

VRA®
CERTIFICATION

UK Vehicle Recycler Certification Scheme Rules

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1 INTRODUCTION

- 1.1.1 VRA Certification Ltd (VRAC) is a company limited by guarantee whose purpose is to act as the administrator of the **UK Vehicle Recycler Certification Scheme**.
- 1.1.2 This document sets out the rules to be followed by:
- Certification bodies appointed by VRAC; and
 - UK vehicle recyclers obtaining and maintaining certification.
- 1.1.3 Certification is to the **UK Standard for Reclaimed Parts from End-Of-Life Vehicles** (the 'standard') which was developed by the Vehicle Recyclers' Association, the UK's leading trade body for vehicle recycling professionals. Its purpose is to provide end users of reclaimed vehicle parts with the confidence that:
- A reclaimed vehicle part has been accurately identified, recorded, tested, removed and sold by a vehicle recycler that operates a robust quality management system; and that
 - A reclaimed vehicle part has been marketed and sold by a vehicle recycler that has, and abides by, the appropriate environmental authorisations.

2 SCOPE

- 2.1.1 The UK Vehicle Recycler Certification Scheme is limited to the United Kingdom and the Republic of Ireland and shall be governed by English law.
- 2.1.2 The scheme applies to UK-based vehicle recyclers operating at an end-of-life vehicle authorised treatment facility (ATF). Certification applies to an individual permitted authorised treatment facility, and is not transferrable to any other authorised treatment facility operated by the same vehicle recycler (i.e. multi-site operators).
- 2.1.3 Certification is to the **UK Standard for Reclaimed Parts from End-Of-Life Vehicles** (the 'standard') and includes conformance assessment of a vehicle recycler's policies and procedures at a specified ATF; specifically, it includes requirements for:
- A target parts quality management system;
 - End-of-life vehicle acquisition and identification;
 - Parts grading, testing, recording and storage; and
 - Parts marketing, sale, delivery and traceability.

3 DEFINITIONS

auditor: An appropriately competent individual acting on behalf of a certification body to observe satisfactory evidence at an authorised treatment facility to confirm conformance by the vehicle recycler to the standard.

authorised treatment facility (ATF): A site located in either the United Kingdom or Republic of Ireland at which end-of-life vehicles are dismantled and recycled that operates under an appropriate environmental permit or licence issued by the relevant environmental regulator.

certificate suspension: The temporary suspension of a certificate issued by a certification body.

certificate revocation: The cancellation of certification issued by a certification body.

certification assessment code: A unique number assigned to each vehicle recycler upon application that will be used to identify the vehicle recycler and the relevant authorised treatment facility.

certification body: a third-party conformity assessment body operating certification services.

conformance: certification status where the vehicle recycler's policies, procedures and systems at an ATF comply fully with the standard's criteria.

nominated contact: An appropriately competent individual nominated by a vehicle recycler to act as the primary contact with the certification body. This person shall be competent in the management and implementation of the ATF's policies, procedures and systems relevant to the standard.

non- conformance (major): certification status where the vehicle recycler's policies, procedures and systems at the ATF do not comply with the standard's criteria and require significant amendments/ modifications in order to ensure full conformance.

non-conformance (minor): certification status where the vehicle recycler's policies, procedures and systems at the ATF broadly comply with the standard's criteria but require some amendments/ modifications to improve and ensure full conformance.

regulatory body: a public organisation or government agency set up to exercise a regulatory function. This includes, but is not limited to, the Environment Agency, Environmental Protection Agency, Health and Safety Executive, Natural Resources Wales, Northern Ireland Environment Agency, Scottish Environment Protection Agency, a relevant local authority.

standard: The UK Standard for Reclaimed Parts from End-Of-Life Vehicles. The latest version shall apply, subject to any transitional phase deemed necessary by VRA Certification Ltd.

