

IMDS Newsletter 54

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INTERNATIONAL
MATERIAL DATA
SYSTEM

In this IMDS Newsletter issue you can read about the following:

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|---|--------|
| 1. Declarable substances with unusually low legal thresholds such as PFOA | page 1 |
| 2. SCiP Database Reporting with IMDS Release 13.0 | page 1 |
| 3. SCiP Database Reporting – the view of the IMDS Steering Committee | page 3 |
| 4. Users' Echo - emails sent to IMDS | page 4 |

1. Declarable substances with unusually low legal thresholds such as PFOA

The inclusion of the chemical group perfluorooctanoic acid (PFOA), its salts and PFOA precursor compounds into Annex I of the EU Regulation 2019/1021 Persistent Organic Pollutants (POP-Regulation) intends to eliminate the use of all PFOA related substances in the EU as of July 4, 2020 (past). The POP Regulation is the EU transposition of the UN Stockholm Convention and has replaced the former restriction of PFOA under the Annex XVII of the REACH-Regulation.

The IMDS Steering Committee would like to remind you that the IMDS reporting thresholds vary depending on the substance and / or the legal requirements and is not always at 0.1% w/w. As an example, everyone should be aware the reporting threshold under ELV and per GADSL for Cadmium is 0.01%.

By definition, suppliers are obliged always to consult the Global Automotive Declarable Substance List (www.gadsl.org) to understand the correct substance specific values.

We request you re-confirm compliance of your IMDS data, because for PFOA under POP and now GADSL, the legal threshold is unusually low at 25 parts per billion (ppb), or 0.0000025%.

If necessary, we request you update your IMDS data accordingly and to contact your customers immediately.

2. SCiP Database Reporting with IMDS Release 13.0

It has now been more than a year since the introduction of the SCiP database was announced. However, many of the requirements are just now being transformed into national law and transformed into necessary adaptations of business processes, and ECHA has only recently explained many requirements and approaches to fulfill the legal requirements to the community. One year is a short period of time in the area of material compliance reporting, yet companies and industries must already have solutions to address the requirements as set by the amendment of the Waste Framework Directive (WFD). The WFD Amendment includes aspects beyond prior IMDS supply chain reporting scope, e.g. as used to address ELV and REACH. Some of the most challenging elements of reporting under both SCiP and the national laws were not defined until very recently, and so supply chain reporting requirements could not be identified until now.

The challenges

The **TARIC/CN Code** is the first of these challenges. The “TARif Intégré Communautaire / Combined Nomenclature” is a customs tariff code normally used to classify products for EU taxation. Before now, TARIC has been exclusively related to the Customs domain, and has never been relevant to product chemical substance compliance. How did TARIC suddenly become part of product chemical management? The WFD Amendment tasked the European Chemical Agency (ECHA) to develop the Substances of Concern in Products (SCiP) database. ECHA decided a product classification system was needed to make this database work as intended, so rather than creating a new system, ECHA employed the TARIC code. This decision has resulted in many asking whether the TARIC Code requirement in SCiP reporting constitutes an obligation beyond what is known, needed, or in regulation scope. Even the EU member states are divided on this topic.

Also, it is unclear - yet doubted by many - as to whether this information is of any benefit to waste stream / recycling operators or the informed consumer, which is the supposed driver for the WFD in the first place! Certainly, most large corporations doing business in or with EU clients employ a Customs department familiar with TARIC Codes for their sold products. However, REACH Article 33 requires separate reporting of all discrete parts (articles) containing a REACH Candidate List Substance of Very High Concern (REACH CL SVHC or just SVHC), within a sold assembly (complex object), whether this part is ever sold separately or not. In addition, SCiP now requires a TARIC Code for each of these parts, even though many were never sold separately, and so have never before needed a TARIC Code! Many of these items were/are internal use only, such as IMDS would identify as “modules”, and so may not even previously have had a part number. For companies now obliged to assign TARIC codes to – in some cases - tens of thousands of items which never had TARIC Codes before, this task is monumental. When the product chemical compliance team in a company in this situation must explain it to their management, Customs department, and suppliers - perhaps outside the EU who may not do business in the EU themselves and so may not be familiar with these requirements - in multiple languages, all within a year; the task becomes more than any reasonable organization or industry could achieve without a well-organized, experienced team using an automated, computerized approach and solution.

