



**珠海巽丰特种塑料有限公司**

A member of Wittenburg Group

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**To Whom It Concerns**

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敬启者

**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**

**参考: Wittenburg 集团被大众 Formel Q 要求获得汽车 IATF 认证和指派产品安全代表 (PSCR/PSB) 的立场**

### **ISO accreditations, Automotive standards**

#### **ISO 认证, 汽车标准**

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.

Witcom Engineering Plastics B.V.和珠海巽丰特种塑料有限公司是 Wittenburg 集团的一部分, 包括位于荷兰 Etten-Leur 的 Witcom Engineering Plastics, 位于荷兰 Zeewolde 的 Wittenburg B.V.和位于中国珠海的珠海巽丰特种塑料有限公司。

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).

Wittenburg 集团的认证包括 ISO9001, ISO14001 和 ISO13485 (医疗应用的 ISO 体系), 同时根据最近主要汽车 OEM 公司的审核, 我们坚信我们符合 IATF 16949 的汽车行业要求 (暂无认证)。

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.

我们了解欧洲 (ECE) 和美国对应的 FMVSS (联邦机动车辆安全标准) 中汽车应用的相关法律法规, 法律信息来源, 制造商的产品责任要求, 召回及其增加的原因, 产品安全和管理体系要求 (包括 ISO9001:2015 和 IATF16949:2016 的差异), 处理特殊特性, 文档和可追溯要求, 以及最后但并非最不重要的 Formel Q 要求的产品安全官的资格, 职责及期望。

### **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.

PSB/PSCR 需要执行的主要任务是防止缺陷 (使用各种工具, 包括 DFMEA, PFMEA, Poka Yoke 等), 实施经验教训, 定义特殊 (关键) 产品和过程特性, 评估潜在故障风险, 评估供应商/分包商变更风险, 制定应急计划, 生产过程中持续确认产品安全等。这些任务和活动目前已经嵌入我们的质量保证组织中。

Wittenburg 作为供应商, 我们不能监督和控制整个供应链, 并且无法在整个寿命周期内监督汽车应用, 因此, 我们无法承担不合理的责任。

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



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any claims imposed on Witcom and Xunfeng 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.

在这方面，必须认识到 **Witcom** 和巽丰受供应条件的法律保护，供应条件在每次报价阶段都会发送给客户。这些供应条件规定，作为销售方 **Witcom** 和巽丰收到的任何索赔不得高于供应商品的价值（第 10.1 条），并且买方最多有 6 个月的时间来评估所供应的商品是否与双方同意的产品规格一致（第 9.1 条）。由于我们无法监督整个供应链，并且鉴于我们之前提到的供应条件，我们暂时决定不根据大众汽车集团的要求为每个生产工厂分配 **PSB/PSCR** 代表。

### Customer support

#### 客户支持

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.

**Witcom** 和巽丰会很感激和客户就特殊特性或者其他我们在产品中或者我们的生产过程中需要确保的其他要求的任何信息交流。邀请客户在任何开发过程的起始阶段或者任何商业关系的初始阶段就特殊特性进行讨论。我们的质量保证和法规事务部门可以支持任何寿命终止的讨论，并提供必要的我们 **Witcom** 和 **Cawtion** 材料的法规交流支持。