Issued by the
Administrator of Vehicle Standards
in consultation with the
Australian Motor Vehicle Certification Board
comprising Commonwealth, State and Territory representatives

Australian Government
Department of Infrastructure and Regional Development

CIRCULAR 0-13-1

CONFORMITY OF PRODUCTION

Introduction

1. Conformity of Production (COP) audits are intended to assure the Administrator of Vehicle Standards (the Administrator) that Licensees holding Identification Plate Approval (IPA) only supply vehicles to the Australian market that comply with the applicable Australian Design Rules (ADRs) and conform with the approved design. In addition, COP audits conducted on manufacturers and importers of trailers with Aggregate Trailer Masses (ATMs) of 4.5 tonnes or less are intended to assure the Administrator that such trailers supplied to the Australian market comply with the applicable ADRs.
2. IPA holders generally demonstrate compliance with the ADRs by testing pre-production or early production samples of a vehicle model or its components. However, the design typically evolves throughout the life of the vehicle model. To be assured that all production vehicles comply, the following three types of audit are conducted:
   i. **Test Facility Inspection**: to confirm that the design level of the components or systems tested to the ADRs is known, and confirm the validity of the test procedures and results of the tests.
   ii. **Design Facility Audit**: to confirm the design of the components or systems relevant to the ADRs and the internal review of their design.
   iii. **Production Facility Audit**: to confirm the design level of components or systems relevant to the ADRs used on the production line, as well as the general control over the production processes, so that only vehicles built to the approved design are fitted with Identification Plates.

Quality System Documentation

3. Each Licensee holding an IPA is required to maintain Quality System Documentation (QSD). This may take the form of a quality assurance manual, a quality plan or other relevant documents. The documentation must enable the Administrator to determine the adequacy of the quality assurance system. This is to ensure that Identification Plates are only fitted to vehicles that comply with the applicable ADRs and conform with the approved design. This includes the control of design changes.
4. The Administrator does not seek to impose any particular quality assurance system on a Licensee, but the system adopted must be properly implemented and effective. However, the COP audits are based on the ISO 9000; Quality Management Systems.

COP Audit Planning

5. Consistent with section 9 of the *Motor Vehicle Standards Act 1989*, any Licensee holding an IPA may be subject to an audit. A risk rating is allocated to each production plant that is based on sales volumes, previous audit performance, safety related recall incidents and any other intelligence. The rating is reviewed at least once each year. The frequency of audits may vary

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between one and five years, depending on the rating of the plant. A Licensee will generally not be scheduled for more than one COP audit in a calendar year for each ADR vehicle category.

6. The information gathered from a Test Facility Inspection is referenced during the Design Facility Audit and is then confirmed at the Production Facility Audit. Where a test facility or design facility has not been visited, the information will be requested from the Licensee beforehand to refer to during the Production Facility Audit.
7. A COP audit of a major production facility is generally completed by a team of two officers in two to three working days, depending on the size of the facility. Smaller facilities (such as many trailer manufacturers) are normally audited in a single day.
8. Overseas government authorities, acting as agents of the Administrator, may be used to perform audits in countries such as Japan, Italy, France, Sweden, the United Kingdom or Germany.

COP Audit Notification

9. Notifications for Test Facility Inspections are sent to the test facility and Licensee. The Licensee should then notify the test facility, which may be in-house or an outsourced test facility.
10. Notifications will be provided a minimum of six weeks before the proposed date of the audit and will contain details of the vehicle make, model and the ADRs to be audited.
11. Where a notification has been given for a Production Facility Audit, the Licensee is required to submit a completed Variant Evidence Matrix (refer Attachment 1) for the selected vehicle model and ADRs within two weeks of receiving the notification.
12. Test Facility Inspections are generally based on a maximum of two ADRs. However, if any matters of a certification and/or safety related nature arise during the audit, these may also be included in the final assessment of the TFI. This is required to ensure that evidence of compliance has been submitted for all of the variants capable of being supplied to the Australian market, and that the supplied variants are listed on the approved Road Vehicle Descriptor (RVD). The Variant Evidence Matrix is designed to show all the variants capable of being supplied to Australia and for each variant the features critical to the ADR being used for the audit. For each variant/feature combination the matrix shows the Summary of Evidence (SE) document reference for the relevant approved evidence.
13. Production Facility Audits and Design Facility Audits are generally based on one vehicle model and a maximum of three ADRs for passenger cars, trucks and four-wheel drive vehicles. For motorcycles and buses, these are generally based on one vehicle model and all applicable ADRs.