A second, similar challenge are the **material categories** as introduced by ECHA. It is true that the EU Product Categorization System EUPCS nomenclature is known, and it is also true that the material categories introduced by ECHA are not hard to understand. But as with TARIC Codes, the EUPCS material codes previously have not been an element of product chemical management within IMDS-related product sourcing processes. Typically, IMDS material property updates would either be addressed by the IMDS chemical service or by the respective material providers. However, in this instance, these standard approaches would lead to massive data revision, submission and approval/rejection activities throughout the downstream supply chain, because everyone would now have to understand these new material properties.

The solution

With [Release 13.0](#), IMDS will support creation and submission of SCiP Dossiers based on existing MDS information within IMDS whenever possible, all from within IMDS. With a single mouse click from within IMDS the transfer of MDSs containing SVHCs is done: SCiP numbers are associated with MDSs, and the Dossier(s) are created and loaded into the SCiP database.

A large amount of the information required is already part of IMDS. Primary identifiers (part number), product name, articles (lowest level components), and substances (“concern elements”) can all be translated easily into the respective SCiP Dossier data structures and fields.

Material Categories are addressed as well, as the IMDS Steering Committee has worked hard to establish a mapping between IMDS Material Classifications and ECHA categories. Most substance portions of the SCiP Dossier will be assigned a valid ECHA category, derived from this mapping.



Classification 5.4.1 Polyurethane* 🔍

SCiP Material Category + -

Identifier	Type	Description Levels 1 - 3
66531	Material category	plastic (and polymers) > polyurethanes

TARIC codes are more difficult to assign. While IMDS Release 13.0 will support TARIC Code reporting in MDS communication, it will take a significant amount of time to establish a significant volume of component assemblies (complex objects) and components (articles) with reported TARIC codes. Until then, IMDS will use a default TARIC code for component assembly MDSs, which may be attributed to articles within MDSs. While this does not produce the same data quality one would expect from real, educated supplier data, it mitigates the fact that TARIC codes are not universally known for most individual components, reporting duties start January 5th, and that SCiP reporting is not possible without TARIC codes assigned per article.

The screenshot shows the SCiP reporting interface. It includes the following elements:

- SCP No. (text input field)
- SCP Submission No. (text input field)
- Production in European Union: EU Produced (dropdown menu)
- Taric Code: (with +, -, ? icons)
- Table of Taric Code levels:

Taric Code	Description Level 1	Description Level 2	Description Level 3	Descriptions Levels 4 - 10
8708999790	Vehicles, air...	Vehicles oth...	Parts and ac...	Other parts and accessories > Other > O...
- Safe Use Instructions Required (checkbox)

IMDS will support you with reporting of SCiP-relevant data and submission of Dossiers. While not everything can be automated, most additional SCiP requirements are addressed and resolved with solutions sufficient to address the initial reporting obligations. This will provide us all with the time we need to understand better the new obligations for our products and to perform the high volume of work necessary for us to achieve the high quality data reporting for which the Automotive industry is known and respected.

3. SCiP Database Reporting – the view of the IMDS Steering Committee

It was a mixture of disbelief and astonishment when one day the European manufacturers or importers of articles realized the suddenly arising obligation from the just published revised Waste Framework Directive (WFD) not only to collect SVHC-related data in their products but also to enter them into a government-owned database (SCiP).

Only from the automotive sector up to 25 Million SCiP notifications are expected per year!

This new obligation was mainly aiming at enabling the waste operators to better understand and so recycle their waste streams. In the meanwhile however it became clear that the SCiP database will not be able to fulfill this expectation. That's why also more and more waste operators are opposing against SCiP. Similar to the obligations of Article 33, REACH, one decade ago, the automotive industry however was once more in the unique and compared to other sectors comfortable position to have a robust data source available in IMDS that can be used to fulfill at least parts of the requirements.

