

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 0-12-0

TEST FACILITY INSPECTION

1. INTRODUCTION

Under the provisions of the *Motor Vehicle Standards Act 1989*, test facilities conducting tests for compliance with the Australian Design Rules (ADRs) are inspected to assess their “fitness to test” to the ADR requirements.

In addition, during a Test Facility Inspection (TFI), original test reports from which Summary of Evidence Reports (SERs) have been prepared will be selected for detailed examination using audit principles determined by the Administrator.

Note:

The inspection of a Test Facility should not be construed as an approval of the Test Facility or any test procedure used or an endorsement of the results of any tests performed.

2. GENERAL REQUIREMENT FOR TEST FACILITIES

To aid in the orderly inspection of Test Facilities, a Test Facility Inspection Manual has been prepared as a guide for inspecting officers. The manual contains the general circulars described below and a Test Procedure Circular for each ADR. The manual is published on the ADR CD-ROM.

2.1. General Circulars

- Circular 0-12-1 - 'Introduction to Test Facility Inspections' General information on Test Facility Inspection for inspecting officers and Test Facilities.
- Circular 0-12-2 - 'General Requirements for Test Facilities' Describes organisation, staffing and administrative arrangements that may be expected in a Test Facility; also testing practices, record systems and reporting.
- Circular 0-12-3 - 'General Requirement for Calibration of Test Facility Equipment and Instrumentation' Describes equipment and instrumentation expected to be encountered in ADR testing, frequency of calibration and reference standards, and includes two annexes:

Annex 1 'General ADR Tests'

Annex 2 'Vehicle Emission Tests'.

- Circular 0-12-4 - 'General Requirements for Engineering Records' Describes engineering records systems that may be used by a vehicle design department for consideration when examining drawings and specifications of components concerned in ADR testing and their identification.
- Circular 0-12-5 - 'General Photometric Test Procedures' Describes the general photometric test procedures for vehicle lighting requirements.
- Circular 0-12-6 - 'Devices for use in Defining and Measuring Motor Vehicle Seating Accommodation' Describes the typical procedures for the use of a two dimensional drafting

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template and a three dimensional testing machine to define and measure vehicle seating accommodation.

- Circular 0-12-7 - 'Motor Vehicle Driver's Eye Range' (95th Percentile Eye Ellipses) Describes procedures for locating a set of two dimensional drafting templates to allow a uniform method of describing and measuring the driver's direct and indirect fields of views.

2.2. ADR Test Procedures

ADR Test Procedures are based on the ADRs, referenced recommended practices and good testing practice. They are intended as guides for the Departmental officers or agents during facility inspections and test observation.

Other equipment and procedures may be used provided they achieve the same results as those described. These test procedures may also be useful to vehicle manufacturers and testing organisations conducting ADR testing.

Note:

Nothing in these test procedures absolves the manufacturer from complying with the primary requirements as specified in the ADRs.

3. TEST FACILITY EQUIPMENT MANUALS

Test Facilities conducting tests to the ADRs are required to retain Test Facility Equipment Manuals describing the organisation, equipment and instrumentation, calibration and standards used in the Test Facility as part of their normal arrangements. Such manuals should be kept up to date as changes occur. They will be used as the basis for the inspection of the test facilities. Circular 0-12-2 and 0-12-3, may be of assistance in preparing such manuals.

The examination of a Test Facility Equipment Manual or conduct of a Test Facility Inspection is not a pre-requisite for approval of SERs.

4. NATIONAL ASSOCIATION OF TESTING AUTHORITIES (NATA), AUSTRALIA, AND INTERNATIONAL LABORATORY ACCREDITATION COOPERATION (ILAC); REGISTRATION FOR ADR TESTING.

NATA accreditation of a Test Facility for particular ADR tests will be accepted by the Administrator as an acceptable standard of "fitness to test" for that ADR. In addition Test Facilities conducting testing to ADRs will also be accepted by the Administrator as an acceptable standard of "fitness to test" for those ADRs provided that the Test Facility has been assessed and recognised as competent for ADR testing by an ILAC Arrangement signatory accreditation body.

In addition, those Test Facilities conducting testing to obtain ECE Approvals for ADRs will not normally be subject to a TFI.

When such NATA accreditations or ILAC Arrangement accreditations are held, regular inspections will not normally be conducted.

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When a test facility holds NATA registration or ILAC Arrangement accreditation, a Test Facility Equipment Manual different from or separate to an equivalent manual required by NATA or ILAC will not be required.

However, under the conditions of issue of an Identification Plate Approval the Administrator retains the right to conduct additional inspections if required. Notwithstanding NATA accreditation or ILAC Arrangement accreditation, the opportunity to observe ADR testing will be taken whenever possible.

5. OVERSEAS AGENCY ARRANGEMENTS

In cases where overseas test facilities do not hold ILAC Arrangement accreditation for ADR testing, inspection arrangements have been made with Regulatory Authorities and National Testing Agencies in some countries where testing is conducted for vehicles that are supplied in Australia. These organisations act as agents for the Administrator to inspect test facilities and witness tests demonstrating ADR compliance.

The Administrator will determine the TFI program for each agent which will include:

- arrangements with vehicle manufacturers, parts suppliers or contract test facilities;
- Test Facility to be inspected;
- proposed date of inspection;
- the applicable Australian Design Rules;
- any specific item to be checked in the Test Facility;
- report on the test facility's "fitness to test".

Agency inspections of ADR test facilities will only be carried out on specific instructions from the Administrator. They may be conducted at the same time as the agency carries out inspections of such facilities servicing their own type inspection/approval arrangements; in these situations the Australian inspection component may be limited to any unique ADR requirements.

