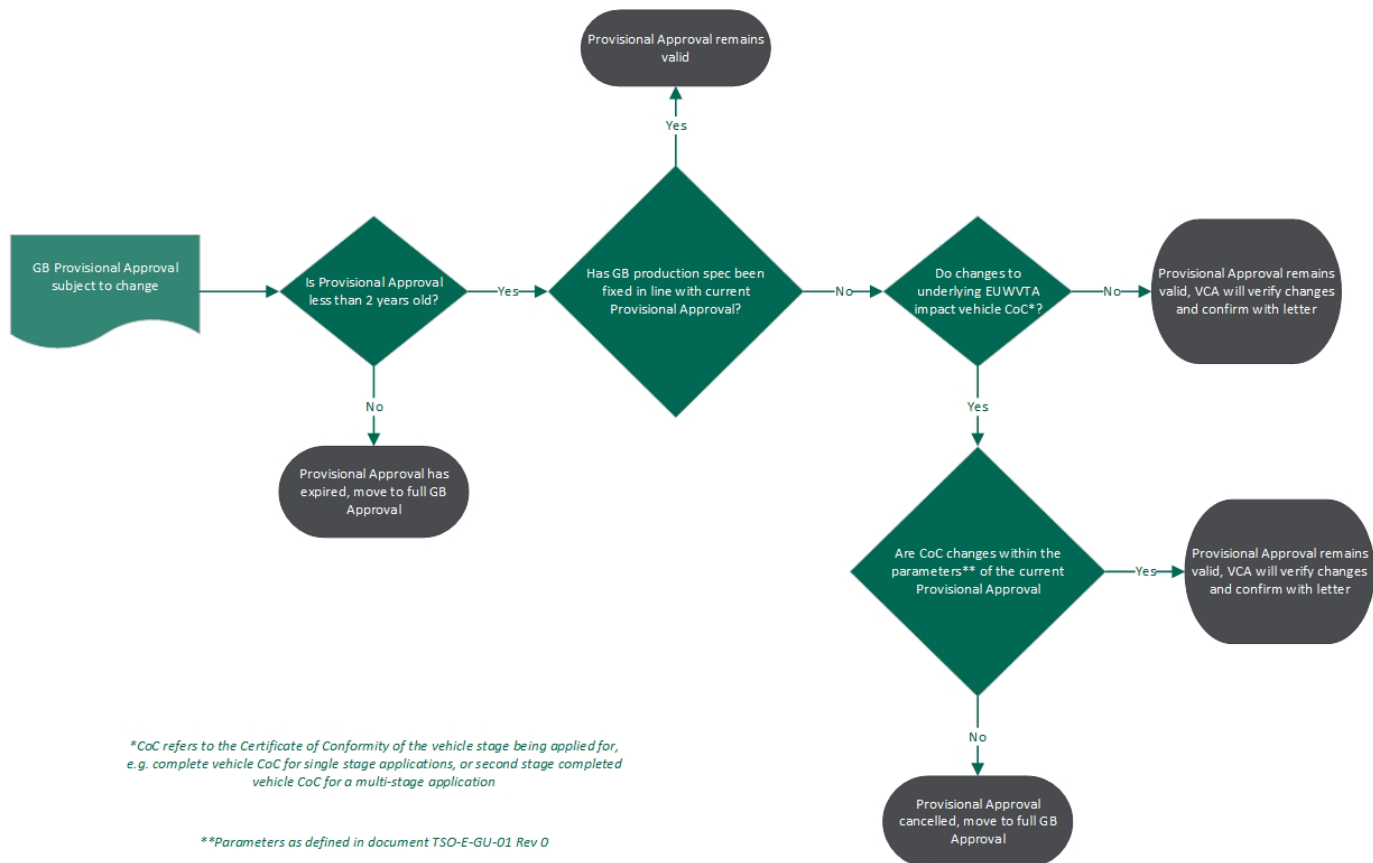
VCA issue a new GB Provisional approval based on the latest extension of the underlying EU type approval

# Future Provisional Type Approval Process





# Future Provisional Type Approval Process (cont.)







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# Whole Vehicle Type Approval in the GB Scheme

Peter Housden-Rowe

## Options for Whole Vehicle Type Approval

### Step-by-step

- Approval application consists of full set of GB or UN type approval certificates covering vehicle systems, components & STUs

### Single-step

- Single application covering all aspects of a vehicle type in one operation

### Mixed Approach

- Hybrid approach where some vehicle systems are approved during the WVTA application rather than having separate system approvals



## WVTA Inspections



No additional physical WVTA inspection required to obtain GB type approval where compliance of all required vehicle systems, components and STUs for the given application have been confirmed by provision of necessary test reports



## Certificate of Conformity (CoC)

Vehicle CoC will need to be provided in accordance with template set out in retained Regulation 2020/683

Recent changes to EU legislation in this regard cannot be captured in retained GB legislation at this time

Derogation proposed to enable manufacturers more time to adapt to GB CoC template by continuing to use EU CoC for a limited period – please share your views via the consultation!



## Multi-Stage Applications

Requirements as per retained Regulation 2018/858

Initial derogation period during which incomplete and complete vehicle EU approvals can be used as part of a multi-stage application

- VCA will develop processes to handle administrative EU to GB changeover in referenced previous stage approvals with minimal impact

Initial derogation period subject to consultation – please share your views!



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# System and component approval in the GB scheme

Peter Housden-Rowe



## Applicable GB Approval Subjects

Sound levels  
(540/2014)

Light duty  
emissions  
(715/2007)

Registration plate  
space  
(1003/2010)

Access and  
manoeuvrability  
(130/2012)

Statutory plate  
(19/2011)

Towing device  
(1005/2010)

Defrost/demist  
(672/2010)

Wiper/washer  
(1008/2010)

Wheel guards  
(1009/2010)

Heavy duty  
emissions  
(595/2009)

Heavy duty CO2  
(2017/2400)

Spray  
suppression  
(109/2011)

Masses and  
dimensions  
(1230/2012)

Tyre installation  
(458/2011)

Pedestrian  
protection  
(78/2009)

Recyclability  
Directive  
(2005/64)

Air Conditioning  
Gas Directive  
(2006/64)

Hydrogen  
(79/2009)

Gear shift  
indicators  
(65/2012)

Advanced  
emergency  
braking systems  
(347/2012)

Lane departure  
warning systems  
(351/2012)

e-Call  
(2015/758)

General safety  
regulation  
(661/2009)



## Status of UNECE Approvals

UNECE approvals for subjects where equivalence is recognised in 2018/858 as retained will continue to be accepted at face value e.g. R51.03

Intention to expand this list and maximise use of UNECE regulations in future where possible e.g. light duty emissions

Currently investigating potential for accepting equivalent UNECE approvals prior to list being updated – legal process ongoing

