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Implementation Detailed-Rules for China Compulsory Certification

Door locks and door retention components for motor vehicles

汽车门锁及车门保持件

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0. Introduction

“Implementing Detailed-Rules for China Compulsory Certification - Door locks and door retention components for motor vehicles” (hereinafter referred to as **Detailed-Rules**) is compiled based on the requirements of “Implementation Rules for China Compulsory Certification - Door locks and door retention components for motor vehicles” (CNCA-C11-10:2014) (hereinafter referred to as **Implementation-Rules**). This Detailed-Rules is used together with the Implementation-Rules as supportive document.

The product scope, certification basis and all other contents of this Detailed-Rules shall comply with relevant provisions of Implementation Rules. It shall also be adjusted according to the Notices such as defined directory and directory adjustment that are issued by Certification and Accreditation Administration of China (hereafter referred to as **CNCA**).

In accordance with the provisions of Implementation Rules, following the principles of maintaining the effectiveness of product certification, improving quality of product, serving certification companies, and controlling risk of certification, CQC formulates and issues this Detailed-Rules. Through establishing the classification management requirements of manufacturing enterprises, and combining the classification of manufacturing enterprises, this Detailed-Rules determines the implementation requirements for China Compulsory Certification of Door locks and door retention components for motor vehicles” (hereinafter referred to as **Door-locks**).

0.1 Terms and definitions

0.0.1 Testing at Manufacturer's Premises (abbreviated as TMP mode)

It means that the engineers of designated laboratory use the testing equipment in the factory laboratory to conduct testing. The factory shall dispatch test personnel to provide assistance. The designated laboratory will examine, approve and issue the test report.

0.1.2 Witnessed Manufacturer's Testing (abbreviated as WMT mode)

It means that the engineer of designated laboratory witnesses the factory laboratory's test conditions and all tests completed by using the laboratory's equipment or according to the test plan submitted; or witnesses part of the test conditions and the test items. Test personnel of the factory laboratory shall provide the original records and draft up the test report together with the engineer of designated laboratory according to relevant provisions. The designated laboratory shall audit, approve and issue the test report.

0.2 Classification Management Requirements of Manufacturing Enterprises

CQC collects and sorts-out all the information related to certification products and quality related to manufacturing enterprises; and uses dynamic classification management for manufacturing enterprises. certification entrusting client [hereafter abbreviated as **CLIENT**],

Requirements of Testing Resources and Other Certification Results of the Manufacturing Enterprise” and the certification standards, then the CLIENT, manufacturer, or manufacturing enterprise can apply for testing to utilize the testing resources of the manufacturing enterprise (hereinafter referred to as the factory laboratory) and perform the self-inspection. The self-inspection result and relevant materials shall be submitted to CQC for review. The factory laboratories of which the materials pass the review are allowed to perform TMP or WMT (hereinafter also referred to as on-site test) with factory laboratory resources.

In principle, CQC shall not organize inspection only for factory laboratory. Generally, factory laboratory inspection application of the CLIENT shall be proposed together with on-site test application. CQC shall organize the technical specialists from designated laboratories to perform both inspections. Inspection group shall inspect the laboratory capability first; and keep the relevant inspection and assessment record; after conformance, then perform production on-site inspection.

0.3.3 Qualification maintenance

CQC shall perform regular (such as once a year, or adjusted according to frequency) supervision to the certified factory laboratory. In principle, laboratory supervision shall be made together with after-certification supervision. Factory laboratory shall take part in contrast test to ensure the test accuracy and maintain the qualification.

When it is needed by the manufacturing enterprise, it can perform single test in response to the on-site test raised by CLIENT; the test result is only applicable to this on-site test. The factory laboratory may be exempted from supervision to maintain the qualification. When there is same-item requiring for on-site test, application for approval shall be made again.

1. Application scope

It applies to:

- (1) Door-lock lock-body and assembly of side-doors (including sliding door) or back-doors that are used for passenger access on categories M₁ and N₁ vehicles;
- (2) Door-hinge of side-doors or back-doors that are used for passenger access on categories M₁ and N₁ vehicles, excluding guide rail and other supporting parts of sliding door.

