

HDDF-retrofit CoP principles

JF Renaudin
GFV - 03 March 2014

Constraints

- The type-approval authority only knows the retrofitter, not the installers
- Conformity of Production is well defined in section 1 of the 1958 agreement, and the possible rules shall not go further than the rules defined in that section
- The retrofit kit is type-approved, not the vehicle with an installed kit. CoP for the installer cannot be directly regulated.
- Applying specific rules for the installation can only be a decision of the registration authority
- Non-discrimination between installers shall be secured

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CONFORMITY OF PRODUCTION PROCEDURES (1958 agreement)

1. INITIAL ASSESSMENT

- 1.1. The approval authority of a Contracting Party must verify – before granting type approval - the existence of satisfactory arrangements and procedures for ensuring effective control so that vehicles, equipment or parts when in production conform to the approved type.
- 1.2. The requirement in paragraph 1.1. must be verified to the satisfaction of the authority granting type approval but may also be verified, on behalf and at the request of the authority granting type approval, by the approval authority of another Contracting Party. In that case, the latter approval authority prepares a statement of compliance outlining the areas and production facilities it has covered as relevant to the product(s) to be type approved.
- 1.3. The approval authority must also accept the manufacturer's registration to harmonized standard ISO 9002 (the scope of which covers the product(s) to be approved) or an equivalent accreditation standard as satisfying the requirements of paragraph 1.1. The manufacturer must provide details of the registration and undertake to inform the approval authority of any revisions to its validity or scope.

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CONFORMITY OF PRODUCTION PROCEDURES (1958 agreement)

2. CONFORMITY OF PRODUCTION

- 2.1. Every vehicle, equipment or part approved under Regulation annexed to this Agreement must be so manufactured as to conform to the type approved by meeting the requirements of this Appendix and of the said Regulation.
- 2.2. The approval authority of a Contracting Party granting a type approval pursuant to a Regulation annexed to this Agreement must verify the existence of adequate arrangements and documented control plans, to be agreed with the manufacturer for each approval, to carry out at specified intervals those tests or associated checks necessary to verify continued conformity with the approved type, including, specifically, where applicable, tests specified in the said Regulation.

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CONFORMITY OF PRODUCTION PROCEDURES (1958 agreement)

2.3. The holder of the approval must in particular:

- 2.3.1. Ensure the existence of procedures for effective control of the conformity of products (vehicles, equipment or parts) to the type approval; E/ECE/324 E/ECE/TRANS/505 Rev.2 page 13 Appendix 2
- 2.3.2. Have access to the testing equipment necessary for checking the conformity to each approved type;
- 2.3.3. Ensure that test results' data are recorded and that annexed documents remain available for a period to be determined in agreement with the approval authority. This period must not exceed 10 years;
- 2.3.4. Analyze results of each type of test, in order to verify and ensure the stability of the product characteristics, making allowance for variation of an industrial production;
- 2.3.5. Ensure that for each type of product, at least the checks prescribed in this Appendix and the tests prescribed in the applicable Regulations are carried out;
- 2.3.6. Ensure that any set of samples or test pieces giving evidence of nonconformity in the type of test in question gives rise to a further sampling and test. All the necessary steps must be taken to restore conformity of the corresponding production.

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CONFORMITY OF PRODUCTION PROCEDURES (1958 agreement)

2.4. The authority which has granted type approval may at any time verify the conformity control methods applied in each production facility. The normal frequency of these verifications must be consistent with the arrangements (if any) accepted under paragraph 1.2. or 1.3. of this Appendix and be such as to ensure that the relevant controls are reviewed over a period consistent with the climate of trust established by the approval authority.

- 2.4.1. At every inspection, the test records and production records must be available to the visiting inspector.
- 2.4.2. Where the nature of the test is appropriate, the inspector may select samples at random to be tested in the manufacturer's laboratory (or by the Technical Service where the Regulation annexed to this Agreement so provides). The minimum number of samples may be determined according to the results of the manufacturer's own verification.
- 2.4.3. Where the level of control appears unsatisfactory, or when it seems necessary to verify the validity of the tests carried out in application of paragraph 2.4.2., the inspector must select samples to be sent to the Technical Service which conducts the type approval tests.
- 2.4.4. The approval authority may carry out any check or test prescribed in this Appendix or in the applicable Regulation annexed to this Agreement.
- 2.4.5. In cases where unsatisfactory results are found during an inspection, the approval authority must ensure that all necessary steps are taken to restore conformity of production as rapidly as possible.

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Principle 1 (cascading principle)

- As permitted by the 1958 agreement, the Approval authority of the retrofit system will perform
 - At type-approval an initial assessment of the capability of the retrofitter
 - to secure that retrofit kits are and will remain conform to those that have been type-approved and
 - to secure that the installation is performed as it should be
 - After type-approval appropriate audits to verify that
 - the retrofitter is correctly performing the verifications and tests regarding the retrofit kits on which the initial assessment is based
 - the retrofitter is correctly performing the verifications regarding the installation on which the initial assessment is based.

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Principle 2 (ISO 9002 certification)

- Retrofitters and installers shall be ISO 9002 or equiv. certified
 - For retrofitters as permitted by the 1958 agreement, in view of requesting them to have the installers survey in their quality processes and manual
 - For the installer for permitting the initial CoP assessment of the retrofitter and facilitating the survey
 - This is compatible with the 1958 agreement (although not required by it)

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Principle 3 (list of agreed installers)

- Retrofitters shall have an up-to-date list of agreed installers
 - To permit certification authorities (if they so wish) to only permit agreed installers and thereby secure a minimum quality of the installation
 - To enable them to have a real authority as regards the Conformity of the installation
 - A minimum number of agreed installers in a minimum number of MS may be a valuable request from the retrofit Regulation

Principle 4 (withdrawal rights)

- Retrofitters shall have the right to withdraw from their list installers
 - without renewed ISO certificate, or
 - Not taking the appropriate corrective and curative measures in case of non-conformity regarding the installation requirements and tests, or ?
- TAA shall have the right to withdraw type-approval
 - without renewed ISO certificate of the retrofitter, or
 - If the retrofitter has not informed on design changes (hardware of software) related to the retrofit system, or
 - If the retrofitters does not take the appropriate corrective and curative measures in case of non-conformity regarding the retrofit system, or
 - If the retrofitter is not presenting the material he should manage for demonstrating the conformity of its systems, or
 - if the retrofitter is not performing the appropriate management and survey of its agreed installers, or ?