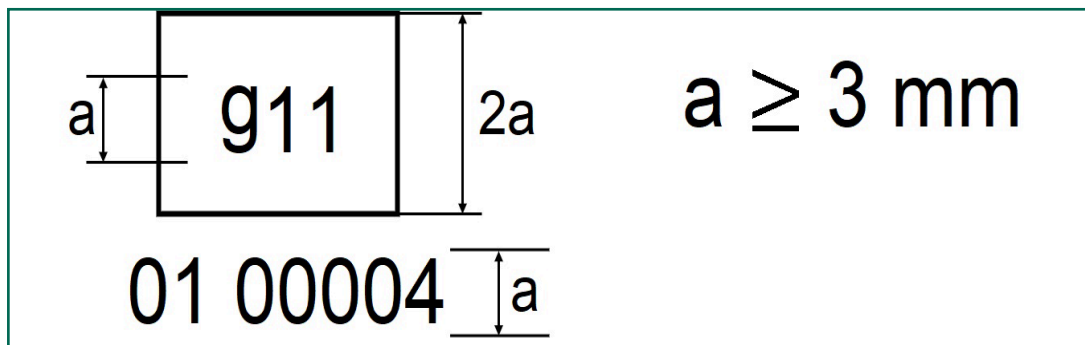




## Marking of GB Approved Components

Components with GB type approval will need be marked according to legislative requirements

Markings are as per retained EU requirements, but will change from an “e??” mark to a “g11” mark



Proposed two year derogation to enable suppliers to adjust production

## Article 39 New Technology Exemptions

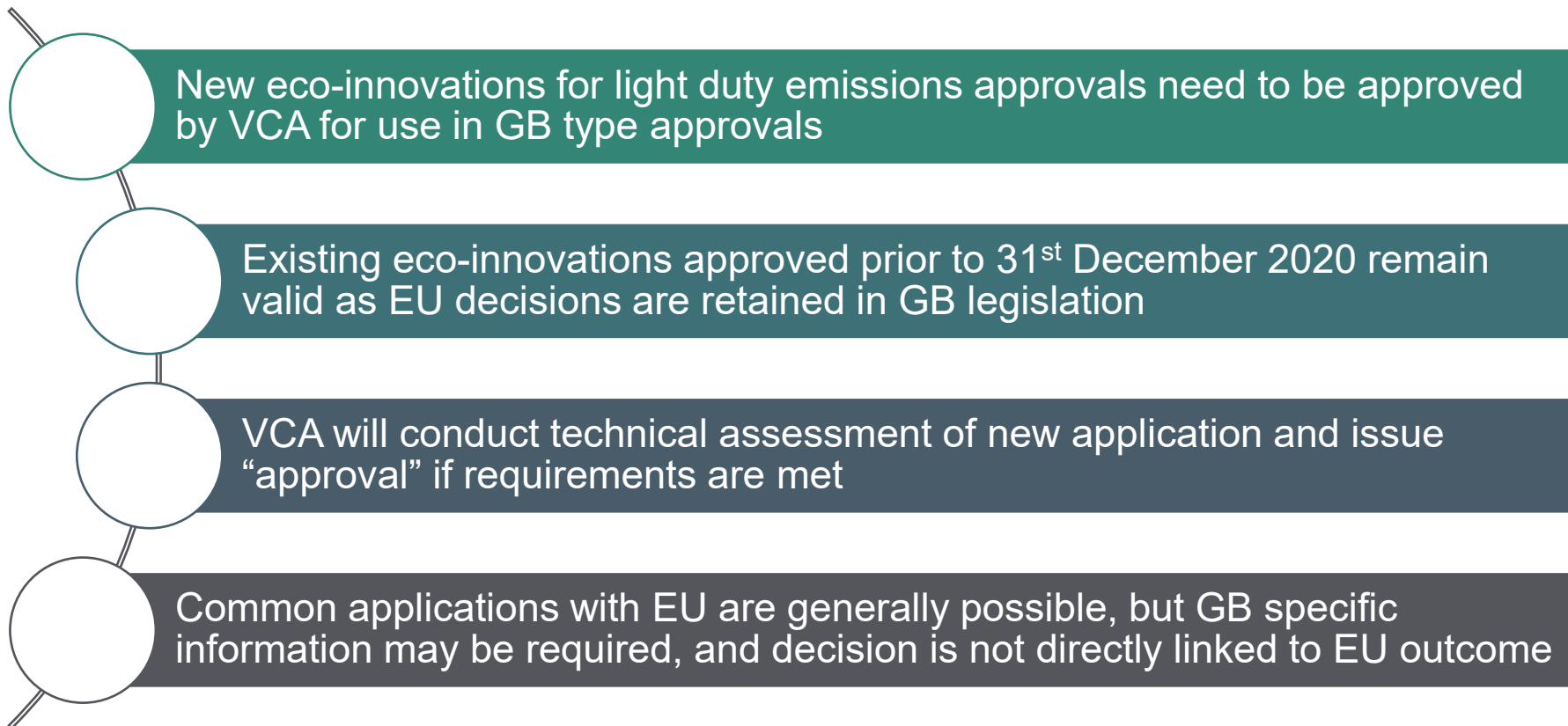
Process retained in GB type approval to enable innovative systems

Applications will be assessed by VCA and then final review will be conducted by board of DfT technical experts

For technologies already approved by the EU, VCA will endeavour to re-use current information and test data where possible but technical review is required to consider any GB specific implications



## Eco-Innovations





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# Subject deep-dive: AES/BES technical review

Peter Housden-Rowe



## AES BES Refresher:

Extended Documentation Package is a requirement for EU emissions approval. EDP includes dedicated AES BES description document:

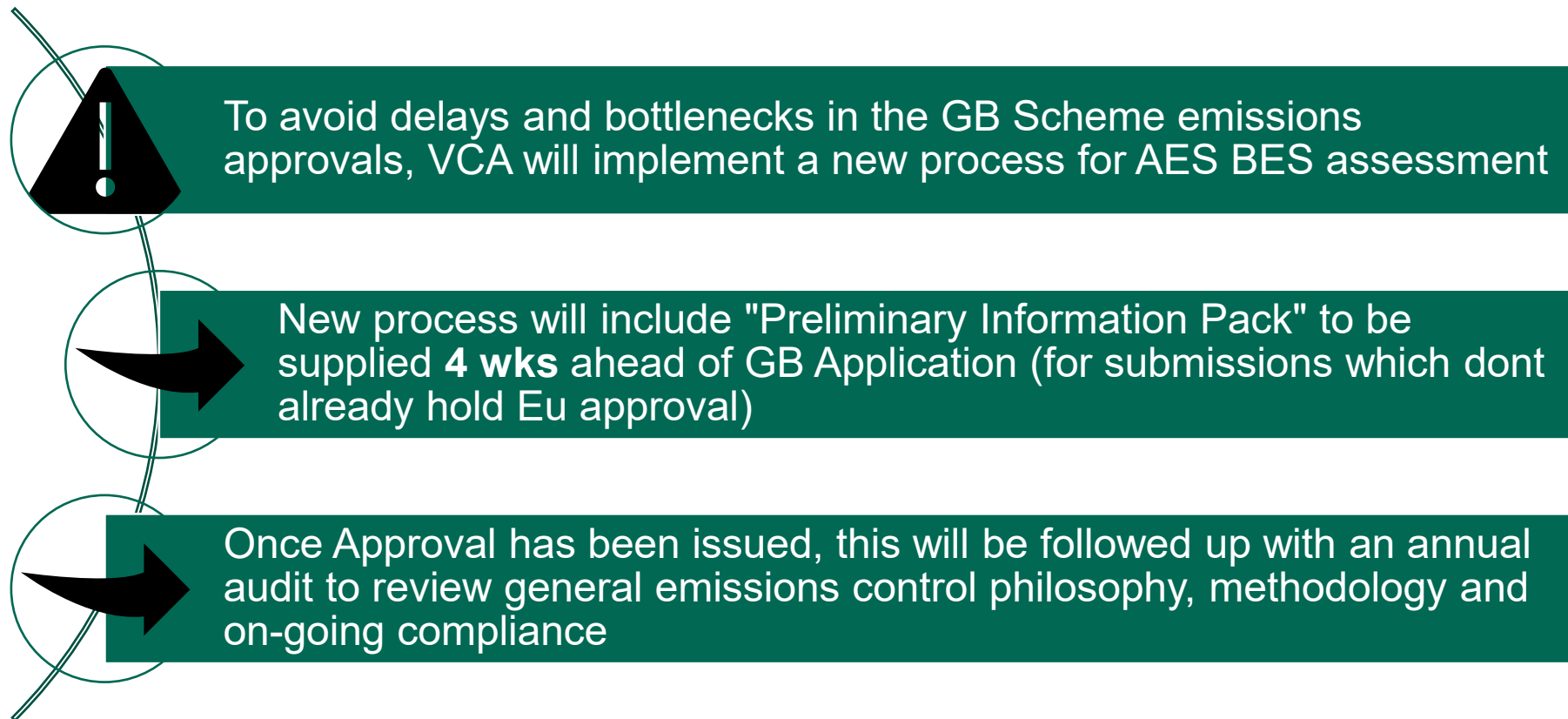
- AES: Auxiliary Emissions Strategy
- BES: Base Emissions Strategy

Regulatory requirements overview for AES BES acceptance by a GTAA as part of an EU emissions approval:

- A description of the engine and the emission control strategies and devices employed
- An evaluation of how the AES will control real-driving emissions to the lowest practical level, including the expected increase of emissions by using the AES, compared to the BES.
- A declaration of the manufacturer that the software does not contain any defeat device
- A declaration of RDE compliance (LD) or off-cycle compliance (HD)



## GB Scheme AES BES Process





## GB Scheme AES BES Process

The Preliminary Information Pack will be a prepopulated document, with entries to cover the following areas applicable to LD applications:

- Defeat Device Declaration
- If applicable, evidence that the EDP has been reviewed and approved by an Eu TAA / TS
- AES impact evidence – emissions status from 2x RDE trips run at:
  - ☐ Low ambient temperature (-7 -> 0DegC)
  - ☐ High Payload (80-90%)



The intention is to re-use existing data from your Design Verification Process to demonstrate robust real-world emissions behaviour, to validate AES BES.



## GB Scheme AES BES Process

The Preliminary Information Pack will be a prepopulated document, with entries to cover the following areas applicable to **HD** applications:

- Defeat Device Declaration
- If applicable, evidence that the EDP has been reviewed and approved by an Eu TAA / TS
- AES impact evidence:
  - ☐ PEMS data with AES('s) active, and/or,
  - ☐ WHTC data with AES('s) active



The intention is to re-use existing data from your Design Verification Process to demonstrate robust real-world emissions behaviour, to validate AES BES.





## GB Scheme AES BES Process

Annual Audit to be scheduled prior to Approval being issued. To be held in person at Manufacturers location, and is anticipated to span two days, covering the following areas:

- Spot check of two full EDP (e.g 1x Gasoline, 1x Diesel)
- Review of general emissions control philosophies (software and hardware)
- Review of emissions validation and robustness processes
- Look-ahead to future programmes and/or mid-cycle updates



The intention is to create a strong working relationship at an engineering level, to ensure ongoing compliance and emissions robustness.



## Summary

- ▶ If the application for the GB Scheme **does not** have an existing EU Approval in place, we need the Preliminary Information Pack to be **submitted 4 weeks ahead** of the GB application (Standard VCA Process).
- ▶ If the application for the GB Scheme **does** have an existing EU Approval in place, the Preliminary Information Pack can be submitted at the same time as the GB application or submitted separately in advance.
- ▶ In all cases, upfront discussion around AES BES content, and sharing of the Preliminary Information Pack, is welcomed and encouraged – this will assist in a smooth transition into the GB Scheme.



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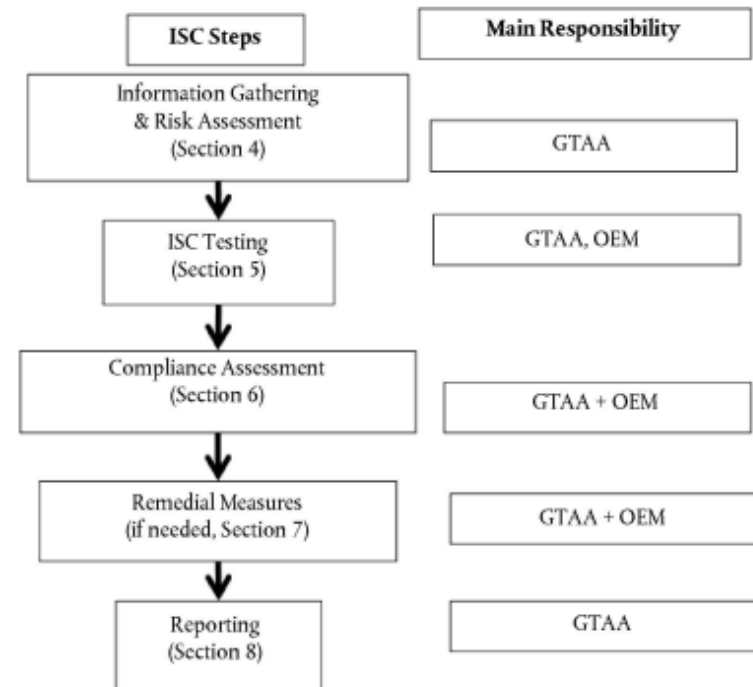
# Subject deep-dive: In-Service Conformity (Light-Duty Emissions)

Oliver Wheatley



## In-Service Conformity – Key Points

- ▶ GB will follow the same ISC procedure as the EU (*Part B of Annex II to retained Regulation (EU) 2017/1151 as amended by 2018/1832*)
- ▶ Some deficiencies of the retained EU legislation will be corrected by the upcoming SI:
  - ▶ Sales threshold (5,000) based on **GB sales only**
  - ▶ No '**Electronic Platform**' will be set up in GB to exchange data
  - ▶ **EU or UK-registered** vehicles may be selected for ISC testing