Scope adjustment due to change of relevant laws or regulations, relevant product standards, technologies and industry policies and other factors shall be subject to the notice issued by the CNCA.

CLIENT shall prepare samples in accordance with type test plan, and send the samples to designated laboratory. When required by CLIENT, CQC may arrange inspectors to sample when performing production conformity inspection of 6.2.3. In this case, Sampling shall be made on the premise that factory inspection is concluded as qualified; or there is conformity item, it needs the written-mode to verify the effectiveness of corrective measures.

In principle, manufacturing enterprises shall send the samples to designated laboratory within 20 days for type test. In the case that CLIENT fails to send the samples to designated laboratory on time, reasonable explanations shall be made to CQC.

6.1.2.3 Sample specification and quantity for type test

(1) Load test

Side-door lock: four sets of the same model;

Back-door lock: five sets of the same model;

Side-door hinge: 2xn sets of the same model (n refers to the quantity of the door-hinges of the same door. For example, n=2 means the two hinges from the top and the bottom respectively; n=1 refers to single door-hinge; n>2 refers to the piano-type hinge, hereinafter the same);

Back door hinge: product type test samples are 3xn sets of the same model within the certification-unit.

(2) Inertial load: When choosing the methods of vehicle dynamic test or door dynamic test, CLIENT shall provide corresponding vehicles or door components.

(3) If, within the same unit, it contains various models, CLIENT shall also send other models and parts, besides major model, for conducting difference-test according to the testing plan.

6.1.2.4 Relevant requirements of critical components / raw materials

For related critical components / raw materials in test plan, such as door locks, relevant test items of critical components / raw materials can be exempted - if the manufacturer or manufacturing enterprise can provide the compulsory product certificate or voluntary certificate issued by designated organization that comply with the requirements. Certification results in such certificates may be adopted by CQC after review. Special critical components / raw materials test items stipulated by technical resolution of technical expert group may also accept the valid test report issued by GB/T 27025 (ISO/IEC 17025) qualified laboratory.

6.1.3 Test Items and Requirements

Type test items are applicable to standard in Article 2 of this Detailed-Rules.

For inertial load, CLIENT can choose one or more methods from calculation, vehicle dynamic test, or door dynamic test to conduct type test.

If the CNCA technical expert group has special requirements, the resolution made by the group shall prevail.

For the door-locks and door retention components for motor vehicles that are not yet listed in this Detailed-Rules, manufacturer shall consciously execute and abide by the national safety and environmental laws, regulations and compulsory requirements of relevant standards.

6.1.4 Implementation of Type Test

6.1.4.1 Type test shall be performed in the laboratory designated by the CNCA. When performing type test, the laboratory shall ensure the accuracy and authenticity of test conclusion; record and keep the whole test procedures; make sure the test process and test result are traceable. If there is abnormality in the test, the laboratory shall contact CQC and handle it accordingly.

6.1.4.2 If there are unqualified test items, the CLIENT has the right to make corrections after analyzing the failure for further retest. In this case, the laboratory shall inform the certification body; and the certification body shall confirm the test plan again.

Generally, the CLIENT shall complete the correction within 90 days, and provide the valid corrected materials/samples to the designated laboratory/CQC. If it exceeds 90 days, it is deemed that the CLIENT gives up and terminates the certification entrusting. The CLIENT may terminate the certification by itself. CQC shall arrange personnel for sampling from corrected samples. If the factory inspection has been completed, necessity of extra factory inspection shall be determined based on failure reasons and failed items.

6.1.4.3 Type test shall not exceed 20 working days (counted from the day when samples arrive the laboratory); time for correction and retest due to sample failure or test items failure is not counted in it. Time-limit of new test after correction is the same as type test.

6.1.5 Type Test Report

CQC shall formulate the unified format of type test report.

The laboratory shall issue type test reports in the unified format. The laboratory and its related personnel shall be responsible for correctness of the content and test conclusions of the type test reports made by them. The laboratory shall issue type test report to CQC and to CLIENT timely when test is completed. Test report shall include descriptions of related information of other products in the unit (when required by CQC) and of certification.