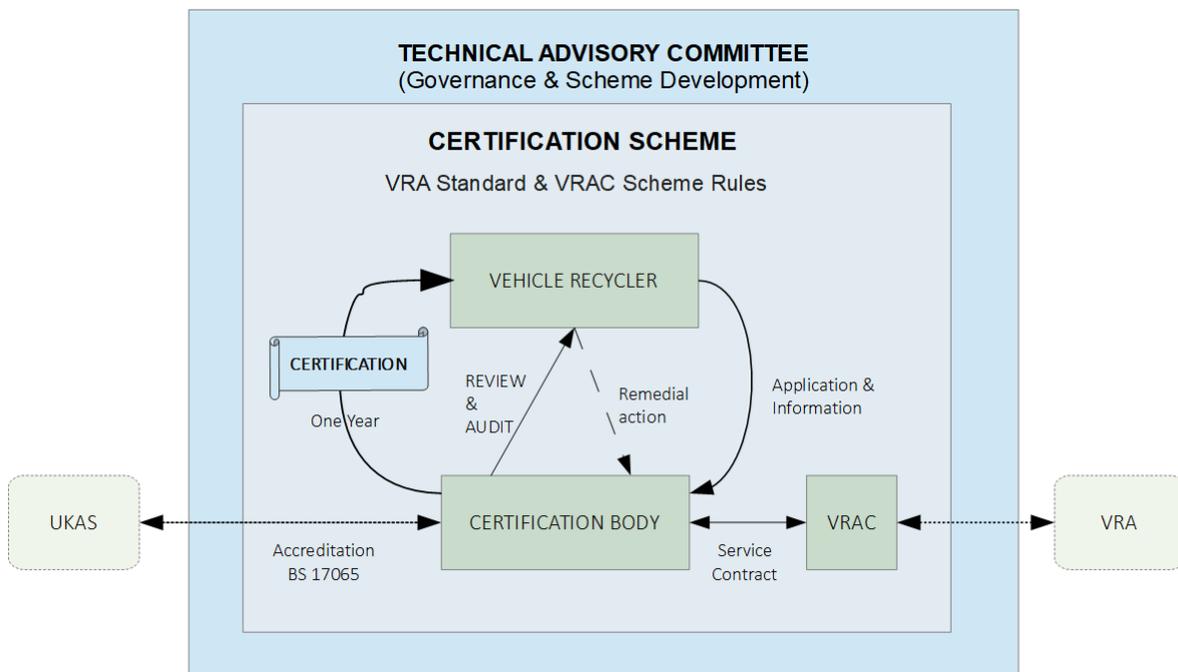
target part: A vehicle part that has demand for re-use and that the vehicle recycler removes from an end-of-life vehicle for re-use. Such a part can also be referred to as a reclaimed, re-usable, recycled or green part.

vehicle recycler: A business whose primary purpose consists of purchasing total loss and end-of-life vehicles for the purpose of dismantling them, harvesting and selling the component parts, and other environmentally and legally required recycling processes.

4 CERTIFICATION SCHEME OVERVIEW

- 4.1.1 The relationship between Vehicle Recycler Certification Ltd, the vehicle recycler, certification body and the technical advisory committee are shown in Figure 1. Responsibilities are set out in Section 5.
- 4.1.2 VRAC is a company independent of both the Vehicle Recyclers’ Association and certification bodies.

Figure 1 – Vehicle recycler scheme overview and relationship between parties



5 RESPONSIBILITIES

5.1 VRA Certification Ltd

- 5.1.1 **VRA Certification Ltd (VRAC)** is an independent company limited by guarantee whose sole purpose is to manage the **UK Vehicle Recycler Certification Scheme**.
- 5.1.2 VRAC is the owner of the UK Vehicle Recycler Certification Scheme and shall have responsibility for the following:
- Promotion and management of the scheme;
 - Development of the scheme, including its scheme rules and accompanying guidance;
 - Appointment and contract management of the certification bodies;
 - Dissemination of relevant information to certification bodies and vehicle recyclers;
 - Provision of certification logo and template certificate to certification bodies;
 - Dissemination of information about certified vehicle recyclers; and
 - Co-ordination of the Technical Advisory Committee.
- 5.1.3 VRAC shall appoint a minimum of two certification bodies to offer independent third-party assessment of conformance by UK vehicle recyclers to the UK Standard for Reclaimed Parts from End-of-Life Vehicles (the 'standard').
- 5.1.4 Only certification bodies appointed by VRAC shall provide certification services to the standard and claim conformance with these scheme rules.

5.2 Certification bodies

- 5.2.1 Each appointed certification body shall provide certification services in line with the contract agreed with VRAC.

5.2.2 Each appointed certification body shall either:

- Hold valid accreditation by the United Kingdom Accreditation Service to BS EN ISO/IEC 17065:2012¹; or
- Provide evidence to VRAC of conformance with the criteria in BS EN ISO/IEC 17065:2012.

5.2.3 Certification of every vehicle recycler shall, as a minimum, include the following:

- Application processing;
- Initial assessment of conformance by the vehicle recycler to the standard. This shall include a desk-top review of submitted documents and at least one on-site audit;
- Certification decision and communication of this to both the vehicle recycler and VRAC;
- Provision of certification documentation;
- Annual review and reassessment of conformance to the standard, including a minimum of one on-site audit;
- Reassessment following a non- conformant audit or minor non- conformances;
- Suspension or revocation of certification;
- Record keeping;
- Surveillance;
- Appeals and complaints; and
- Reporting regularly to VRAC.