## In-Service Conformity – GTAA Obligations

### VCA's annual testing obligations

- Required to select and test at least **2 ISC families** for each manufacturer (where available) that exceeds the **5,000 GB sales** threshold

### Anticipate this will lead to a very high annual testing volume from 2024

- To aid planning: Advanced information on predicted number of GB ISC families and how many will have > 5,000 GB sales (**please complete our survey**)

### GB sales and emissions-related warranty data

- Each January, VCA will request this data for the previous year from all manufacturers who have been granted a GB emissions approval.
- Need this information as soon as possible (**Week 6**)

### Funding for ISC

- As with ISC in the EU, costs will be recovered by fees levied on the manufacturer by VCA



## In-Service Conformity – **Manufacturer Obligations**

- ▶ VCA will accept **EU ISC testing to cover GB ISC testing** for where the ISC families and vehicle specifications are technically the same
- ▶ **GB-specific ISC testing** may be required by the manufacturer if:
  - ▶ there are any 'GB-only' families (i.e. no EU-equivalent families); or
  - ▶ there is an ISC family where GB sales is  $> 5,000$  and EU is  $< 5,000$ .
- ▶ For eligible manufacturers wishing to utilise EU ISC testing to cover GB, VCA will request for a **GB-EU correlation list** to understand the EU ISC families vs GB ISC families and the associated **testing plan to cover the GB market** each year
  - ▶ This can be managed as part of regular CoP meetings between VCA and the manufacturer



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# Subject deep-dive: HD CO2 approvals

Peter Housden-Rowe



## Regulation Context



Regulation 2017/2400 covers the determination of CO<sub>2</sub> emissions and fuel consumption for heavy-duty vehicles



Scope covers N3 vehicles and N2 vehicles with TPMLM > 7.5t

Certification of “CO<sub>2</sub> emissions and fuel consumption related properties” of components and STUs

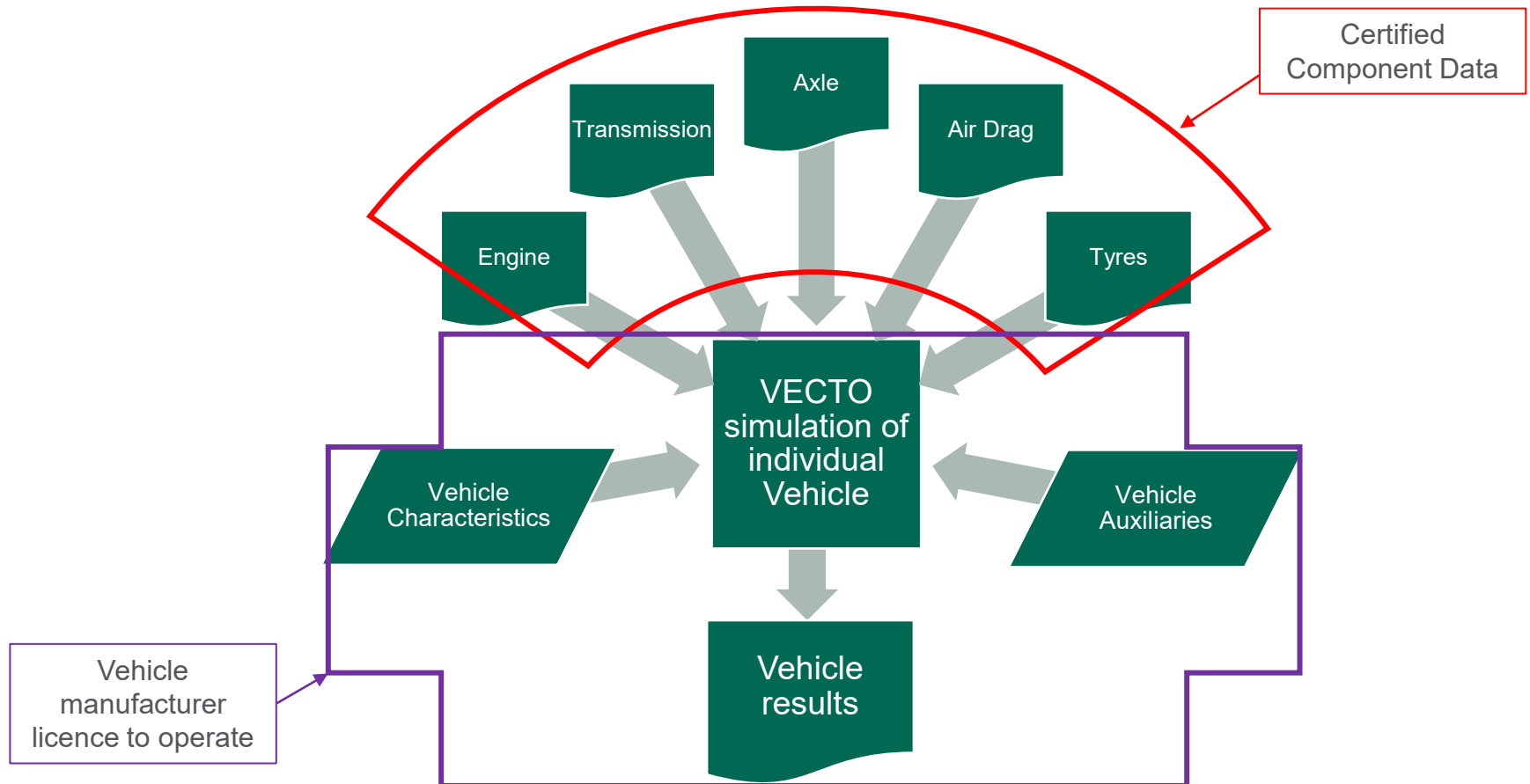
Two  
approval  
elements

“Licence to operate”  
VECTO simulation tool to  
generate individual  
vehicle CO<sub>2</sub> & FC values





# Process Overview





# HD CO<sub>2</sub> In GB Type Approval

## ► Component Approval Policy



Due to nature of VECTO simulation process, duplicating component approvals for GB is not feasible at this time



Continued acceptance of EU component certifications for an interim period



Allows manufacturers to utilise latest EU provisions for alternative fuels

## ► Vehicle Approval Policy



GB approval required for “Licence to Operate” VECTO



VCA will conduct technical review of applications



Manufacturer can use same process for EU/GB, reduce duplication of effort



## “License to Operate” Approval Process

Manufacturer submits application (information document and any additional documentation required to describe their process, test reports if already assessed by a Technical Service)

VCA conducts technical review of the information provided and makes assessment of any items not covered by compliance evidence

If all conditions are satisfied, licence to operate approval is granted

Manufacturer submits relevant CoP information e.g. VTP data and works with VCA to facilitate legislated assessments each year



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# Policy & plans for non-retained legislation

Peter Housden-Rowe



## Non-retained Legislation

As the GB scheme is based on EU law as retained on 31<sup>st</sup> December 2020, later developments in EU type approval are not captured, such as:

- General Safety Regulation (GSR) II (2019/2144)
- Heavy Duty Emissions “Step E” (2019/1939)
- Light Duty Emissions “Euro 6e”

As these requirements are not retained they do not feature in the GB scheme and no additional assessment will be made

Systems based on non-retained legislation can be accepted within the GB scheme, so long as they do not affect compliance with retained GB legislation



## Future Plans – GSRII Case Study

Multiple options on how to handle non-retained legislation in future:

- Adopt in full as per EU requirements
- Partial adoption of items relevant or of interest to GB
- Do not adopt any part of legislation

Decisions will be based on ministerial direction and further developed in consultation with industry

Dependent on further legal powers associated with Transport Bill or other primary legislation depending on nature of change



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# Refreshments Break

See you in 30 minutes!