6.2.2.2 When production conformity control plan is approved, CQC shall establish factory site inspection plan for production conformity. The inspection plan shall include the products to be inspected, sites and scope.

6.2.2.3 Review period for production conformity control plan depends on unit number of applied products, and takes production scale of factory into consideration. Generally, the review period is one or two man-days for each factory.

6.2.3 Factory site inspection for production conformity

6.2.3.1 Implementation of factory site inspection

Generally, production conformity inspection shall be made at factory site, after type test and review of production conformity control plan are approved. According to the needs, type test and factory site inspection may also be made at the same time.

CQC delegates the compulsory product certification inspectors with national registered qualification to form an inspection team to make the site inspection of production conformity in accordance with Attachment II of the Implementation-Rules. Entrusted certification products shall be in production during the factory site inspection. When necessary, site inspection can be extended to sites of the CLIENT and manufacturer.

6.2.3.2 When performing factory site inspection, the inspection team shall randomly sample qualified products at the processing site to carry out following inspections, including but not limit to:

- (1) Structure and parameters of certified products, including model, specification, and critical components;
- (2) On-site designated test of certified products (selected from production conformity control plan).

6.2.3.3 Result of factory inspection

- (1) Inspection result shall be qualified if there is no unqualified item;
- (2) Unqualified items in factory inspection are allowed to be corrected, and the certification body shall adopt reasonable manner to confirm the correction result. Correcting time shall not exceed 3 months. If the correction is not finished within 3 months, or correction result is not qualified, the inspection result shall be unqualified.
- (3) If it is found that production conformity control plan significantly deviates from the implementation, or produced products have significant difference in structure and parameters with type test samples, then the inspection result is unqualified.

If inspection result is unqualified, then the certification is terminated.

7.2 Sampling Test or Inspection at the Production On-site

7.2.1 Principle of Test or Inspection at the Production On-site

CLIENT, manufacturer, and manufacturing enterprise shall collaborate when after-certification follow-up inspection is made in form of sampling test or inspection at the production on-site.

7.2.2 Contents of Test or Inspection at the Production On-site

7.2.2.1 CQC, based on enterprise category and certification risks, establishes plan of annual or special sampling test at production on-site, including requirements of sampling/sealing, test standard and items, and laboratory information. Test items shall comply with the resolution that is made by the CNCA technical expert team. Sampling test items can be increased or sample quantity can be reduced in consideration of risks.

CQC shall delegate personnel to sample according to sampling plan at the production line, warehouse, or port (limited to overseas certified factory). Samples shall be qualified products that have been confirmed by the manufacturer or manufacturing enterprise. The manufacturer or manufacturing enterprise shall send the samples within 10 days after sampling of CQC.

7.2.2.2 Utilization of factory test resources

For category A or B enterprises, manufacturers or manufacturing enterprises may apply for on-site test. After CQC's approval, the designated laboratory may send qualified staffs to perform on-site test by utilizing the factory test resources, provided the manufacturing enterprises meet all requirements of certification standards, *Implementation Rules for China Compulsory Certification - Utilization requirements of Manufacturing Enterprise Test Resources and other Certification Result*, and the conditions required by Article 0.3 of this Detailed-Rules; and agree to use the test resources. On-site test shall be made according to sampling test plan; designated laboratory shall issue test report when the test is qualified. If the manufacturer or manufacturing enterprise has utilized the factory resources for testing for at least 5 consecutive years, in principle, the samples shall be sent to designated laboratory for testing, so as to avoid systematic risks.

7.3 Market Sampling Test or Inspection

7.3.1 Principle of Market Sampling Test or Inspection

CQC performs market sampling for category B, C and D enterprises when necessary on the basis of enterprise classification management and certification risk.

7.3.2 Contents of Market Sampling Test or Inspection

CQC establishes market sampling test or inspection plan by selecting some or all of the test items from type test items, according to quality condition of different products.

inspection result, and other related materials/information. If the evaluation is approved, the certificate can be kept and used continuously. If there is any unqualified item, the evaluation of after-certification supervision result is unqualified; CQC shall decide to suspend or withdraw the certificate accordingly and issue the decision.