TFIs may be carried out in conjunction with Conformity of Production audits with prior agreement of the test facilities concerned and the Administrator.

6. TEST FACILITY INSPECTION PROCEDURES

Inspection of test facilities will normally be conducted at intervals of 1 to 5 years except where NATA registration or ILAC Arrangement accreditation applies (as described in Section 4 above).

6.1. Selection of Test Facility for Inspection

Selection of test facilities for inspection will be based upon factors including:

- the complexity and relative importance of the ADR;
- the previous inspection history of the facility.

These factors will be weighed when programming an inspection schedule.

6.2. Contact with Test Facility

The Test Facility will normally be advised of the proposed inspection six weeks before the proposed inspection date. Advice will be sought on the facility's ADR testing program so that tests may coincide

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with the inspection. If no ADR tests are scheduled for a reasonable period, the inspection may proceed without witnessing tests. The Test Facility Equipment Manual may be called for at this time as a basis for conducting the inspection.

The duration of the TFI is normally one day.

When a contract testing organisation or a supplier is to be inspected, a representative from one of the client vehicle manufacturers may be invited to be present during the inspection if all parties agree.

6.3. Preparation for Inspection

The test facility will be advised of the Departmental Inspectors, the ADRs to be inspected and the agenda at least two weeks before the scheduled inspection date.

For overseas agents, the SERs to be the subject of the inspection will be forwarded to the Agent for preparation purposes.

6.4. Procedure for Inspection of Test Facility

- On arrival at the Test Facility the inspectors will hold a meeting with the management to review the range of testing conducted, the organisation and any arrangements necessary for the smooth conduct of the inspection.
- Test Facility Equipment Manuals and ADR documentation will be reviewed together with Test Facility identification data.
- Previous inspection reports will be reviewed.
- Test facilities and instrumentation, calibration procedures, records and reference standards will be inspected with particular emphasis on reporting methods, original data acquisition, verification and checking of data including computer programs if used and accuracy of reports.
- A demonstration or certification test may be witnessed (if appropriate)
- Selection of original test reports for audit purposes will be made at this point; see Section 6.7.
- A final meeting with Test Facility management will be held to advise of any Corrective Action Requests (CARs) which the Test Facility needs to address. At this time dialogue between the parties may resolve any perceived problems.

6.5. Notification of outcome of Test Facility Inspection

During the final meeting with the Test Facility management (refer 6.4), a copy of the written report to the Administrator will be made available. This will include an assessment of whether the audit was generally satisfactory or unsatisfactory. This assessment will depend on the number and significance of any CARs, which are categorised as follows:

NC : Non conformance – non compliance with applicable ADRs, Administrators circulars, certification arrangements or test procedures.

AC : Areas of concern – potential for non conformances.

OI : Opportunity for improvement/suggestions/recommendations.

- 6.5.1. The assessment will be generally satisfactory if there are no non conformances (NCs). The Test 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.

- 6.5.2. The assessment will be unsatisfactory if there are one or more non conformances (NCs). The Administrator will consider the circumstances and decide on an appropriate course of action. This action may include varying Identification Plate Approvals (IPAs) which utilise the Test Facility's test results in demonstrating compliance with applicable ADRs, imposing additional conditions (e.g. third party inspection) or suspending or cancelling the IPA. Depending on the significance of the NCs raised, the intention is usually to allow the facility time to take corrective action and continue operating while corrective actions addressing all CARs (NC, AC and OI) are put into place.

6.6. Procedure when Witnessing Tests

The witnessing of tests demonstrating compliance to an ADR will include:

- Identification of components or system to be tested.
- Preparation of components/system for test.
- Preparation of test equipment and instrumentation including test equipment set up, calibration and method of recording data.
- Test procedure and conduct of test.
- Analysis of result.

Note:

1. Witnessing of a test and the inspector's report does not replace the test report prepared by the facility.
2. During the testing program, when calibration curves are made or other data recorded the inspector may verify the record by signing and dating if satisfied with the results.

6.7. Procedure for Audit of an Original Test Report

An original test report from which a SER has been prepared will be obtained for detailed examination during a Test Facility inspection visit as described in Section 6.4.

- 6.7.1. The purpose of examination of the original test report at the Test Facility is to validate its identity and completeness, including demonstration of compliance with ADR requirements, and that all the cross references to the SERs are correct.
- 6.7.2. If the test report is in a language other than English, a request will be made for an English translation to be sent to the Administrator within four weeks.
- 6.7.3. Where the audit finds that the test report does not accurately reflect the tests done, or that the procedures followed are not in accordance with the requirements, these findings will be included in the report to the Test Facility. The Test Facility is responsible for resolving those findings. Where those findings relate to the submission of evidence to

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the Administrator, they must be addressed in consultation with the vehicle manufacturer (Approval holder) by correction of the SERs. The implications of such findings on vehicles will be considered by the Administrator in consultation with the vehicle manufacturer.

6.7.4. A copy of the test report may be required for reference to assist in resolving findings.

7. CONFIDENTIALITY OF INFORMATION

Any data supplied by a Test Facility to the Administrator will be held 'Commercial-in-Confidence'.

Where a specialist supplier or contracting testing organisation is concerned, data will be held

'Commercial-in-Confidence' between these

parties, the vehicle manufacturer concerned and the Administrator.

8. TEST FACILITY IDENTIFICATION NUMBERS

Each Test Facility is uniquely identified by a number and prefixed with T.

The Test Facility Identification (TFID) number is an essential part of the certification system and shall be quoted on all SERs for entry into the Road Vehicle Certification System. Omission of this number in the SER may delay processing of the IPA application. When checking records ensure that the TFID number is included in the relevant documents.