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# Conformity of Production (CoP)

Sean Morris



# Conformity of Production (CoP)

- ▶ Many of you attended the CoP workshop and webinar series last November
- ▶ This is more of a refresher for those people and a general overview for everyone else
- ▶ Key agenda items:



General Context of CoP



3 Phase Introduction Approach to GB Requirements



Ongoing Business as Usual



Important Detail to Highlight – i.e. Test data



Questions



# General Context of CoP

## ▶ **What is Conformity of Production?**

- ▶ The ability to produce a series of products which conform to the specification and performance requirements of a relevant Regulation.
- ▶ Purpose is to ensure every vehicle/component is going to be the same as the one approved
- ▶ Test One > Make Many

## ▶ **What does that mean in practice?**

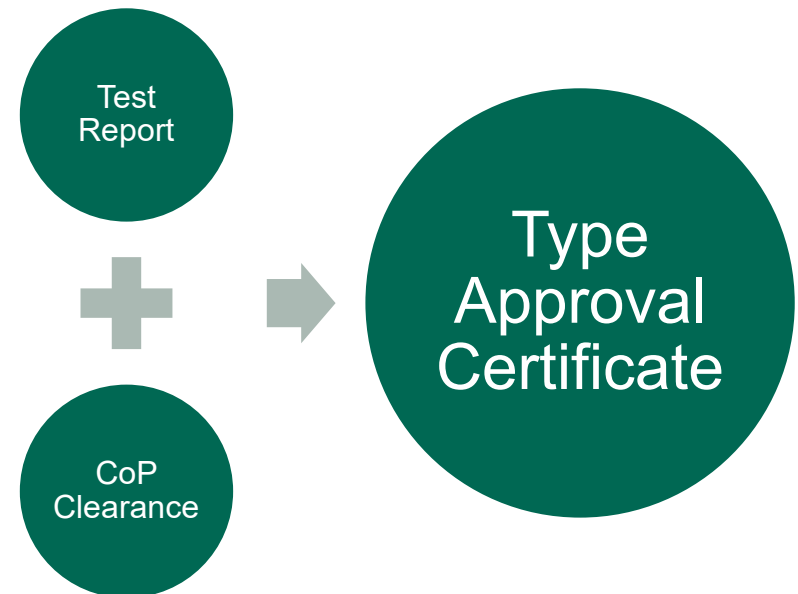
- ▶ Visit assembly plants
  - ▶ Review quality management system (ISO9001 is not required but a good indicator)
  - ▶ Review 'control plans' for each Type Approval subject
- 
- ▶ More information is on our [website](#)



# General Context of CoP

## ► How does it fit into Type Approval?

- Before an approval can be issued (including extensions) the approval holder must have valid CoP clearance for the subject being approved and the assembly plants listed on the information document
- **No CoP = No Approval**
- It is vitally important to make VCA aware of any changes to scope or assembly plants before starting any technical work with us as leaving this to the end will likely cause delays to issuing the approval





## General Context of CoP

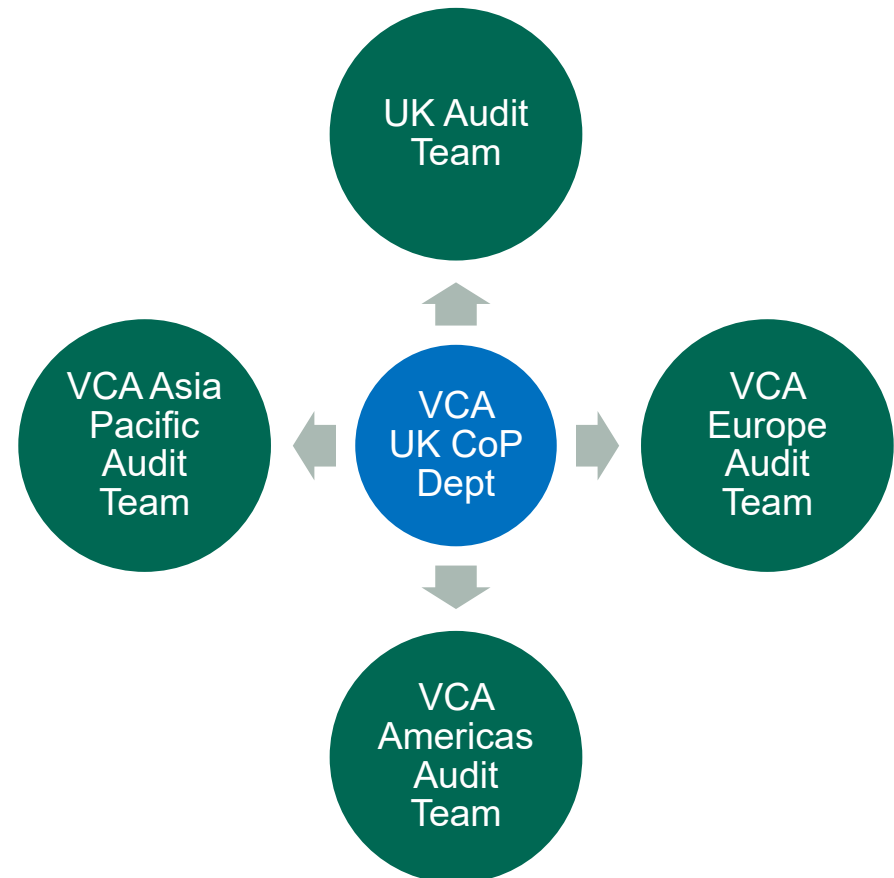
- ▶ **How does this apply to the GB Type Approval Scheme?**
  - ▶ To obtain a GB Type Approval Certificate the same concept applies
  - ▶ The test report will come from a Technical Service
  - ▶ **The CoP clearance must come from VCA**
- ▶ Note a National Small Series (NKS) CoP scope issued by an EU Member State will not cover GB National Requirements



## General Context of CoP

### ► VCA Conformity of Production Structure

- VCA have structured the CoP process to comply with ISO17021 as required in the Whole Vehicle Framework Regulation
- The decision maker for all CoP clearances sits within the UK team as part of the Type Approval Authority (TAA) side of VCA
- The global VCA audit teams then undertake the audits and make a CoP recommendation to the TAA