ECHA was mandated by the legislators to develop the SCiP Database only within around 15 months. Unfortunately however they did not only transfer the legal text into an IT solution but also largely overinterpreted their legal mandate by inventing mandatory data fields that were not foreseen by the underlying legal requirement of Article 9, WFD. As a result, the IMDS data was incomplete resulting in the large risk of recollection of millions of datasheets throughout international supply chains. A mission impossible, not only because of the current COVID-19 circumstances but also because of the ever shorter remaining time to comply which is **January 5, 2021 when the notification will have to be completed, and not just started as still many believe!**

In order to decrease efforts on the supplier side as much as possible, the IMDS SC has invested into large scale system updates reflecting new data fields as well as an interface which is avoiding suppliers for multiple data processing into different systems. Because some data is not available, it was furthermore agreed to implement several default values that will automatically appear, once a new Component MDSs in Edit Mode is being created.

The IMDS SC however would like to inform about the following rules:

- Depending on the individual applications, the default values provided by IMDS are not necessarily correct in all cases and thus needs to be always checked prior to new MDS submissions.
- For legacy data comprising released own Component MDSs and MDS sub-references of the supply chain (sub suppliers) the new attributes stay unfilled/empty considering data ownership but may be (manually) completed by the customer with these default values.
- System acceptance of data by SCiP does not necessarily mean compliance. In case, enforcement authorities may judge that the default data is incorrect, the data may have to be updated, even years after the MDS was created.

	New MDS	Legacy / Existing MDS
Default Values (DVs)	<ul style="list-style-type: none"> • IMDS will provide DVs for several data fields. • Using these DVs is under the full responsibility of the data owner / MDS creator. 	<ul style="list-style-type: none"> • IMDS will not change / complete existing data with DVs • BUT customer (Tiers & OEMs) may use these DVs in their In-house systems in case that no updated MDSs are provided
Recommendation	<ul style="list-style-type: none"> • Check DVs for correctness • Change DVs as required, before submitting new / updated MDSs 	<ul style="list-style-type: none"> • Check all relevant legacy data • If required, update legacy data (new MDS version!) with other data than DVs

Together with other sectors, the EU Automotive Industry is still very actively advocating towards a more realistic legal requirement. However, as nobody can guarantee the success of these activities it is unfortunately highly recommendable to get prepared for this new legal requirement.

4. Users' Echo - e-mails sent to IMDS

We are seeking support concerning SCiP reporting requirements. The deadline for this is the January 5, 2021. If I read the [Release 13.0](#) announcement correctly, the Release will be rolled out March 10, 2021 - do we have to manually insert data to meet the deadline? Do we need to wait for the Release for automation and is there any license cost associated? Thanks.



Dear IMDS User,

We understand your concerns and are working with urgency and diligence to get automated SCiP reporting available with the upcoming IMDS Release. We are obligated to give IMDS-Advanced Interface (IMDS-AI) solution providers and users a four-month period in which to develop and test their portion of IMDS-AI solutions. So, to hit the planned March 2021 [Release 13.0](#) go-live date, we should have our SCiP reporting solution finalized by the beginning of November 2020. Why is this a challenge? The SCiP System-to-System (S2S) requirements were not finalized until this month, October 2020. We are therefore quite proud to target the Production Release so soon as March 2021.

For data your company and/or suppliers may submit to SCiP via a mechanism other than IMDS prior to IMDS Release 13.0, it will be possible to enter the respective SCiP numbers in IMDS. In this way we allow using the IMDS-to-SCiP interface for future updates of the article or complex object.

The SCiP submission functionality for an MDS in the IMDS Web application is free of charge for the suppliers.

DCX Technology is also working to enhance our existing, familiar and comfortable tools with further analysis and SCiP reporting capabilities such as a bulk upload possibility. If you would like more information about these new possibilities, please contact us via mds-solutions@dcx.com.