5.2.4 Each certification body shall ensure that when inspecting and certifying a vehicle recycler that its activities are confined to matters relating to the standard and associated scheme rules.

5.2.5 A certification body or any of its sub-contractors, auditors, consortium partners or related organisations shall not provide consultancy services, or any services, that might compromise the certification body's impartiality in respect of the scheme².

¹ BS EN ISO/IEC 17065:2012 Conformity assessment — Requirements for bodies certifying products, processes and services.

² A certification body may offer guidance about interpretation of the requirements of the scheme but shall not offer specific advice on how to implement its requirements or how to address non-conformances.

- 5.2.6 A certification body may charge a vehicle recycler a fee for providing certification services. These shall be set annually and provided to VRAC for publication on the VRAC website. Each certification body shall be responsible for ensuring that these charges are sufficient to cover the cost of providing certification services and the royalty fee³ due to VRAC.

5.3 Vehicle recyclers

- 5.3.1 A vehicle recycler shall choose a VRAC appointed certification body to provide certification services.
- 5.3.2 Each vehicle recycler shall ensure, so far as reasonably practicable, that:
- The application form is completed accurately, and that all accompanying information requested by the certification body is provided in a timely manner;
 - That requests by the certification body are answered in a timely manner;
 - That access to the end-of-life vehicle authorised treatment facility site by the certification body's auditor for auditing purposes is granted following due notification by the certification body; and
 - That the agreed fee will be paid in accordance with the certification body's terms and conditions.

5.4 Technical Advisory Committee

- 5.4.1 The Technical Advisory Committee shall oversee the governance of the Vehicle Recycler Certification Scheme. The purpose of the Technical Advisory Committee is to:
- Ensure that the scheme operates impartially and fairly;
 - Ensure that the scheme operates effectively in accordance with the scheme rules;
 - Review the scheme rules periodically: as a minimum annually, or more frequently as and when deemed appropriate;
 - Provide suggestions to the Vehicle Recyclers' Association on amendments/improvements to the standard;

³ As defined in the contract between the certification body and VRAC.

- Review any technical, legal or policy developments that may affect the principles and/or operation of the certification scheme;
- Review any complaints and/or appeals by a vehicle recycler that a certification body has been unable to resolve to the satisfaction of both parties;
- Review any complaints or suggestions for improvement by a certification body; and
- Oversee further development of the certification scheme.

5.4.2 The Technical Advisory Committee shall comprise a minimum of five independent experts drawn from a range of sectors relevant to vehicle recycling and the supply, marketing, sale and use of reclaimed parts. Members may include, but are not limited to:

- Motor vehicle insurance company/companies;
- Bodyshop garage representatives;
- Online selling platform;
- Industry software providers;
- Vehicle Recyclers' Association;
- Vehicle recycler(s);
- A representative from each of the appointed Certification Bodies; and
- Government.

5.4.3 The Committee shall be subjected to separate terms of reference and meet at least annually.

6 SCHEME PROCEDURES

6.1 Purpose

6.1.1 The scheme procedures set out criteria for the following:

- How a vehicle recycler shall apply to a certification body;
- How the application shall be assessed;
- How the vehicle recycler's ATF shall be audited;
- How non- conformances shall be managed;
- How certification shall be awarded;
- How renewals shall be processed and sites re-audited;
- How certification suspensions and revocations shall be managed; and
- How complaints and/or appeals shall be managed.

6.1.2 These scheme procedures shall be read in conjunction with the standard.

6.1.3 Certification bodies shall carry out certification services in line with BS EN ISO/IEC 17065:2012.

6.2 Application for certification

6.2.1 A vehicle recycler shall apply to a certification body approved by VRAC. The application shall be made either by the owner of the business or a duly authorised employee (e.g. person with responsibility for conformance with the scheme's requirements).

6.2.2 The certification body shall provide the applicant vehicle recycler with:

- An application form;
- Terms and conditions of engagement including fees (including confidentiality agreements);
- Appropriate information regarding the certification process; and
- A list of all documentation required to assess the application.

- 6.2.3 The vehicle recycler shall nominate a key contact person who will be competent in the management and implementation of the ATF's policies, procedures and systems relevant to the standard. This person shall act as the primary contact with the certification body.
- 6.2.4 The certification body shall nominate an auditor or other appropriately competent individual who will act as the primary contact with the vehicle recycler.
- 6.2.5 The vehicle recycler shall compile all relevant documentation required by the certification body, including the application form, and submit these in an appropriate format for initial review.
- 6.2.6 The vehicle recycler shall pay the certification body fee as set out in the certification body's terms and conditions.
- 6.2.7 The vehicle recycler shall only apply to one certification body within any 12-month period.