## 3 Phase Introduction Approach

- ▶ VCA are phasing in the CoP requirements in three stages to prevent an initial peak which could cause delays
  - ▶ Phase 1 – Declaration Letter
  - ▶ Phase 2 – Initial Assessment and Scope Meeting
  - ▶ Phase 3 – Completion of Audit Schedule



- ▶ Dates will be dependent on expiry of Provisional Approval and own timing for full GB

## 3 Phase Introduction Approach





## 3 Phase Introduction Approach

### ▶ Phase 1 – Declaration Letter

- ▶ This does not apply to existing VCA CoP holders
- ▶ Phase 1 is a Declaration that VCA will be notified if there are CoP related issued to GB vehicles if approved through the Provisional Scheme
- ▶ Phase 1 runs alongside the Provisional GB Scheme only
- ▶ We acknowledge that the EU approval from which the Provisional GB Approval is based has CoP in place already with an EU Member State
- ▶ The gap is that EU CoP does not necessarily cover vehicles being placed on GB market





## 3 Phase Introduction Approach

- ▶ **Phase 1 – Declaration Letter**
- ▶ VCA can provide a template for the declaration
- ▶ Manufacturers own format is acceptable as long as equivalent content
- ▶ Approval holder in the letter is considered the named approval holder in the Provisional "p" Approval
- ▶ Detail needed on how GB vehicles are being managed for CoP
- ▶ Needs to be returned to UK VCA CoP department

### DECLARATION TEMPLATE

[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 our EU Conformity of Production activities, or through an additional process.

[PROVIDE DETAIL]

Any concerns raised through CoP, In-Service Conformity or Market Surveillance activities will be highlighted to the appropriate EU Type Approval Authority or Technical Service, with any issues relating to vehicles registered or offered for sale in the GB Market communicated to VCA at the earliest opportunity.

Best regards,

[SIGNATURE]

[NAME OF RESPONSIBLE PERSON]

[JOB TITLE]

On behalf of [APPROVAL HOLDER]

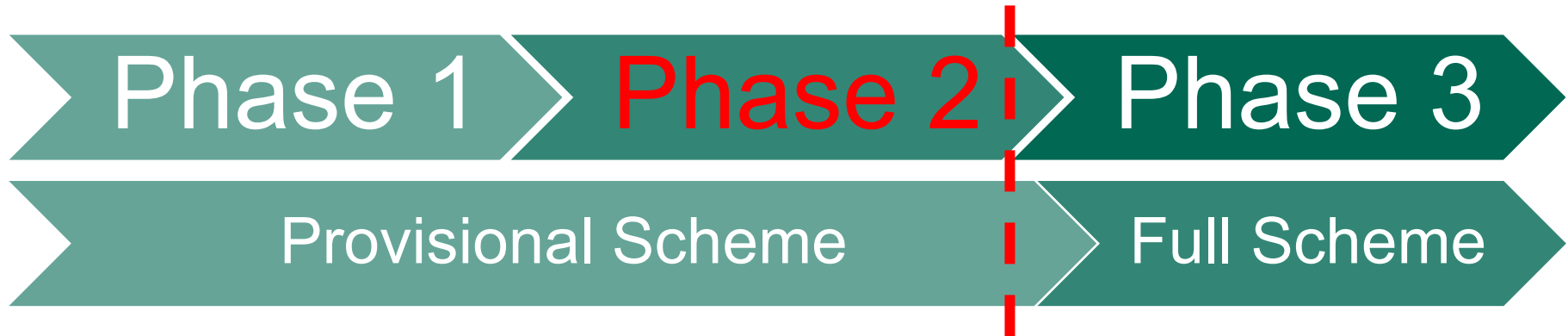


## 3 Phase Introduction Approach

### ▶ Phase 1 – Declaration Letter

- ▶ Phase 1 declaration letters are being held on file
- ▶ If you do not receive a response do not worry
- ▶ This does not support an application to a full GB type approval, this is covered by Phase 2...

## 3 Phase Introduction Approach





## 3 Phase Introduction Approach

### ▶ Phase 2 – Initial Assessment and Scope Meeting

- ▶ Phase 2 must be complete before an approval to the full GB Scheme can be issued
- ▶ 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 (i.e. manufacturer = only assembly plant) this may be a quick exercise



## 3 Phase Introduction Approach

### ▶ Phase 2 – Initial Assessment and Scope Meeting

#### ▶ What is in a Scope Meeting?

- ▶ Allows us to understand how your GB approvals will be managed
- ▶ Who will be the approval holder? Maybe same as EU or a GB entity
- ▶ Who is the manufacturers representative and what is their role?
- ▶ Which assembly plants need to be covered by the future GB approvals?
- ▶ How will the manufacturer demonstrate responsibility for CoP?
  - Very high-level overview of change control and control plans etc
- ▶ How are CoC's being generated and managed?
- ▶ If you are an importer, how will that work?
  - What parts fitted in GB and where? What level of complexity?



## 3 Phase Introduction Approach

### ▶ Phase 2 – Initial Assessment and Scope Meeting

- ▶ This information will then support us in making an audit schedule
  - ▶ Onsite audits at each assembly plants over a 3-year period
  - ▶ Remote audits when not onsite that year for each plant
  - ▶ For vehicle manufacturers, an annual review meeting with the approval holder to cover non-assembly plant items such as test data, Certificates of Conformity checks etc
  - ▶ For manufacturers with emissions approvals, quarterly meetings will be schedule to stay connected and monitor emissions data and request **ISC** (in-service conformity) information



## 3 Phase Introduction Approach

### ▶ Phase 2 – Initial Assessment and Scope Meeting

- ▶ Phase 2 is purely a planning exercise, and no audits are needed before initial clearance granted
- ▶ Phase 2 must be in place before an approval can be issued
- ▶ Can be completed in advance of needing the approval
- ▶ Audit schedule can be planned to commence at a future date so time is not lost
- ▶ Note that even if you are a VCA CoP holder, the approval holder needs to take responsibility for initiating the Phase 2 discussion rather than waiting for the renewal of the existing clearance in case that does not align with their GB approval timing



## 3 Phase Introduction Approach

- ▶ **Phase 2 – Initial Assessment and Scope Meeting**
- ▶ The output from the Phase 2 meeting will be:
  - ▶ A certificate 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



## 3 Phase Introduction Approach





## 3 Phase Introduction Approach

### ▶ Phase 3 – Completion of Audit Schedule

- ▶ Will follow on from the Phase 2 assessment either immediately or at the scheduled start date
- ▶ Will be the application of the Phase 2 plan
- ▶ Consists of:
  - ▶ Quarterly meeting (vehicle manufacturers with emissions approvals)
  - ▶ Annual review (vehicle manufacturers)
  - ▶ On-site audits of assembly plants
  - ▶ Remote audits of assembly plants
- ▶ Delivers quality CoP clearance through clear communication lines and regular audits



