Translated English of Chinese CCC Regulations: CNCA C11-10:2014

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## CNCA / CCC

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## CNCA-C11-10-2014

China Compulsory Certification Implementation Rules -

Door locks and door retention components for motor vehicles

强制性产品认证实施规则 汽车门锁及门保持件

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Wayne Zheng was borne in China in 1962 and migrated to Singapore in 1992. He is now the Sales Manager (Founder and Managing Director) at <a href="https://www.ChineseStandard.net">www.ChineseStandard.net</a>. Wayne Zheng had more than 10 years extensive expertise and hands-on working experiences, through his then-employment as "China Certification Program Manager" at BlackBerry Beijing, and "Product Safety & Compliance (PS&C) Manager" at Motorola Singapore:

- CNCA / China Compulsory Certification (CCC) regulations.
- Hands-on program experience with regulator CNCA for CCC mark's compliance, approval and management.
- Was an authorized representative by then-employer BlackBerry (RIM) to liaise with Chinese regulators, authorities, certification bodies and designated laboratories – including CNCA, CQC, Beijing Communication Authority, Beijing Administration of Quality Supervision Inspection and Quarantine.
- Hands-on program experience with certification body CQC for "certification entrusting", type test, initial factory audit, regular / annual factory audit (i.e. the "after-certification supervision" in this Rules).
- Manage, plan, guide and site-visit the global factories / suppliers' global factories (i.e. the "manufacturing enterprises" in this Rules) in North America, Europe and China for CQC initial factory audit and regular annual factory audit (after-certification supervision).
- ISO Process Auditor, certified by Motorola USA & Motorola Singapore
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#### **0** Introduction

This Rules is established based on the security risk and certification risk of door locks and door retention components for motor vehicles [Translator: hereafter abbreviated as door-lock]. It stipulates the basic principles and requirements for the implementation of China Compulsory Certification for door-locks.

This Rules can be used with other general rules issued by Certification and Accreditation Administration (CNCA), such as "China Compulsory Certification Implementation Rules - Manufacturing Enterprise Classification Management, Certification Mode Selection and Determination", "China Compulsory Certification Implementation Rules - Utilization of Manufacturing Enterprise Testing Resource and Other Certification Results", "China Compulsory Certification Implementation Rules - Factory Inspection General Requirements".

The certification body shall make principles for certification according to the general implementation rules and this Rules and implement them accordingly.

Manufacturing enterprise shall ensure that their certified products are capable of sustaining the compliance with the certification and are compatible with the requirements of the standards.

## 1 Application scope

This Rules applies to:

- (1) Door-locks of side-doors (including sliding doors) or rear doors in M1-category and N1-category vehicles;
- (2) Door hinges of side doors or rear doors in M1-category and N1-category vehicles, excluding sliding rails and other supporting parts.

Due to the changes in the laws, regulations or related product standards, technology, industry policies and other causes which may change the applicable scope, the announcement released by CNCA shall be final and conclusive.

#### 2 Standards for certification

GB 15086 Motor vehicles - Door locks and door retention components - Performance requirements and test methods

In principle, the latest versions of above standards that are issued by the National Standardization Administration shall be executed. When other versions are required to use, then it shall be executed according to the applicable relevant standards issued by the State Certification and Accreditation Administration (CNCA).

#### 3 Certification modes

The basic certification mode of implementing the China Compulsory Certification for door-lock is:

Type test + initial factory inspection + after-certification supervision;

"After-certification supervision" in above basic certification mode refers to 1 of the 3 modes – after certification, follow-up inspection and factory on-site sampling testing OR inspection and sampling testing in the market OR inspection.

The certification body shall follow the requirements of "China Compulsory Certification Implementation Rules - Manufacturing Enterprise Classification Management, Certification Mode Selection and Determination" to carry out the classification management to manufacturing enterprise; consider the results of classification management; on the basis of basic certification mode, appropriately increase the combination of supervision mode after certification, so as to determine the certification mode that is applicable to certification client [TRNASLATOR NOTE is not part of this Rules. Translator note: "certification client", the counterpart of certification body, refers to the Applicant / Manufacturer or its proxy (Power of Attorney). For ease of reading, hereinafter abbreviated as "CLIENT"].

#### 4 Classification of certification units

In principle, the products of the same-function, produced by the same-producer (manufacturer) and same-manufacturing enterprise (location), and having no significant difference in the following aspects could be classified as one certification unit:

#### 4.1 Locks

- (1) Structure type of lock-body and lock-buckle (or block);
- (2) Materials of main components;
- (3) Connection method with the vehicles.

#### 4.2 Hinges

- (1) Structure type of hinges and materials of main components;
- (2) The difference of hinge-pin (length and diameter) is within 20%.