6.3 Application review

- 6.3.1 Upon receipt of the completed application form and fee from the vehicle recycler, the certification body shall:
- Assign a unique certification assessment code to the vehicle recycler and the specified ATF;
 - Acknowledge receipt to the vehicle recycler within three working days, including notification of the unique certification assessment code; and
 - Inform VRAC within three working days, including notification of the unique certification assessment code.
- 6.3.2 The certification body shall review the information supplied by the applicant vehicle recycler within 10 working days of receipt of the documentation and fee.
- 6.3.3 The certification body shall review the information supplied by the applicant vehicle recycler and assess it against the following criteria:
- Conformance with the scope of the standard (Sections 2.1 and 2.2);
 - The vehicle recycler's depollution and recycling process (Standard Section 5.1);
 - The vehicle recycler's quality management system (Standard Section 5.2);

- The vehicle recycler's staffing, including training and competency of all staff involved in the assessment and grading of target parts (Standard Section 5.3)⁴;
 - The vehicle recycler's record keeping system(s) (Standard Section 5.4).
- 6.3.4 The certification body shall ensure that sufficient information has been provided by the vehicle recycler to confirm that, as a minimum, the scope of the standard (Sections 2.1 and 2.2) has been met.
- 6.3.5 The certification body shall obtain confirmation⁵ from the vehicle recycler that they have the relevant written policies and procedures in place in order to meet the General Requirements of the standard (Section 5):
- The vehicle recycler's depollution and recycling process (Standard Section 5.1);
 - The vehicle recycler's quality management system (Standard Section 5.2);
 - The vehicle recycler's staffing, including training and competency of all staff involved in the assessment and grading of target parts (Standard Section 5.3); and
 - The vehicle recycler's record keeping system(s) (Standard Section 5.4).
- 6.3.6 The application review shall take a maximum of one working day to complete.
- 6.3.7 A vehicle recycler that takes longer than three months to implement changes and provide evidence of conformance to Sections 2 and 5 of the standard may be subject to an additional processing fee as set out by the certification body in their terms and conditions.

6.4 Site audit

- 6.4.1 Once the certification body is satisfied that the Scope of the standard has been met and the vehicle recycler has confirmed that they have the relevant written policies and procedures in place in order to meet the General Requirements (Section 5) of the standard, the certification auditor shall arrange with the vehicle recycler a mutually convenient date to audit the ATF. A minimum of ten working days' notice shall be given in advance of all site audits.

⁴ During the implementation phase of the certification scheme (Section 9), special considerations shall be made for the number of allowable minor non-conformances and the requirement for all quality control technicians to have attended an external training course.

⁵ This may be verbal, by email or by letter.

- 6.4.2 The purpose of the audit is for the certification body's auditor to observe satisfactory evidence to confirm conformance by the vehicle recycler to the standard, as follows:
- General Requirements (Section 5), including any outstanding evidence (including written procedures) not supplied during the application process;
 - End-of-Life Vehicle Acquisition and Identification (Section 6);
 - Parts Grading, Testing, Recording and Storage (Section 7); and
 - Target Parts Marketing, Sale, Delivery and Traceability (Section 8).
- 6.4.3 The vehicle recycler's nominated competent individual shall accompany the certification body's auditor throughout the audit and provide them with reasonable access to observe systems, policies, procedures⁶ and staff. The audit shall include, but is not limited to:
- An observation of all operational areas relevant to the standard, including vehicle processing areas, target parts storage and target parts sale/dispatch areas; and
 - An observation of the site's stock or inventory management system, including record keeping, and vehicle and parts traceability.
- 6.4.4 The certification body's auditor shall audit each vehicle recycler's ATF against the standard in an objective and impartial manner using the conformance assessment criteria specified in Section 6.5.
- 6.4.5 The certification body's auditor reserves the right to take photographs during the audit for reporting purposes to the vehicle recycler, VRAC and the Technical Advisory Committee. This shall be subject to a confidentiality agreement between the certification body and the vehicle recycler.
- 6.4.6 The certification body's auditor reserves the right to terminate an audit at his/her discretion in the event of any of the following:
- Unsafe/unhealthy working practices on-site that would present an unacceptable risk to the safety/health of the auditor;
 - Absence of the vehicle recycler's nominated contact person;
 - Failure/inability of the vehicle recycler to allow the auditor access to observe on-site operational areas;
 - Failure/inability of the vehicle recycler to allow the auditor access to observe the site's stock or inventory management system;

⁶ These may be digital, paper-based or a combination of the two.