## 3 Phase Introduction Approach

### ► Phase 3 – Completion of Audit Schedule

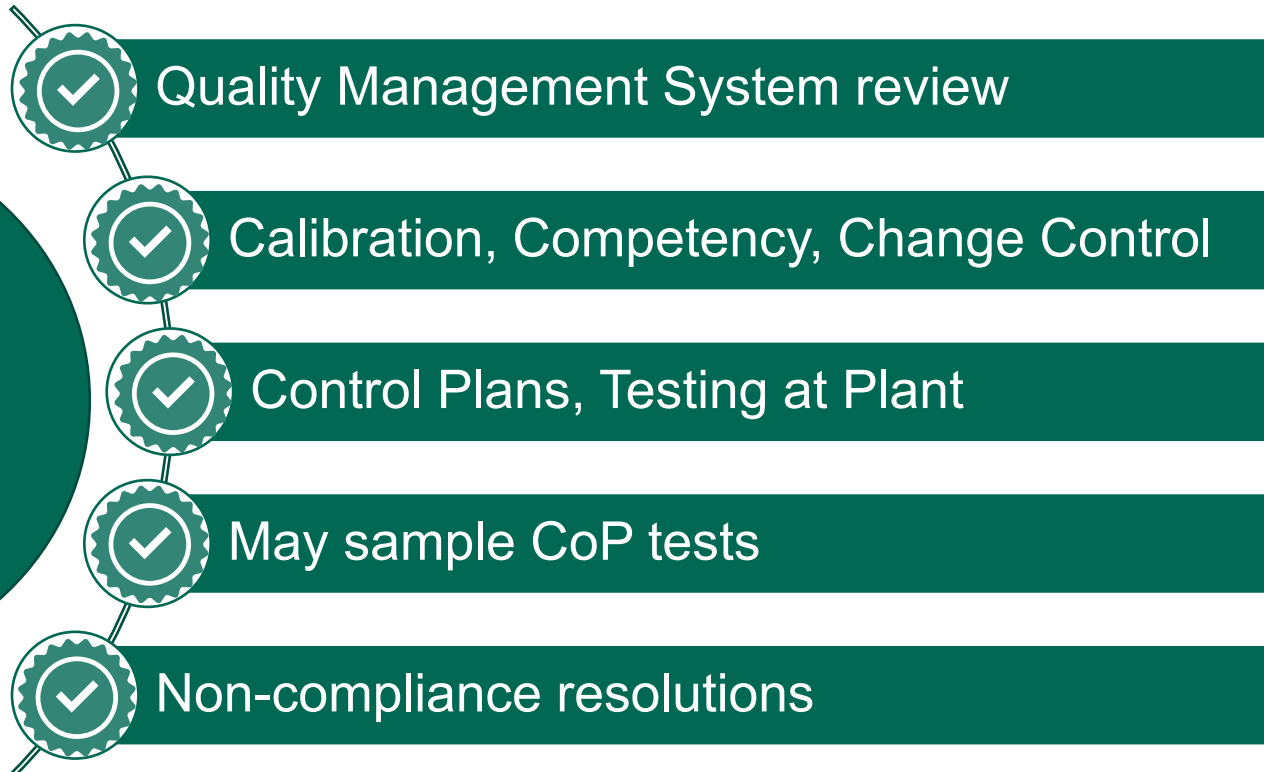
Communication  
through  
Quarterly  
Meetings and  
Annual Review

- ✓ Approval holder or Manufacturer Representative
- ✓ Understand changes before they happen
- ✓ Reduce last minute problems
- ✓ Emissions test data and compliance review
- ✓ Review of CoP test schedules and sampling
- ✓ Recalls / Non-compliance resolutions

## 3 Phase Introduction Approach

### ► Phase 3 – Completion of Audit Schedule

Validation and  
Compliance  
through Audits



## 3 Phase Introduction Approach

### ► Phase 3 – Completion of Audit Schedule

	Onsite Audit	Remote Audit
<b>Frequency</b>	1 in 3-Year Period	Non-Onsite Years (2 in 3)
<b>Length</b>	1 or 2 days	4 hours
<b>Risk Rated</b>	Yes	Yes
<b>Method</b>	In-Person Visit	Video Call
<b>Evidence Submission</b>	During Visit	Advance of Audit
<b>Costs</b>	£1295 for 1 day £1785 for 2 days Plus Travel Costs	£890



## 3 Phase Introduction Approach

- ▶ **Phase 3 – Completion of Audit Schedule**
- ▶ The output of Phase 3 will be:
  - ▶ 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



## Ongoing Business as Usual

- ▶ **When happens after Phase 3 is complete?**
- ▶ A new audit schedule will be created in the same approach as Phase 3
- ▶ Future clearance will be based around a 3-year cycle, dependant on risk level
  
- ▶ **How will we contact you?**
- ▶ VCA will contact you in advance of clearance expiry or scheduled audit to make arrangements 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
- ▶ **No CoP = Cannot sell vehicles in GB – Vital that contact details are kept up to date**