8. Certificate

8.1 Maintenance of the certificate

The validity of the product certificate under coverage of the Implementation-Rules is 5 years. Within the period, maintenance of the validity of the certificate depends on the after-certification supervision of the certification body.

When the certificate is going to be expired and needs to be extended, the CLIENT shall submit the certification entrusting 90 days prior to the expiration. The certificate can be directly replaced with a new one provided the last after-certification supervision within the validity period of certificate is qualified.

8.2 Content of the Certificate

Certified products and the sales packages shall be labeled with the content that is contained in the certificate; it shall be consistent with the content in the certificate. Change of the certificate shall specify the changed edition number to clearly show the changing times of the products.

8.3 Change of the Certificate

8.3.1 Change Content

- (1) Contents in the certificate are changed (such as name and address of the CLIENT, manufacturer or manufacturing enterprise, model and specification, certification standards, etc.);
- (2) Technical changes of certified products (such as design, structure parameters, critical components / raw materials, etc.) which may affect the conformity with relevant standards;
- (3) Change in production conformity control plan, production conditions, relocation etc. of the factory that may affect the production conformity;
- (4) Change in other items as specified by CQC, such as it is changed to certificate of service-parts of discontinued vehicle model.

8.3.1 Implementation of Change

When above changes happen, CLIENT shall apply for change-entrusting to CQC according to the requirements of Article 5.1 of this Detailed-Rules; the change can be

implemented after approval of the certification body.

8.3.2 Evaluation and Approval of Change

CQC, based on the change contents, evaluates the provided documents to determine the approval of change. If sample test and / or factory inspection is necessary, CQC shall respectively develop sample test plan and production conformity factory on-site inspection plan. The change shall be approved only after the test and/or inspection is qualified.

Change shall be approved when conforming to the requirements. In case of certificate replacement, code number and approved effective date are not changed in principle, and approved date of change shall be noted. If new certificate is not necessary, issue the change confirmation sheet; note the change contents and approved date of change. For certificate change, it shall also note the edition number information of the change to clearly show change-times of the product.

8.3.3 Utilization of Factory Test Resources

For category A or B factories, if the manufacturing enterprises meet all requirements of certification standards, *Implementation Rules for China Compulsory Certification - Utilization requirements of Manufacturing Enterprise Test Resources and other Certification Result*, and the conditions required by Article 0.3 of this Detailed-Rules; and agree to use the factory test resources to implement on-site test (or witness test), when change application needs sample test, manufacturers or manufacturing enterprises may apply for on-site test. After CQC's approval, the designated laboratory may send qualified staffs to perform on-site test by utilizing the factory test resources. On-site test shall be made according to sampling test plan; designated laboratory shall issue test report when the test is qualified. If the manufacturer or manufacturing enterprise has utilized the factory resources for testing for at least 5 consecutive years, in principle, the samples shall be sent to designated laboratory for testing, so as to avoid systematic risks.

8.3.4 When certification standards are revised or edited or there is new explanation for articles of the standards, CQC shall determine certification standard changing period and certification implementation plan, and issue them to the society, in accordance with relevant requirements of Notice on Relevant Requirements of Revising the Standards for Compulsory Product Certification, the 4th notice of the CNCA in 2012, and the technical expert team resolution. CQC shall provide the CLIENT with accurate standard modification information in detail; the CLIENT shall complete the standard edition change within the specified period issued by CQC.

8.4 Cancellation, Suspension and Withdrawal of the Certificate

Cancellation, suspension and withdrawal of the certificate shall be implemented in accordance with "China Compulsory Certification management method" and "Compulsory product certificate cancellation, suspension and withdrawal implementation rules", as well as related regulations of CQC. CQC shall define the product category and scope that do

Attachment I Requirements of Production Conformity

Control Plan

The object of production conformity control is to make sure mass-produced certified products are consistent with approved certified products. The factory shall establish production conformity control plan for certified products according to Attachment II of the Implementation-Rules. Conformity of production (or COP) control plan shall at least contain the following contents:

1. COF test (test, inspection or check) control plan;

The factory shall establish necessary check, test and inspection plan according to certification standards.