- Presence of a third party who may intentionally or otherwise, seek to influence the outcome of the audit; and
 - A threat of harm or retribution to the auditor.
- 6.4.7 In the event that a certification body's auditor terminates a site audit for any of the reasons specified in Section 6.4.6, the certification body shall notify the vehicle recycler and VRAC in writing within three working days, setting out the reasons for termination of the audit and any improvements that need to be made prior to re-audit. The vehicle recycler shall be required to pay the audit fee to the certification body, as set out within the certification body's terms and conditions.
- 6.4.8 The site audit shall take a maximum of one working day to complete.
- 6.4.9 The certification body reserves the right to carry out an additional on-site audit(s) in the event of any the following occurring since application to the scheme:
- A major non-conformance requiring significant remedial action;
 - A complaint by a customer that the vehicle recycler was unable to resolve satisfactorily;
 - A terminated audit in accordance with Section 6.4.6.
 - Prosecution being taken by a regulatory body⁷; and/or
 - A significant event causing business disruption and/or system change (e.g. fire, data corruption or change in the site's stock or inventory management system).
- 6.4.10 The certification body shall agree a daily rate for additional audits, set out in their terms and conditions during application.
- 6.4.11 The certification body shall endeavour to review as much information as possible remotely before arranging an additional audit.
- 6.4.12 During the scheme's implementation phase (Section 9), any additional site audit shall require approval by VRAC.

⁷ These include, but are not limited to: the Environment Agency, Health and Safety Executive, Natural Resources Wales, Northern Ireland Environment Agency, Scottish Environment Protection Agency, a relevant local authority.

6.5 Conformance assessment

- 6.5.1 The certification auditor shall assess the vehicle recycler's policies, procedures and systems at the ATF for conformance against the standard's criteria:
- Scope of the standard (Section 2, including all sub-sections);
 - General requirements (Section 5, including all sub-sections);
 - End-of-life vehicle acquisition and identification (Section 6, including all sub-sections);
 - Parts grading, testing, recording and storage (Section 7, including all sub-sections); and
 - Parts marketing, sale, delivery and traceability (Section 8, including all sub-sections).
- 6.5.2 Conformance to the standard's criteria, including all sub-sections, shall be assessed as either:
- **Conforming** – the vehicle recycler's policies, procedures and systems at the ATF comply fully with the standard's criteria;
 - **Non-conforming (minor)** - the vehicle recycler's policies, procedures and systems at the ATF broadly comply with the standard's criteria, but require some amendments/modifications to improve them and ensure full conformance; or
 - **Non- conforming (major)** - - the vehicle recycler's policies, procedures and systems at the ATF do not comply with the standard's criteria and require significant amendments/modifications in order to ensure full conformance.
- 6.5.3 The certification body shall set a target for improvement for all major and minor non-conformances in accordance with Section 6.7 (Post Audit Reporting).

6.6 Certification criteria

- 6.6.1 Following review of the vehicle recycler's application (including all relevant documentation) and the site audit, the certification body shall decide whether the vehicle recycler's authorised treatment facility conforms to the standard and whether certification shall be awarded.
- 6.6.2 Certification shall be awarded in accordance with the following criteria:
- The vehicle recycler's ATF is deemed by the certification body to conform fully with the standard; or

- The vehicle recycler's ATF is deemed by the certification body to conform fully with the standard's scope (Section 2) and by over two-thirds of the criteria in Sections 5, 6, 7 and 8 of the standard⁸, with the remaining criteria being assessed as minor non-conformances (less than a third%)⁹.
During the certification scheme's implementation phase (Section 9; Timescales), the number of minor non-conformances may be increased to 50% following prior agreement with VRAC¹⁰.

6.6.3 Certification shall be awarded within ten working days of the site audit.

6.6.4 Certification shall not be awarded in any of the following circumstances:

- The vehicle recycler's ATF falls outside of the scope of the standard (Section 2);
- The vehicle recycler fails to pay the certification fee to the certification body in accordance with the certification body's terms and conditions;
- The certification auditor identifies at least one major non-conformance during the site audit; or
- The vehicle recycler is subjected to prosecution by a regulatory body within three months prior to scheme application, or during the application phase.

6.7 Post audit reporting

6.7.1 The certification body shall submit a report¹¹ to both the vehicle recycler and VRAC within ten working days of the audit. This shall set out the main findings of the document review and on-site audit. The report shall contain:

- The certification decision;
- The certification auditor's assessment of conformance against the standard's criteria;
- A list of recommendations or advice; and
- A list of actions that need to be carried out to address any identified minor and major non-conformities.

