

IMDS Newsletter XXXIX

20th April 2015 Issue 1 / 2015 (c) IMDS Steering Committee



INTERNATIONAL
MATERIAL DATA
SYSTEM

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1. REACH Annex XIV Authorization update

The Sunset Date for the following substances passed (21st February, 2015):

Butyl benzyl phthalate (BBP), CAS # 85-68-7
Di-(2-ethylhexyl) phthalate (DEHP), CAS # 117-81-7
Di-n-butyl phthalate (DBP), CAS # 84-74-2
Diisobutyl phthalate (DIBP), CAS # 84-69-5

The Sunset Date for the flame retardant Hexabromocyclododecane (HBCD or HBCDD), CAS #s 3194-55-6, 25637-99-4, 134237-50-6, 134237-51-7, 134237-52-8 passed (21st August, 2015).

What does this mean to me?

If you are importing parts or materials into the EU that contain these substances, you may need to notify the ECHA, according to REACH Article 7.2. If you produce materials or components in the EU that contain these substances, your usage must be covered by a valid authorization. If no authorization for your supply chain usage is granted, then materials containing these substances will not be permitted to be manufactured in the EU (or European Economic Area (EEA)) after the sunset date (21st February 2015 or 21st August 2015).

How do I know if my uses are covered by an authorization?

Decisions on applications for authorization are published on the [ECHA website](#). If your use is authorized, the supplier of the substance or mixture must include the authorization number on the chemical product label.

What uses are not covered by the authorization?

We know that the following uses two are not covered by an authorization relevant for the automotive industry. You will not be permitted to manufacture these materials in the EU / EEA after the sunset date:

- 1) DEHP in rubbers / elastomers
- 2) HBCD / HBCDD in any automotive materials

In these instances, production for materials or parts will need to be done outside the EU / EEA. Otherwise, you will be required to reformulate your materials.

What should I do?

Understand your customer expectations. Many suppliers and OEMs are pursuing substitution of these substances, rather than going through the authorization process. It is important to understand your supplier's strategy. You need to know whether your supplier plans to change the material or apply for authorization.

Am I affected?

Know where your materials are produced. Remember to check your IMDS data, understand if and how you are affected and speak to your customer.

Is there anything else I should be aware of?

Please keep the following in mind:

- Not all applications for authorization will be approved
- Not all substance usages will have an application for authorization; for example, no application for DEHP authorization has been submitted for rubber / elastomer products, so manufacturing of these substances will not be permitted in the EU after Feb 2015.
- If a substance is being substituted, then an update to IMDS must be performed; substitution may also require additional PPAP approval.

2. GADSL Substances Information from IMDS Steering Committee

The **Global Automotive Declarable Substance List (GADSL)** (found on www.gadsl.org) is an industry success story on collaboration and agreement in the automotive supply chain, from OEMs to chemical producers. The objective is to produce one definitive agreed-upon list of declarable substances throughout the industry. This list is updated at least yearly, with the latest release that occurred February 1, 2015.

This latest list includes several amendments and inclusions, so please review this list to understand whether and how you are impacted. If any of the substances identified on GADSL are contained in your materials above the declaration threshold, they must be reported in your IMDS submission.

Since GADSL contains substances that must be legally declared to your customer (e.g. REACH Substances of Very High Concern), material data sheets (MDSs) must be updated and sent to your customer if they are affected by a substance in addition to GADSL.

If you previously marked a substance as "Confidential" in your MDS and this substance is subsequently added to GADSL, then you must update your material information in IMDS and then pass the updated information to your customers. Failure to do so will result in the material being assigned an error flag and it will be unusable by the entire supply chain.

As a reminder, GADSL substances contain the following classifications:

D = Declarable - A substance with this designation must be declared if it exceeds the defined threshold limits.

P = Prohibited - A substance with this designation is either prohibited by regulation for use in certain applications, or may not exceed regulated threshold limits.

The IMDS MDS for the materials must contain all of the actual GADSL substances present in the material, regardless of its GADSL classification.

To enable the smooth flow of IMDS data throughout the supply chain, IMDS records should not be rejected if they contain substances listed as "D" on GADSL.

The ONLY exception to this guidance is if you have a B2B agreement with your supplier that this substance is not acceptable for your organization (in the form of company standards, contracts etc.). Then the data may be rejected.

