



VEHICLE SAFETY STANDARDS (VSS)

CONFORMITY OF PRODUCTION (COP) AUDIT REPORT

TC / TD Trailers

Report Number: P7119/2013

Date of Issue: 22/1/2013

Manufacturer: Liberty Campers Pty Ltd

Location of Plant: 21 Hales Drive
South Australia 5160

Dates of visit: 22/1/2013

VSS auditors: s.22(1)(a)(ii) VSS, Team Leader
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s.22(1)(a)(ii) VSS, Auditor
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VSS audit contact: *audit@infrastructure.gov.au*
Company to list Production Facility Id and Company Name in the email subject title when responding to the findings of the audit.

Company contact for COP: s.47F(1)
Director
libertyfreightmore@yahoo.com

Company personnel: See attached attendance list.

Purpose of visit: Routine Conformity of Production (COP) audit on the Company based on Australian Design Rules (ADRs) applicable to TD heavy trailers.

Company details:

The Liberty Campers Pty Ltd manufactures trailers for the Australian market at its Lonsdale plant in South Australia. The main models built are the Liberty Freighters ST3.

There are 12 employees currently producing over 100 trailers a year.

Liberty Trailers has not implemented and maintained its own Quality System Documentation (QSD): The company has not achieved certification of the quality system.

Visit Summary:

Attachment 1 reports on the items audited and the procedures in operation. Several concerns were raised during the audit and these were discussed with the responsible personnel when found and also presented at the closing meeting.

Conclusion:

On the basis of the observations during the audit, the auditors were not satisfied that the quality assurance system in place provided adequate assurance that the trailers produced at this plant comply with the ADRs.

Corrective Action:

The Company is requested to examine the concerns and await advice from the Administrator of Vehicle Standards on the action required in response to the Non Conformance (NC) concerns raised at this audit. However the Company can begin to address all the Corrective Action Requests (CARs) raised and advise within 6 working weeks of the date of this report, the corrective action taken or proposed to be taken on the CARs and action to prevent similar recurrences.

Name : s.22(1)(a)(ii)
Position : Lead Auditor
Date : 22/1/2013
s.22(1)(a)(ii)
Signed :

Name : s.22(1)(a)(ii)
Position : Auditor
Date : 22/1/2013
s.22(1)(a)(ii)
Signed :

I have received a copy of this report and understand its contents.

Name : s.47F(1)

Position : Director

Date : 22/1/2013

Signed : s.47F(1)

Attachment 1

ITEM	CODE	EFFECTIVENESS OF PROCEDURES (Include reference of documents examined where appropriate)
1. Are records kept of all trailers supplied to the market eg a VIN or Job number register?	OI	Yes. VIN register does not have a list of SARNs. Recommend VIN register has a reference to the SARN against every VIN.
2. Does the company hold all the approval certificates?	S	Yes. Only a copy held on premises. Sighted documentation for Approval 41366. Originals are not held on site for security reasons. Recommend original approval document be held at manufacturing premises.
3. Are field complaints reviewed and corrective action taken?	OI	Yes. Company has a procedure for handling customer complaints but it is not documented. There is also not a process for managing in service issues with trailers supplied to the market. Recommend company implement a procedure for handling customer complaints and reviewing any issues with the fleet.
4. Are customers' orders documented?	S	Yes, every client is assigned a file. The files also have all the SARNs listed. Job number: 10294.
5. Is there a documented system to ensure that production trailer specifications are covered by a valid compliance plate approval?	OI	Yes, there is a sign off sheet with SARN's and specifications of the trailer. The workshop does not have work instructions for completing each order. Recommend company implement job cards/work instructions for the manufacture and completion of all trailers.
6. Are CPA applications being submitted for fitment of new combinations of brake sub assemblies eg a list of approved combinations of brake sub assemblies?	S	Yes, update of the approval is held by the company. Inspectors sighted amended approval from 17 January 2013.
7. Do the purchase documents for brake subassemblies have approval numbers?	OI	No. Inspectors sighted an invoice form Colrain for job number 34409 from the 16/1/13. Recommend company ensures suppliers add SARN to all purchase orders and invoices. Also please add the job number for purchase orders.
8. Are documented work instructions including drawings available for the fitting of ADR related items: eg. 8.1. installing suspensions, axles, brake boosters & control system?	AC	Yes. Inspectors sighted Colrain drawing for SARN 16518. The company has an array of non-stock items held on site with no quarantine area. Parts associated