Facility Assessment

<u>Test Facility Inspection</u>

14. The auditors confirm that the design level of the components or systems tested is known and that this agrees with certification information provided in previously submitted Summary of Evidence (SE) form(s). They also confirm that the test personnel have appropriate levels of knowledge, skill and training, the test equipment is suitable for the test and accurate test records are kept. The requirements are further detailed in the 0-12 series of Administrator's Circulars.

<u>Design Facility Audit</u>

15. The auditors confirm that:

i. The tested design conforms with the engineering drawings;

ii. The design has been controlled so that any changes made since testing continue to comply with the ADRs and (if applicable) have been included in the approved design; and

iii. All variants in production for the Australian market are covered by the approved design (Note: This may be carried out at the production facility where appropriate).

The principal areas to be covered will be Engineering and Certification and at least include (where applicable):

a) Criteria for the selection of test vehicles and components with respect to relevant Administrator's Circular guidelines;

b) Engineering Change Notification (ECN) history for components from the test date to the present;

c) Document control procedures, especially revisions.

Production Facility Audit

16. The auditors confirm that:

i. Components used in production are at the correct design level;

ii. The correct components are used for each variant/option and only vehicles built to approved designs are supplied to the Australian market.

This involves detailed examination of procedures and records to confirm that quality procedures are being followed throughout all manufacturing processes. The principal areas to be covered will at least include (where applicable):

a) Quality Management – organisation chart and position responsibilities, management review, external quality audit reports;

b) Internal Audits – audit schedule plan, audit reports and satisfactory closure of corrective action requests;

c) Field Service Feedback and Recall – ADR related feedback from vehicles supplied, issues resolution, service records;

d) Purchasing – purchase orders confirming design level ordered;

e) Supplier Quality Control – supplier rating records for critical ADR parts, supplier audit records and countermeasure reports, control of design to/from suppliers;

f) Production planning and control – broadcast sheets, check of vehicles able to be supplied to Australia, production schedule, Bill of Materials;

g) Manufacturing Engineering – welding parameters, torque control specifications;

h) Production Shop Floor – torque check and tool identification recorded for ADR-critical joints, welding parameters, control of non-conforming product, parts identification against broadcast sheet, body shop for passenger cars;

i) Final Inspection – stage inspection records, on line storage and identification, control procedures, 3D body dimension check, final inspection records for vehicles built, testing area check, identification plate location, ADR parts checklist;

j) Material Stores – goods receiving, reject stores, segregation of reject material, store location check for ADR parts, inspection parts flagging; and

k) Tool and Gauge Calibration – calibration records for tools identified on shop floor, traceability of calibration records.

If the facility is certified to ISO 9000; Quality Management Systems or equivalent Australian Standards, Quality Management and Internal Audit areas of the company may not be audited.

Where appropriate, some of these items may be checked at a design facility audit.

Conduct of the COP Audit and Audit Reporting

17. During the opening meeting, the lead auditor will introduce the audit team and briefly confirm the purpose of the audit, explain its basis and the ADRs to be audited, as well as finalise the schedule.

18. Formal presentations by facility personnel must be kept to a minimum, with the audit taking place in an area agreed by both auditors and facility personnel. Any findings will be discussed with the facility personnel at the time they are noted.

19. At the end of each day the auditors will hold a brief summary meeting with the facility's nominated representative, to report on any Corrective Action Requests (CARs) that have been raised during the day.

20. A written report is presented at the closing meeting. It details the areas audited, procedures and records examined in each area and a list of any CARs that have been raised. Understanding of the report's content is acknowledged by the facility representative countersigning the report. Any disputed issues will be noted as such in the report.