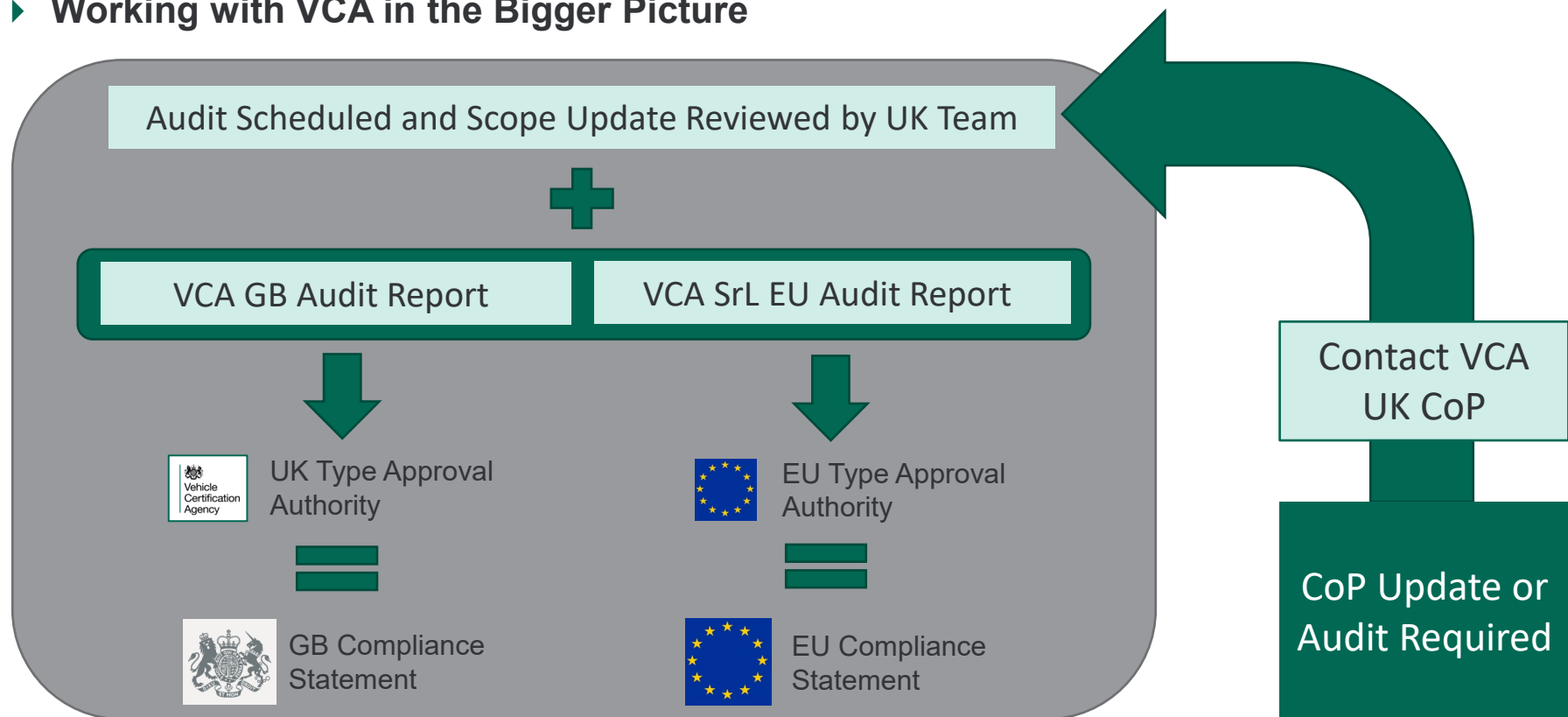
# Ongoing Business as Usual

- ▶ **How to keep us up to date?**
- ▶ Use the established communication lines to keep us up to date of any changes to your current or future scope
  - ▶ **Name**
  - ▶ **Address**
  - ▶ **Subject list / Scope**
  - ▶ **Plants**
- ▶ **Please help us to ensure we can meet your deadlines**



# Ongoing Business as Usual

## ► Working with VCA in the Bigger Picture





## Important Detail to Highlight

- ▶ **2018/858 is the retained GB standard and so CoP will be following these requirements**
- ▶ The differences are mainly contained in the articles which can be overlooked
- ▶ To be assessed at initial clearance and on an ongoing basis:
  - ▶ Manufacturer's representative and mandate per Article 13 Paragraph 4 and Article 15
  - ▶ Manufacturers and importers marking per Article 13 Paragraph 8 and Article 16 Paragraph 5
  - ▶ Complaints Procedure per Article 13 Paragraph 7 should detail how managing complaints related to risk and incidents of non-compliance
  - ▶ Approvals withdrawal procedure per Article 35 Paragraph 4 and 5
  - ▶ Procedure for identifying economic operators per Article 21



## Important Detail to Highlight

- ▶ To be monitored through Annual Reviews:
  - ▶ CoC checks are needed per Article 31 Paragraph 2 and we will cover this through the annual review with the approval holder
  - ▶ Repair and Maintenance Information (RMI) and On-Board Diagnostics (OBD) checks are needed per Article 31 Paragraph 6, again being covered through annual review
  
- ▶ Subtle changes in the CoP Annex IV:
  - ▶ Maximum clearance 3 years in line with E/ECE/TRANS/505
  - ▶ Change in wording for acceptance of ISO certification



## Important Detail to Highlight

- ▶ **What CoP testing is required?**
- ▶ The approved control plan will agree the CoP test schedule. Some subjects such as emissions are clear in the legislation around frequency of testing.
- ▶ **Do we have to duplicate CoP testing for GB?**
- ▶ No. Where tests are being undertaken for EU CoP and the vehicle specification is identical to the GB Type and the test specification is identical to GB legislation then no repeat testing is necessary. We will accept the same data set but will require access to the data direct from the manufacturer (i.e. not via an EU TAA or TS).
- ▶ **Does the CoP testing have to take place in the UK?**
- ▶ No. Any suitable test facility is acceptable. For example, a lab with ISO17025 accreditation with the correct scope, or a lab approved to complete Type I testing



## Important Detail to Highlight

### ▶ **How to Apply?**

- ▶ 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 Phase 2, 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 Principal Compliance Engineer to co-ordinate their work



## Important Detail to Highlight

- ▶ **Where can I find more information?**
- ▶ Our website is a great resource for CoP information:
- ▶ <https://www.vehicle-certification-agency.gov.uk/conformity-of-production/>
- ▶ The FAQ page is a collation of the questions we received in the November webinars
- ▶ For other questions please contact: [copmailbox@vca.gov.uk](mailto:copmailbox@vca.gov.uk)



## Key Takeaways

- ▶ There will be 3 phases to the introduction of the CoP requirements
- ▶ The exact timing for the 3 Phases will depend on each manufacturers own timing of models and when their Provisional Approvals will expire
- ▶ Phase 1 is for the Provisional Scheme only and only applies to manufacturers without VCA CoP Clearance
- ▶ Phase 2 is a scheduling step in preparation for the Full GB Approval and must be completed in advance of needing this – No onsite plant audit needed
- ▶ Phase 3 is the completion of the schedule after the GB Approval has been issued
- ▶ BAU will continue in the same style with 3-year schedules
- ▶ VCA Audits can cover GB, UN and EU scope in a single audit if included in plan
- ▶ Good communication and up to date CoP = Less problems gaining approvals



# Closing Remarks

Chris McCabe and Anna Lindt





## Further Information

Vehicle Certification Agency

Search this site

Type Approval | Conformity of Production (CoP) | Other Certification | Dangerous Goods | Vehicle Importing | Legislation

[Home](#) > [Vehicle Type Approval](#) > National Type Approval in the UK

### National Type Approval in the UK

*This page was last updated on 10th September 2021*

Contents

- [National Type Approval in the UK Overview](#)
- [UK\(NI\) Scheme](#)
- [GB Scheme](#)
- [Provisional GB Scheme](#)
- [Timeline](#)
- [Retained e11 Approval Status](#)

Publications

Information on GB & UK(NI) type approval will be added to the [VCA website](#) as it becomes available

Hosting a range of comms events:

👉 [In-person seminar at National Motorcycle Museum on 21<sup>st</sup> June](#)

👉 Webinars on 27<sup>th</sup>, 29<sup>th</sup>, 30<sup>th</sup> June

👉 Further events covering other vehicle categories in due course



## Further Information

### ▶ **Mailing List**

- ▶ VCA are using MailChimp to create a mailing platform to allow us to communicate directly with industry on key topics
- ▶ Interest topics can be selected based on area of work:
  - ▶ Regulations
  - ▶ Conformity of Production
  - ▶ Test Facilities
  - ▶ Events
  - ▶ Careers
  - ▶ Etc...



Vehicle  
Certification  
Agency

# Feedback Survey

► [Link to Feedback Survey](#)