⁸ VRAC will provide guidance on how this will be implemented.

⁹ There is a total of 21 criteria specified in Sections 5, 6 and 7 of the standard. This means that a vehicle recycler shall need to have 14 or more criteria assessed as compliant for certification to be awarded.

¹⁰ This is to allow the vehicle recycler time to improve policies, procedures and operational practices, some of which may take a number of months to become effective. All non-conformances identified by the certification body will be accompanied by SMART targets for improvement.

¹¹ This may be in the form of a table summarising key findings, including certification decision, and any advice or actions set.

- 6.7.2 All actions shall be Specific, Measurable, Attainable, Realistic/Relevant and Time Bound (SMART) and shall be agreed between the auditor and vehicle recycler.

6.8 Award of certification

- 6.8.1 The certification body shall notify both the vehicle recycler and VRAC of its decision to award certification within ten working days of either:
- The site audit; or
 - Completion of actions identified during the audit to the satisfaction of the certification body. This may require an additional site audit in accordance with Section 6.4 (Site Audit).
- 6.8.2 The certification body shall issue a certificate to the vehicle recycler within 15 working days of its decision to award certification.
- 6.8.3 The certificate shall contain the following information as a minimum:
- Name and contact details of the vehicle recycler;
 - Name and address of the audited authorised treatment facility¹²;
 - The unique certification assessment code;
 - Statement of conformance to the standard;
 - VRAC's conformity mark;
 - Certificate issue and 'valid from' date;
 - Certificate 'valid to' or expiry date;
 - Certification body name and address; and
 - Signature of the person who authorised the certificate.
- 6.8.4 The certificate is valid for one calendar year from the date of certification.
- 6.8.5 The certificate is non-transferable between vehicle recyclers and/or ATFs and remains the property of the certification body.

¹² NOTE: Certification applies to an individual permitted authorised treatment facility, and is not transferrable to any other authorised treatment facility operated by the same vehicle recycler (i.e. multi-site operators).

6.9 Declaration of certification

- 6.9.1 The vehicle recycler shall only claim conformance for target parts that have been removed, processed and marketed at a certified ATF.
- 6.9.2 The vehicle recycler shall ensure that when claiming conformance to the standard in the marketing and sale of a target part, it is accompanied by a statement:
- Stating the name of the certified ATF; and
 - Stating the unique certification assessment code.
- 6.9.3 The vehicle recycler shall only use the VRAC's mark of conformity (logo) (see Figure 2) on relevant marketing and sales literature, emails and/or websites to accompany target parts that have been removed, processed and marketed at a certified ATF. This shall be subject to VRAC's separate terms and conditions.

Figure 2 – VRAC conformity logo



6.10 Suspension and/or revocation of certification

- 6.10.1 A certification body may suspend certification under any of the following circumstances:
- Prosecution by a regulatory body since the certification date;
 - Claims of conformance by the vehicle recycler for target parts removed, processed and marketed at a non-certified ATF;
 - A major non-conformance requiring significant remedial action;

- Failure to pay the certification body's fees as set out in the certification body's terms and conditions;
 - A significant event causing business disruption and/or system change (e.g. fire, data corruption or change in the site's stock or inventory management system) and/or any significant change in the way in which the site is operated; or
 - Actions by the vehicle recycler that are deemed by VRAC to bring the vehicle recycling industry or this certification scheme into disrepute.
- 6.10.2 The certification body shall inform both the vehicle recycler and VRAC that certification has been revoked and set out a timeframe for remedial action by the vehicle recycler to address the reasons for revocation.
- 6.10.3 The certification body shall either review additional documentation and/or information supplied by the vehicle recycler at the certification body's request or re-audit the site in response to suspension of certification. A re-audit shall be subject to Sections 6.4.11 and 6.4.12)
- 6.10.4 Following the satisfactory supply of additional documentation and/or information by the vehicle recycler and/or additional site audit to address the reasons for suspension, the certification body shall reinstate certification. In these circumstances, the certification body shall inform the vehicle recycler and VRAC in writing within five working days. The certification body may charge an additional fee to cover these services; these shall be set out in the certification body's terms and conditions.
- 6.10.5 Following reinstatement, certification shall only remain valid up until the date at which it originally due to expire, after which the vehicle recycler shall reapply for certification in accordance with Section 6.11 (Renewal of Certification).
- 6.10.6 A vehicle recycler who has not provided satisfactory evidence to the certification body and/or been subjected to a satisfactory audit to address the reasons for suspension of certification within three calendar months shall have their certification revoked. The certification body shall inform the vehicle recycler and VRAC in writing within five working days of the lapse of the three-month time limit.
- 6.10.7 A vehicle recycler who has not paid the certification body's fees as set out in their terms and conditions shall have their certification revoked.
- 6.10.8 The vehicle recycler shall not claim conformity to the standard for any target parts originating at an ATF that has had its certification suspended or revoked. This shall include, but is not limited to, use of the conformity mark on any marketing and/or sales literature (including paper and electronic formats).