		<p>with SARNs are not marked with the approval number.</p> <p>Recommend that company segregate non-compliant parts from compliant parts. Also parts to be fitted to a trailer which are covered by a SARN need to be marked to ensure they are fitted to the correct trailer.</p>
<p>8.2. setting the slack adjuster length for each axle?</p>	<p>AC</p>	<p>No, company assures an after assembly check is performed but there is no documented procedure for advising the fitter of the correct length.</p> <p>Recommend company implement a procedure for guiding the fitter for the correct slack adjuster length.</p>
<p>8.3. installing lamps on the trailer?</p>	<p>AC</p>	<p>No, there is no documented procedure for the installation of the lighting.</p> <p>Recommend company implement a procedure for the fitment of the lights to the trailers. Lighting layout drawing is inadequate as it does not include fitment measurements. The company should check the fitment of all light systems as it was noted at Audit that there may be some potential non-compliance with ADR13/00.</p>
<p>8.4. stamping the compliance plate?</p>	<p>NC</p>	<p>The company orders the plate from Niddrie nameplates and stamps them in house. No records are kept of the orders.</p> <p>Recommend company keeps records of the plate orders. Approval 41136, Schedule 5 indicates that the plates are to be sourced from Niddrie Nameplates.</p>

torque wrench?		
18. Is the equipment capable of measuring the specified measurement?	S	Yes
19. Do the calibration records show that all the equipment has been calibrated at the prescribed intervals?	OI	Yes. Recommend the company set up a calibration record.

Audit Finding Codes :

NC	Non Conformance	Non Compliance with Australian Design Rules (ADRs) Administrators Circulars or Certification Arrangements
AC	Areas of Concern	Potential for Non Conformance
OI	Opportunity for Improvements	Suggestions / Recommendation
S	Satisfactory	
N	Not Applicable	

CORRECTIVE ACTION REQUESTS

CAR No.	CODE	DETAILS OF AUDIT FINDINGS
1	OI	Recommend VIN register has a reference to the SARN against every VIN.
3	OI	Recommend company implement a procedure for handling customer complaints and reviewing any issues with the fleet.
5	OI	Recommend company implement job cards/work instructions for the manufacture and completion of all trailers.
7	OI	Recommend company ensures suppliers add SARN to all purchase orders and invoices. Also please add the job number for purchase orders.
8.1	AC	Recommend that company segregate non-compliant parts from compliant parts. Also parts to be fitted to a trailer which are covered by a SARN need to be marked to ensure they are fitted to the correct trailer.
8.2	AC	Recommend company implement a procedure for guiding the fitter for the correct slack adjuster length.
8.3	AC	Recommend company implement a procedure for the fitment of the lights to the trailers. Lighting layout drawing is inadequate as it does not include fitment measurements. The company should check the fitment of all light systems as it was noted at Audit that there may be some potential non-compliance with ADR13/00.
8.4	NC	Recommend company keeps records of the plate orders. Approval 41136, schedule 5 indicates that the plates are to be sourced from niddrie nameplates.
14	OI	Recommend the company implement a procedure for ensuring all critical bolts are tightened to specification.
15a	AC	Recommend a check be added to the checklist for the confirmation of the VIN. There is an inconsistency with the company name, company to investigate and advise VSS of the correct name and the name they wish to use on the plate. VSS to advise one this occurs.
16	OI	Recommend company add a brake system leak check to the final checklist.
19	OI	Recommend the company set up a calibration record.