3. IMDS Release 10.0 enhancements

The IMDS Steering Committee identified the following enhancements to be planned and introduced for IMDS Release 10.0.

1. New Material Checks: Additive Polymers

Most materials should consist of more than one substance, yet it is possible for suppliers to send materials as a single basic substance without specifying additives. With Release 10.0, the Check Procedure will return a warning if a newly created MMDS with one of the classifications 5.x or 6.x consists of 100% of only one substance. This check will be performed for newly created and referenced materials.

2. Agreed Weight Tolerance: Standardized Deviation, Eliminate Tolerance

The IMDS Recommendations definitions of tolerance and deviation have ambiguous and potentially confusing interpretations. Release 10.0 will introduce range-based default values for deviations. Tolerance values will no longer be displayed in the web-application, including legacy data. Warnings will appear if a deviation exceeds the defined default ranges.

Weight of component	Max. deviation in %
0g - 1g	100
1g - 99g	10
100g - 999g	5
1kg - 9.99kg	2
10kg - 99.99kg	1
>100kg	0.5

3. Perceived IMDS Confidentiality Concerns

IMDS supply chain entry masking contains perceived gaps. Suppliers not familiar with the exposed fields copy MMDSs to protect a supplier's identity, thus creating unnecessary MMDSs. The fields concerned are:

- "Supplier Name"
- "Trade name"
- "Remark"

They exist only for MMDSs. Release 10.0 will incorporate the following change: For MMDS "Supplier Name" and "Trade name" the existing IMDS supply chain confidentiality mechanism will be used to hide or disclose information: These fields shall be visible if you own, have received/accepted the MMDS or it is published. To the entry field, "Remark" explanatory text will be added to indicate it remains visible.

4. Published Material MDS Quality – Approval form for MMDS creators and MMDS Creation Checks

- Not all MMDS creators have the knowledge to create correct MMDSs. Therefore, with Release 10.0, a formal self-certification "May publish" process and qualification will be introduced. To obtain the "Publish" qualification, users must confirm reading, understanding and following the IMDS Recommendations. This will be controlled and confirmed annually by IMDS Company Administrators. The MMDS may only be published if the user is self-certified and confirmed by one of their IMDS Company Administrators.
- To improve the quality of published MMDSs, published MMDSs need to be Error- and Warning-free (i.e. an MMDS containing Warnings cannot be published). Searches for standards-based published MMDSs (e.g. IMDS Committee) remain the same. Searches for other published MMDSs will default to finding only Error- and Warning-free MMDSs (with capability to override for critical legacy MMDSs).

5. Polymeric Parts Marking

For the existing polymeric parts marking checks that need to be reworked to support the relevant regulations: The 25g check will be removed, the classifications 5.4.x and 5.5.x will be added to the 100g check, and the 5.2 classification will be added to the 200g check.

6. Development Sample Report Changes

The wording "Development Sample Report" is confusing. Suppliers erroneously believe they should select this option when performing a sampling process. Change "Development Sample Report" to "Preliminary MDS". A Warning text next to the check box explaining "If you tick the box, this MDS will be a preliminary version. You will need to send later a final version."

7. Organization Units Search Function

The Administration >> User >> Create New User screen does not provide search capability

for Org Units during assignment. On the Administration >> User >> Create New User screen, the capability to search and specify Org Units for the newly-created user will be provided.

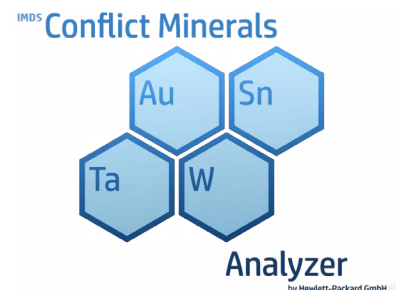
8. Biocide Regulations Enhancements

Requesting Biocide Product Information at the MMDS level can seriously impact the entire MDS flow throughout the supply chain. Therefore, it is necessary to have a way to report Biocide information from substance suppliers through to OEMs without completely disrupting the existing MDS flow. A new approach, identified as the "IMDS Chemistry Manager", is being explored to address aspects of Biocides, REACH, and other regulations. The IMDS Steering Committee has appointed a working group to elaborate the specifications of the Chemistry Manager. The current plan is to include the Chemistry Manager with IMDS Release 10.0, possibly after other enhancements are completed.