In principle, CLIENT shall put forward the certification entrusting based on the principle of unit classification. It may include multiple "models (or specifications)" products in a same-unit. Same-model refers to those products of which the design has no impact to standard compliance.

For the same-product that is of same-manufacturer but of different manufacturing enterprises, or for the same-model product that is of different manufacturers and of same-manufacturing enterprise, it may consider to only conduct the type test on the samples of 1 unit. The products of other CNCA-C11-10:2014

carry out the "final assembly", Certification Body may likely need to inspect/audit the critical components / sub-assembly supplier].

The factory on-site inspection time shall be made according to the unit quantity of the products, and appropriately consider the production scale of the factory. Normally it needs 1-2 man-days for each factory.

When conducting factory on-site inspection, inspection team shall choose samples randomly from the end of the production line or qualified product in the warehouse. Randomly sampled products are inspected, but not limited to, for the following contents:

- a. The structure and parameters of the products to be certified;
- b. Designated test in factory on-site (selected from production conformity control plan).

If no un-conformance product is found, the inspection result is qualified;

If un-conformance products are found, factory is allowed to make rectifications. Certification body adopts appropriate way to confirm the rectification results. The rectification time must not be more than 3 months. If the rectification cannot be finished on time, or the rectification results are not conformant, the inspection result is unqualified.

If there is significant deviation between production conformity control plan and its implementation situation, or the structure and parameters of the actual products are significantly different from the type test samples, the inspection result is disqualified, and this certification is terminated.

#### 6.3 Certification evaluation and approval

Certification body shall make a comprehensive evaluation to the type test, factory inspection results and relevant information / materials. If the evaluation is PASS, the certificate will be granted according to certification unit. If not, the certification is terminated.

#### 6.4 Time limit of the certification

Certification body shall make specific provisions on each steps of the certification, and determine all relevant work to be done within the time limit. CLIENT shall cooperate with the certification body actively. In general, certificate will be granted to CLIENT within 90 days, since the certification entrusting is accepted.

#### 6.5 Service-parts of vehicles out of production

The requirements of entrusting and certification implementation are shown in Attachment 3.

## 7 After-certification supervision

Certificate's cancellation, suspension and withdrawal shall be implemented in accordance with the "China Compulsory Certification management method" and "Compulsory product certificate cancellation, suspension and withdrawal implementation rules", and relevant regulations of certification body. Certification body shall determine the classification and scope of the product that does not comply with the certification requirements; and adopt appropriate way to publicly announce the certificate of cancellation, suspension and withdrawal.

#### 8.5 Use of the certificate

Use of the certificate shall comply with the requirements of "China Compulsory Certification management method".

#### 9 Certification marks

The management and use of certification marks shall comply with the provisions of "China Compulsory Certification management method".

#### 9.1 Mark style permitted to use

The certified door-lock shall use Safety-type (S) certification mark. The style is as follows:



#### 9.2 Use requirements

The China Compulsory Certification marks shall be printed or molded with non-standard specification.

The marks shall be printed or molded at appropriate position of main-body of the certification product or on the smallest-packaging. When the mark is applied on main-body, it shall be preserved permanently; and be easily seen without damaging the vehicle and the certified products.

According to the characteristic of the product and process, the printing or molding marks can be completed in any stage of the product production.

## 10 Charges

Certification body and laboratory shall base on the national provisions of China Compulsory Certification fees to charge the fees.

Certification body shall, based on the initial factory inspection fees, after-

### **Attachment 2: Production conformity requirements**

Factory shall ensure that the certified products in mass production are consistently in accordance with the requirements of this Rules and relevant laws and regulations.

Notes: Factory in this Rules involves CLIENT, manufacturer and manufacturing enterprise.

- 1. Production conformity inspection is to determine if the products in mass production are consistently in accordance with the requirements of this Rules and relevant laws and regulations through production conformity control plan auditing and factory on-site inspection (initial inspection and supervision)
- 2. Production conformity control plan is the documented provisions for factory to determine if the products in mass production are consistently in accordance with the requirements. It shall include:
- 2.1. Factory shall establish documents to determine if the products in mass production are in accordance with the samples in type test; and the certification marks are well preserved and used.
- 2.2. Factory shall formulate the documentation provisions on necessary products that are to test, inspection, methods, frequency, deviation range, analysis of results, record and maintenance according to implementation rules. And identify the critical components, raw materials, critical manufacturing process, assembly process, and testing process according to certification standard, and determine the control requirements. For those critical components, raw materials, critical manufacturing process, assembly process, and testing process that are not conducted in the factory site, it shall be specifically listed out in plan. And explain the actual department and actual location of the control. For items that are specified by production conformity plan in certification standard, the factory's control provisions must not be lower than the standard requirements.
- 2.3. Factory shall formulate provisions and requirements on products testing or inspection of relevant equipment and staffs in 2.2.
- 2.4. Factory shall formulate provisions on production conformity control plan's change, declaration and implementation.
- 2.5. When factory finds that there is inconformity of products, how the relevant provisions to carry out necessary measures under the supervision of certification body, so as to resume the consistent production.
- 2.6. When factory finds that there is inconformity of products, the provisions are able to trace and handle.

