



Your partner in speciality engineering plastics compounds

WITCOM

A member of Wittenburg Group

Witcom Engineering Plastics B.V.
Penningweg 52
4879 AG Etten-Leur
The Netherlands
Tel: +31 (0) 76 504 3080
Fax: +31 (0) 76 504 3081
Mail: info@witcombv.nl

To Whom It Concerns

6.12.2019

Ref: Wittenburg Group position with respect to Automotive IATF accreditation and the assignment of a Products Safety Representative (PSCR/PSB) as required by VW Formel Q

ISO accreditations, Automotive standards

Witcom Engineering Plastics B.V. and Zhuhai Xunfeng Special Plastics Co. Ltd are part of the Wittenburg group, consisting of Witcom Engineering Plastics in Etten-Leur, the Netherlands, Wittenburg B.V. in Zeewolde, the Netherlands and Zhuhai Xunfeng Special Plastics Co. Ltd in Zhuhai, China.

Accreditations of the Wittenburg Group include ISO 9001, ISO 14001 and ISO 13485 (ISO system for medical applications), and based on recent audits by major automotive OEMs we have confidence that we are also compliant with IATF 16949 for automotive business (no accreditation yet).

We are aware of the relevant laws and regulations for automotive applications in Europe (ECE) and the USA counterpart FMVSS (Federal Motor Vehicle Safety Standards), sources of legal information, product liability requirements for manufacturers, recalls and reasons for their increased occurrence, product safety and management systems requirements (including differences in accents between ISO9001:2015 and IATF16949:2016), handling special characteristics, documentation and traceability requirements, and last but not least the qualifications, responsibilities of and expectations from a Product Safety Officer (PSB/PSCR) as required by Formel Q.

PSB/PSCR

The main tasks which need to be performed by the PSB/PSCR are prevention of defects (using all kinds of tools including DFMEA, PFMEA, Poka Yoke,...), implementation of lessons learned, definition of special (critical) product and process characteristics, assessment of potential failure risks, assessment of risks of supplier/subcontractor changes, contingency planning, continuous confirmation of product safety during production, etc. Such tasks and activities are currently embedded in our Quality Assurance organisation. In the position of the Wittenburg Group as a raw material supplier, we cannot oversee and control the whole supply chain and monitor automotive application throughout their whole life cycle, and therefore we are not in the position to accept unreasonable liabilities.

It is important to recognize in this respect that Witcom and Xunfeng are legally protected by supply conditions which are sent to all customers at every quotation process. These supply conditions dictate that any claims imposed on Witcom as selling party cannot be higher than the value of the goods supplied (Art. 10.1), and that the buyer has maximum 6 months time to assess if the good supplied are in conformance with the agreed product specifications (Art. 9.1). Since we cannot oversee the whole supply chain, and in view of our supply conditions aforementioned, we have decided for the time being NOT to assign a PSB/PSCR representative for each manufacturing site according to the requirements imposed by VW AG.

Customer support

Having said this Witcom and Xunfeng would appreciate any information exchange with customers on special characteristics or other requirements which we would need to secure in our product or during our production. Customers are invited to start a discussion about the special characteristics at the start of any development process or at the start of any commercial relation. Our Quality Assurance and Regulatory Affairs organisation would like to support any end of life discussion and will give required support regulatory discussion about our Witcom and Cawiton grades.