- 6.10.9 A vehicle recycler who has had their certification revoked and wishes to regain certification shall apply to a certification body in accordance with Section 6.2 (Application for certification).

6.11 Renewal of certification

- 6.11.1 The vehicle recycler shall take responsibility for maintaining and renewing certification.
- 6.11.2 A minimum of six weeks before certification is due to expire, the certification body shall write to the vehicle recycler requesting the following:
- An update on the vehicle recycler's policies, procedures and systems relevant to the standard;
 - A statement confirming that the vehicle recycler has not been subject to any prosecution served by a regulatory body since the certification date;
 - A statement confirming that there has not been a significant event causing business disruption and/or system change (e.g. fire, data corruption or change in the site's stock or inventory management system) and/or any significant change in the way in which the site is operated.
- 6.11.3 The certification body shall re-audit the vehicle recycler's ATF within a maximum of six weeks before or six weeks after the due date of certification expiry in accordance with Sections 6.4 (Site Audit), 6.5 (Conformance Assessment) and 6.7 (Post Audit Reporting). During the period between certification expiry and certification renewal, the vehicle recycler shall be deemed to be certified, as long as this does not exceed six weeks from the date of expiry.
- 6.11.4 A vehicle recycler that is deemed by the certification body to conform to the standard in accordance with Sections 6.5 (Conformance Assessment) and 6.6. (Certification Criteria) shall have their certification renewed from the date of expiry in accordance with Section 6.8 (Award of Certification).
- 6.11.5 A vehicle recycler who does not conform to the standard in accordance with Section 6.5 (Conformance Assessment) and 6.6. (Certification Criteria) shall have their certification suspended or revoked in accordance with Section 6.10 (Suspension and/or revocation of certification).
- 6.11.6 The certification body shall issue an updated certificate to the vehicle recycler conforming that the standard has been met in accordance with Section 6.8 (Award of Certification).

6.11.7 The vehicle recycler shall pay the certification body a fee for recertification as set out in the certification body's terms and conditions. The fee shall be paid irrespective of whether recertification is granted.

6.12 Notification of changes

6.12.1 The vehicle recycler shall notify both the certification body and VRAC of any of the following:

- Change in ownership of the vehicle recycler or ATF;
- Change of a site's nominated contact;
- Change of address or contact details of the vehicle recycler¹³;
- A major non-conformance requiring significant remedial action;
- A significant event causing business disruption and/or system change (e.g. fire, data corruption or change in the site's stock or inventory management system);
- Prosecution by a regulatory body.

6.13 Random spot audits and information requests

6.13.1 The certification body reserves the right to re-audit a site prior to the renewal period set out in Section 6.11 (Renewal of Certification) in response to market intelligence or complaint. The certification body shall inform both the vehicle recycler and VRAC of their intention to re-audit the site, giving a minimum of 48 hours' notice.

6.13.2 The certification body reserves the right to request and obtain additional information from the vehicle recycler following certification in response to market intelligence or complaint.

¹³ For example, change in head office or accounts department.

7 CONFIDENTIALITY

- 7.1.1 Information supplied by a vehicle recycler to a certification body, VRAC and the Technical Advisory Committee shall be treated as company confidential and shall not be disclosed to any third-party unless required by statute or the express permission of the vehicle recycler has been granted.
- 7.1.2 A certification body shall share contact information about certified vehicle recyclers, including whether they have had their certification suspended or withdrawn, with VRAC for the purposes of scheme administration, promotion, development and reporting to online market platforms.
- 7.1.3 A certification body shall share additional information about a vehicle recycler with VRAC and the Technical Advisory Committee for the purposes of standardisation, scheme development and in response to a complaint or appeal (Section 8).

8 COMPLAINTS AND APPEALS

COMPLAINT BY A VEHICLE RECYCLER ABOUT A CERTIFICATION BODY

- 8.1.1 In the event of a complaint by a vehicle recycler about a certification body being made to VRAC, VRAC shall write to both the certification body and the chair of the Technical Advisory Committee within five working days, setting out the nature of the complaint and requesting relevant information from the certification body.
- 8.1.2 The certification body shall then reply to VRAC within five working days supplying, so far as reasonably practicable, the requested information.
- 8.1.3 VRAC shall send this information to the Technical Advisory Committee who will then review the information and decide whether or not to uphold the complaint within fifteen working days.
- 8.1.4 VRAC shall inform both the certification body and vehicle recycler of the Technical Advisory Committee's decision within five working days.