appropriate way to determine the technical requirements on them and ensure the certification requirements on finished products. Records shall also be made. Appropriate control methods include:

- (a) Obtaining the CCC certificate or other compulsory product certificate for finished products, and the factory shall ensure the validity of the certificate.
- (b) For the critical components without certificate, its regular inspection shall be in accordance with product certification implementation rules / detailed-rules.
- (c) The control plan made by factory shall have better or equal effect as mentioned in a and b.
- 3.2.3. When purchasing critical components from distributors and traders, factory shall make appropriate measures to determine if the critical components can consistently meet the technical requirements. For those critical components, sub-assembly, assembly and semi-finished products entrusted to subcontractors, factory shall conduct the control same way as controlling the purchase of critical components, so that all the products can meet the requirements. For self-produced critical components, the control shall be according to the following step 4.

#### 4. Manufacturing processes control

#### 4.1. Processes preparation

- 4.1.1 Factory shall identify and validate the critical production processes. The operators for the critical production processes shall have the appropriate qualification. If the product quality cannot be guaranteed without operating documents, appropriate operating instructions shall be prepared to make production processes under control.
- 4.1.2 Study the critical production processes to verify process capability and provide input for process control.
- 4.1.3 Verification of the production preparation shall be conducted in a suitable manner.
- 4.2 Where environment condition is required, factory shall meet the requirements.
- 4.3 Factory shall monitor and control the appropriate process parameters and product characteristics, as applicable.
- 4.4 Factory shall establish and implement the system for production tooling management and for critical production equipment preventive maintenance to ensure that the equipment can consistently meet the requirements of operation.
- 4.5 Production shall be inspected, monitored and measured at appropriate stages to ensure the product compliance and conformity.
- 4.6 Factory shall establish and implement a system for production trace

# Attachment 3: Certification implementation of service parts for the after-sales maintenance for vehicles out of production

- 1. CLIENT put forward the certification entrusting. Append "After-sales service part for out of production vehicle model xxx" in product name in the application materials (only for xxx service parts)
- 2. CLIENT submit the application materials
  - 1) The vehicle factory provides the out of production certificate for the vehicles (Official seal, not from competent department, such as purchasing or product department)
  - 2) The former compulsory test report of the part
  - 3) The annual usage quantity of the part
  - 4) Materials such as application form and product description, according to the requirements of CCC materials of mass production vehicle's part
- 3. Documentation auditing by designated certification body
- 4. Type test (it can be exempted by inspecting the former compulsory test report )
- 5. Initial factory inspection:
  - 1) Factory that already has CCC certificate of same-category product can be exempted from inspection
  - Factory without certificate needs to be re-inspected. However, the conformity inspection standards can be based on the standards to which the product was type tested
- 6. Evaluation and approval of the certification result

The certificate shall be issued according to units. There shall be a note in the product certificate: after-sales service part for out of production vehicle model xxx

7. Certificate and certification markings

The certification validity of after-sales service part for out of production vehicle shall be made after negotiation between certification body and CLIENT based on risk evaluation, but the period shall not be more than 10 years.

It is allowed to use the unified-printed standard-specification CCC markings by CNCA.

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#### 8. After-certification supervision

Certification body shall consider the manufacturing enterprise classification management and actual situation, formulate a specific plan according to their different supervision method after certification.

The follow-up inspection and/or factory on-site inspection and market sampling test can be in accordance with the standards to which the product was type tested.

During the follow-up inspection, if there is same-category product (not vehicle out of production) obtain the certificate, it is allowed to conduct follow-up inspection or factory on-site inspection on the other same-category products. That is, the aftersales service part of vehicle out of production are not required to be on production.

If there is no same-category products (not vehicles out of production) obtaining the certificate, then:

For in-warehouse type of the after-sales service part of vehicles out of production, the enterprise shall provide evidence for the consistent conformity to relevant requirements. If certification body is not satisfied or doubtful about the evidence, they can conduct factory on-site sampling inspection and test.

For order-form type of the after-sales service part of vehicles out of production, the enterprise shall provide the production record within two years, and shall implement the verification test and maintain the record. Certification body can conduct factory on-site sampling inspection and test.

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