If certification standards specify the items for COF, the test provisions of the factory shall not be lower than the requirements of standards.

For the door-lock or hinge of each certification-unit, the production conformity testing items are all applicable items in chapter 2 of this standard, and the frequency is at least once a year, except that inertial load test can be conducted when the structure and material of the products change.

After-certification supervision sampling test can also be treated as COF test result.

COF control plan shall at least include following item:

- (1) Test scope and responsibilities, and specification of test capacity and requirements of test laboratory;
- (2) Test items, including off-production test items and items in certification standards;
- (3) Test procedures;
- (4) Test frequency;
- (5) Requirements of sampling and samples;
- (6) Test result evaluation conditions (qualified or unqualified shall be determined respectively);
- (7) Analysis, record and preserving requirements of test result;
- (8) Correction, prevention and non-conformity control measures when test result is unqualified.

Relevant documents or articles can be directly referenced into production conformity control plan, provided the factory has already established independent quality control program, production guidance or control plan (similar to Appendix A of GB/T 18305 (ISO/TS 16949)) for production conformity test.

2. Control plan for critical components or raw materials

The factory, based on the manufacturing processes, shall control the critical components or raw materials that may affect the production conformity, at least including (if applicable): lock baseboard, ratchet-and-pawl, card-board, lock-buckle, stopper, hinge pin and hinge. When above parts are made by the factory, corresponding raw materials shall be controlled. Control plan shall at least include name, model/specification, supplier, purchasing inspection items and frequency of critical components or raw materials.

Production conformity control plan can make principle requirements to above mentioned critical components; detailed critical components or raw materials list shall be provided with product description of each unit.

Relevant documents or articles can be directly referenced into production conformity control plan, if the factory has already established independent quality control program, production guidance or control plan for production conformity test.

3. Control of compulsory product certificate and certification mark

Relevant documents or articles can be directly referenced into production conformity control plan, if the factory has already established independent quality control program, production guidance.

4. Control of certification change

Relevant documents or articles can be directly referenced into production conformity control plan, provided the factory has already established independent quality control program, production guidance.

5. Correction, prevention and recall measures upon production inconformity

Relevant documents or articles can be directly referenced into production conformity control plan, if the factory has already established independent quality control program, production guidance.

6. Upgrade of certification references and relevant laws and regulations

Relevant documents or articles can be directly referenced into production conformity control plan, if the factory has already established independent quality control program, production guidance.

7. Requirements of quality assurance capacity of the factory

6. Evaluation and approval of certification result

Certificate shall be issued by certification-unit. Product name shall be appended with "service parts for XXX discontinued vehicle model" in the certificate.

7. Certificate and certification mark

Validity period of certificate for service parts of discontinued vehicle model is determined through discussion between certification body and CLIENT on the basis of risk evaluation. However, it must not be longer than 10 years.

Standard specification certification mark printed uniformly by the CNCA is allowed to use.

8. After-certification supervision

8.1 On the basis of manufacturing enterprise classification management and actual conditions, certification body shall establish particular test program according to different after-certification supervision modes of different factories. After-certification follow-up inspection and/or production on-site test, market sampling test and inspection can be carried out according to the standards when it was type approved.

8.2 After-certification follow-up inspection

If mass-produced products (not service parts for discontinued vehicle models) have been certified, then the follow-up inspection and/or production on-site sampling test and inspection can only be performed on mass-produced products; it is not required that the service parts for discontinued vehicle models must be in production.

If there is no mass-produced product (not service part for discontinued vehicle models) certified, then:

- (1) For warehouse service parts for discontinued vehicle models, the enterprise shall provide proof of continuous conformity with standards of the service parts for discontinued vehicle models. If the certification body is not satisfied or doubts about the proof provided by the enterprise, then production on-site sampling test and inspection is required.
- (2) For service parts for discontinued vehicle model with orders, there shall be production record in recent two years. The enterprise shall perform test of the service parts for discontinued vehicle model and keep the test record. Certification body can carry out site sampling test and inspection according to the risk conditions.

9. Change of certificate

In principle, certified service parts for discontinued vehicle model are not allowed to change in model, specification, design, structure parameter, and critical components / raw

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