

Independent Compliance Administration of Voluntary Aftermarket Converter Certification Program

This document outlines the process ensuring compliance with the voluntary industry program for certifying aftermarket catalytic converters through the use of an independent 3rd party. (Ref. *Proposed Industry Program for Voluntary Aftermarket Converter Certification*, Oct. 2016). The program administrator will have two primary responsibilities:

1. Review new aftermarket converter certification requests from participating companies to determine if they comply with the voluntary standard, and if so, issue an approval.
2. Conduct periodic field surveillance of parts being marketed under voluntary industry program to determine if they comply with the program.

New Aftermarket Converter Certification

- Aftermarket Converter Manufacturer (Manufacturer) initiates a new converter certification program according to process laid out in “Voluntary Aftermarket Converter Program” (VACP) document
 - Manufacturer defines the class and tier of vehicles to be covered
 - Manufacturer contracts directly with independent 3rd party source(s) to age test parts and conduct emission testing per program requirements
 - Emission testing to be conducted at a lab listed on CARB’s list of recognized test labs
 - Manufacturer assembles certification submission as defined by program requirements
- Manufacturer submits the certification request to the designated 3rd party program administrator
 - Submission to include an “application fee” to cover the cost of program administration
- Administrator reviews the submission for compliance with the VACP requirements
 - Directs questions and/or requests for clarifications to Manufacturer
- Administrator, if all requirements have been met, issues New Aftermarket Converter Certification (NACC) to Manufacturer for parts covered in the certification submission
 - Administrator will have 30 days from time of receipt to issue an approval or rejection
- Administrator will maintain a list of all NACC’s, by manufacturer on a publicly accessible web site
- Once an approval is issued the Manufacturer is free to market new parts per conditions of VACP and NACC
 - Manufacturers may use an approved logo on all packaging, labelling and marketing material, subject to the terms of the NACC
 - Manufacturers will permanently mark all parts with a manufacturer code, NACC number issued by the Administrator and the date of manufacture (MM-YYYY)

Amendments to Existing NACC

Manufacturer may request modification, or expansion of an existing NACC by completing appropriate testing and submitting the results to the Administrator. The administrator will amend the vehicle application list for the NACC provided there are no changes to the original catalyst specifications.

Ongoing Compliance Surveillance

- Manufacturer pays annual fee to Administrator for each active NACC it markets to cover costs of compliance surveillance
- Manufacturer will provide Administrator with copies of current application catalogs and list of 3rd party electronic catalog sites for which the manufacturer has supplied vehicle application data
- Manufacturer will report to the Administrator on their annual unit sales of all parts covered by each NACC
- Administrator conducts annual surveillance & enforcement program for each NACC it has issued
 - Administrator will acquire sample parts for each NACC on the open market through independent retail channel
 - Administrator will review application catalog(s) to confirm that parts are marketed for only those applications covered by NACC
 - Administrator will conduct material testing to determine that parts meet the specifications submitted by the manufacturer in the original NACC submission.
 - Tests will include:
 - Physical dimensions & characteristics of the converter and the catalyst substrate
 - Material analysis for PGM composition and total loading
 - Material analysis for washcoat composition and density
 - If sales of parts with a given NACC exceed a certain annual unit quantity [tbd], the Administrator will conduct emission performance testing to confirm the parts meet the standards of the original NACC
 - Administrator notifies the Manufacturer of the results of the compliance testing
 - If parts are to be found to not conform to NACC, the Administrator can impose penalties up to and including the withdrawal of the NACC in question
 - Notice of withdrawn NACC will be posted on program's public website