Best regards,
Your IMDS Newsletter Team

Your participation

Please help us with your feedback. If you would like to contribute to this Newsletter with articles and comments concerning the IMDS and environmental issues in your company, please contact us by email. For suggestions, further information and questions, please contact imds-newsletter@dxc.com

4. Who to contact at the automobile manufacturers?

Anadolu ISUZU		Mitsubishi	Mitsubishi IMDS
Otomotiv	E. Sener		Coordinator
Aston Martin Lagonda	D. Pearson	Nissan	Y. Bito
BMW	B. Stein-Schaller	Porsche	M. Weck
DAF Trucks	DAF IMDS Coordinator	PSA Group	PSA IMDS Coordinator
Daihatsu	Daihatsu IMDS Coordinator	PT Astra Honda Motor Renault	H. Diansyah Renault IMDS Coordinator
Daimler	V. Ackermann		
e.GO	e.GO Homologations	Renault Samsung	Renault Samsung IMDS Coordinator
Faraday Future	G. Lewis		
FAW-VW	Xin Bao	Royal Enfield	Regulatory Compliance Coordinator
FCA US LLC	Chris Sidney		
Fiat	C. Berruti	SAIC	Yusong He
Ford	S. Riewer	SAIC GM	Helian Qingjun
General Motors	Kirankumar Jagatap	SAIC Volkswagen	Shen Jian
GM India	Kirankumar Jagatap	Scania	Frank Schlüter
GM Korea	Hyunkyung Kim	Ssangyong	Chae-Eun Lee
Hino	HN-Gikan Peis	Motor Company	
Honda	Honda IMDS Coord.	StreetScooter	Philipp Franz
Honda-Sundiro	Akira Iwatake	SUBARU Corp.	SUBARU IMDS Coordinator
Hyundai	T. Unger		
INEOS	INEOS IMDS Coord.	Suzuki	Suzuki IMDS Coord.
Isuzu	Y. Hara	Tata Motors	D. Chandran
Jaguar Land Rover	M. Griffin	Tesla Motors	S. Nagaraj
JSV AVTOVAZ	O. Demicheva	Toyota	I. Schoukens
Karma	K. Shah	UD Trucks	K. Kuwahara
Kubota	Kubota Corp. Quality Ass. Promotion Dpt.	Vinfast LLC Volkswagen	Vinfast IMDS VW IMDS Coordinator
LEVC - London EV Company	IMDS System Engineer	Volvo Car Corporation	I. Rade
Maruti Suzuki India Ltd.	MSIL IMDS Team	Volvo Group	P. Barve
Mazda	Mazda IMDS Support	Wuyang- Honda Motors	Wuyang-Honda IMDS Coordinator

Editorial

The collection of the contents of this IMDS Newsletter is carried out on behalf of the IMDS Steering Committee by Dr. Ilona Herrmann, EntServ Deutschland GmbH, a DXC company.

IMDS Service Center support

Chinese Service Center - imds-helpdesk-china@dxc.com

Monday through Friday, 9:30 a.m. to 12:30 a.m. and 1:30 p.m. to 5 p.m. BST (GMT+8) at +86 027-59180129

English-speaking European Service Center - imds-helpdesk-english@dxc.com

Monday through Friday, 8 a.m. to 4.30 p.m. (GMT+1) at +36 1 778 9821

French-, German-, Italian- and Portuguese-speaking European Service Center - imds-helpdesk-emea@dxc.com

Monday through Friday, 8 a.m. to 4.30 p.m. (GMT+1) at +33 1 57 32 4856 (Italian and Portuguese support only by email)

Japanese Service Center - jpimds-helpdesk@dxc.com

Monday through Friday, 9 a.m. to 5.00 p.m. JST (GMT+9) at +81 3 4530 9270

Korean Service Center - imds-helpdesk@dxc.com

Monday through Friday, 9 a.m. to 5.00 p.m. Seoul (GMT+9) at +82 2 6138 3661

North American Service Center - imds-helpdesk-english@dxc.com

Monday through Friday, 8 a.m. to 6 p.m. (EST) at +1 844 650 4217