COMPLAINT BY A CERTIFICATION BODY

- 8.1.5 In the event of a complaint being made by a certification body about the scheme or about a vehicle recycler, the procedures outlined in Clauses 8.1.1, 8.1.2, 8.1.3 and 8.1.4 shall be followed.

COMPLAINT BY OTHER PARTIES

- 8.1.6 In the event of a complaint being made by another party to VRAC, VRAC shall write to the complainant confirming receipt of the complaint within five working days.
- 8.1.7 VRAC shall write to the relevant vehicle recycler, certification body and chair of the Technical Advisory Committee informing them of the nature of the complaint and seeking additional information within five working days.
- 8.1.8 VRAC and the Technical Advisory Committee shall then decide within five working days whether the complaint relates to the certification scheme itself, or whether it relates to a regulatory issue.

- 8.1.9 VRAC shall write to the complainant within five working days of receipt of the decision by the Technical Advisory Committee and relay their decision about whether or not to uphold the complaint or to direct the complainant to the appropriate regulatory body. In the event that the complaint about the certification scheme is upheld, the Technical Advisory Committee shall then consider the implication of this and make recommendations for improvement at its next meeting.

APPEALS

- 8.1.10 A vehicle recycler has the right to appeal a certification decision made by a certification body. In the first instance, the vehicle recycler shall appeal to the certification body and follow the certification body's appeals procedure. If the outcome of this is not to the satisfaction of the vehicle recycler, the vehicle recycler may then appeal to VRAC in writing.
- 8.1.11 VRAC shall write to both the certification body and the chair of the Technical Advisory Committee within five working days, setting out the nature of the appeal and requesting relevant information from the certification body.
- 8.1.12 The certification body shall then reply to VRAC within five working days supplying, so far as reasonably practicable, the requested information.
- 8.1.13 VRAC shall send this information to the Technical Advisory Committee who will then review the information and decide whether or not to uphold the appeal within fifteen working days.
- 8.1.14 VRAC shall inform both the certification body and vehicle recycler of the Technical Advisory Committee's decision within five working days.

9 TIMESCALES & SPECIAL CONSIDERATIONS

- 9.1.1 These scheme rules shall come into force on 1 July 2021.
- 9.1.2 The period from 1 July 2021 until 31 December 2021 shall be deemed to be the implementation phase, during which time special consideration shall be given to certain certification criteria and associated conformance timeframes may be adjusted to enable a vehicle recycler to develop systems, policies and procedures to meet the standard. These will be assessed on a case-by-case basis by the certification body and require agreement by VRAC.
- 9.1.3 During the implementation phase, special consideration shall include the following:
- Scheme Rules Section 6.6.2 Certification criteria – the number of minor non-conformances may be increased to 50% following prior agreement with VRAC.

9.2 COVID-19 travel restrictions and remote (desk) audits

- 9.2.1 This is relevant under the following circumstances:
- When national and/or local rules prevent travel by a certification body auditor to a vehicle recycler's authorised treatment facility (ATF); and/or
 - When a certification body assesses that there is a health risk associated with implementing an on-site audit that cannot be reduced to an acceptable level through recognised, relevant control measures.
- 9.2.2 Remote (desk) audits shall only be carried out for vehicle recyclers deemed to present a low risk of non-conformance during the Phase 1 desk review of the company's permits/licences, policies and procedures.
- 9.2.3 Should a vehicle recycler be deemed to present a moderate to high risk of non-conformance during the Phase 1 desk review, the certification body shall seek to obtain additional information from the vehicle recycler until the risk can be assessed as low.

- 9.2.4 Should either the vehicle recycler's primary contact person and/or the certification body's auditor be required to self-isolate, then the on-site audit shall be rescheduled, or suitably qualified and knowledgeable replacement personnel identified to act as substitutes.
- 9.2.5 The certification body shall record the reason why an on-site audit could not be carried out and notify VRAC at the next VRAC-Certification Body meeting.
- 9.2.6 The certification body shall have a documented policy that addresses how all relevant clauses of the standard shall be audited remotely. Evidence may be obtained by any of the following means:
- Additional written/photographic/video information provided by the vehicle recycler; and/or
 - Telephone conversations; and/or
 - Video conferencing.
- 9.2.7 The certification body shall ensure that the remote auditing methods employed, and the relevant auditing decisions referenced against the standard, are adequately recorded.