21. The written report will provide the Administrator with an assessment of whether the audit was generally satisfactory or unsatisfactory. This depends on the number and significance of any CARs, which are categorised as follows:

NC: Non conformance – non compliance with the conditions of the IPA ; for example non compliance with applicable ADRs, Administrators circulars or certification arrangements.

AC: Areas of concern – potential for non conformances.

OI: Opportunity for improvement/suggestions/recommendations.

22. The assessment will be generally satisfactory if there are no NCs. The facility is required to address any CARs (AC and OI) within six weeks. A robust action plan must be formulated within this period to address the CARs. The facility must submit objective evidence of the corrective action taken for satisfactory CAR closure. In addressing the CARs, the facility should look beyond correction of the immediate issue to any broader issue which allowed it to arise in the first place or may permit it to occur again.

23. The assessment will be unsatisfactory if there are one or more NCs. The Administrator will consider the circumstances and decide on an appropriate course of action. This action may be to vary the IPA by imposing additional conditions (e.g. third party inspection) or to suspend or cancel

the IPA. Depending on the significance of the issues raised, the intention is usually to allow the facility time to take corrective actions and continue operating while the corrective actions addressing all CARs (NC, AC and OI) are put into place.

24. Upon receipt of satisfactory evidence addressing all the CARs, the audit will be closed and the Licensee and/or facility advised within six weeks.

Other COP Measures, Conformance Testing

25. Any COP assessment involving lighting ADRs will allow for the use of United Nations Economic Commission for Europe (UNECE) COP sampling criteria where conformity is demonstrated by photometric testing.

26. At the discretion of the Administrator, other methods may be used to confirm the ongoing compliance of vehicles.

27. Vehicles or components may be acquired through normal commercial channels and independently tested for compliance with specific ADRs. Any such testing uses ADR test procedures and is supervised by the Administrator or appointed agents. The vehicle/component manufacturer may be invited to attend the tests as an observer.

28. Component specification checks may also be performed on randomly selected new vehicles or during the course of a Single Uniform Type Inspection (vehicle inspection).

29. The Administrator may request information such as test reports at any time during or after certification.

Variant Evidence Matrix (Sample; refer clause 12 on page 2)

Attachment 1

Equipment	Options	Variant 1 name			Variant 2 name		
RVD Reference							
Marketing Designation (optional)							
Vehicle Dimensions	Length mm						
	Width mm						
	Height mm						
	Wheelbase mm						
Engine & Transmission	Engine, T/m, Muffler and exhaust Package 1	Std/Opt/ NA	SE 79		Std/Opt/ NA	SE 79	
			SE 81			SE 81	
			SE 83			SE 83	
Tyre and wheel options	Wheel (tyre/wheel rim designation) Package 1	Std/Opt/ NA	SE 23		Std/Opt/ NA	SE 23	
		Front/ Rear/ Both			Front/ Rear/ Both		
Mirrors	External Mirrors LH/RH	Std/Opt/ NA	SE 14		Std/Opt/ NA	SE 14	
	Internal Mirror	Std/Opt/ NA	SE 14		Std/Opt/ NA	SE 14	
Glass	Standard glass Windscreen/ Front/Side/ Rear/Sunroof	Std/Opt/ NA	SE 8		Std/Opt/ NA	SE 8	
Seats & Seatbelts	Front Package 1	Std/Opt/ NA	SE 3		Std/Opt/ NA	SE 3	
			SE 4			SE 4	
			SE 5			SE 5	
	Rear Package 1	Std/Opt/ NA	SE 3		Std/Opt/ NA	SE 3	
			SE 4			SE 4	
			SE 5			SE 5	
Airbags	Front Package 1	Std/Opt/ NA	SE 73		Std/Opt/ NA	SE 73	
	Side/curtain/ head Package 1	Std/Opt/ NA	SE 72		Std/Opt/ NA	SE 72	
Brakes	Unique Braking System Package 1 ABS y/n;front/rear	Std/Opt/ NA	SE 31		Std/Opt/ NA	SE31	
			SE 35			SE 35	