IMDS Release 10.0 is planned for the last quarter in 2015 after introducing the enhancements to all IMDS AI Licensees and OEMs prior to testing. The release date is still fluid and subject to changes depending on the implementation of the Chemistry Manager module. We will keep you informed on the exact dates for IMDS Release 10.0 once they are defined.

4. New tools around IMDS - IMDS Conflict Minerals Analyzer

HP's new **IMDS CM Analyzer** will help the IMDS user community understand and analyze for **US Conflict Minerals Act legislation**. It provides IMDS users with a fast and easy way to examine their suppliers' existing material data sheets (MDSs) and **locate conflict minerals within their products**. IMDS users can then choose to have these results sent to the Compliance Data Exchange (CDX), and have **CDX automatically produce and email requests** to these suppliers asking to **submit a Conflict Mineral Declaration in CDX**. These new capabilities facilitate compliance by streamlining the conflict mineral location, identification, and feedback request processes, thus automating all possible operations in a straightforward fashion, and throughout the entire supply chain.



Users with valid credentials in both IMDS and CDX can use the IMDS CM Analyzer for free. IMDS Users with a valid IMDS-a2 license can use the IMDS CM Analyzer functions in the IMDS-a2 application.

We will offer a free Webinar (in English) to introduce the IMDS CM Analyzer to you:

05th May 2015 15:00h-16:00h (UTC+2) - [Register here](#)

Bookmark [our IMDS CM Analyzer Webpage](#) for more and regular information.

5. New tools around IMDS - Compliance Checker

CoChecks using IMDS-a2: An HP Service in Collaboration with tec4U-Solutions

The [IMDS-a2 CoChecker module](#) extracts the content of selected material data sheets (MDSs) directly from the IMDS and saves them as XML files on your PC. IMDS-a2 users can easily extract one or more components for the checks and simply pass the prepared data to tec4U's CoChecker software. The CoChecker software checks against the specified conformity requirements based on your IMDS data. The result is a certificate of compliance with given specifications. This helps you ensure material compliance with less time and effort by your employees, and trust in your products by your customers.

Free 30-Day Trial: [Try the IMDS-a2 functionality](#), including the CoChecker module with our Trial Version for 30 days, free of charge (without REACH module). During the evaluation period, each IMDS company will be able to generate up to five MDS extracts for no extra charge.

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@hp.com

5. Who to contact at the automobile manufacturers?

Anadolu ISUZU		Renault	Renault IMDS
Otomotiv	E. Sener		Coordinator
Aston Martin Lagonda	D. Pearson	Renault Samsung	Renault Samsung
BMW	Dr. K. Oldenburg-Nazaruk	SAIC	IMDS Coordinator
Chrysler LLC	Chris Sidney	Scania	Yusong He
Daimler	V. Ackermann	Shanghai GM	Frank Schlüter
FAW-VW	Xin Bao	Shanghai	Shanshan Feng
Fiat	K. Zardo	Volkswagen	Shen Jian
Ford	S. Riewer	Ssangyong	Kyong Soo Kim
Fuji Heavy Industries	SUBARU IMDS	Motor Company	
	Coordinator	Suzuki	Suzuki IMDS
General Motors	Anne Grützner		Coordinator
GM India	Kirankumar Jagatap	Tata Motors	M. Hatwalne
GM Korea	Raeshil Gang	Tesla Motors	E. Shen
Honda	Honda IMDS	Toyota	E. Hoffmann
	Coordinator	UD Trucks	K. Kuwahara
Honda-Sundiro	Akira Iwatake	Volkswagen	VW IMDS
Hyundai	T. Unger		Coordinator
Isuzu	T. Koreeda	Volvo Car	
Jaguar Land Rover	M. Griffin	Corporation	I. Rade
Mazda	T. Tomita	Volvo Group	Volvo Group IMDS
Mitsubishi	T. Isogai		Coordinator
Nissan	H. Okuyama	Wuyang-	Wuyang-Honda
Porsche	H. Ampferer	Honda Motors	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, Hewlett-Packard GmbH



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