

IMDS Newsletter 45

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INTERNATIONAL
MATERIAL DATA
SYSTEM

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1. IMDS Chemistry Manager - what is this about?

What is IMDS Chemistry Manager and why is it needed?

Initially, the End-of-Life Vehicle (ELV) directive was the only legislation that IMDS was designed to address, and it was simple to select the application codes for a specific substance. Other regulations have since been introduced and are now supported in IMDS' Chemistry Manager:

- Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulations has its permissible uses, permissible regions and different REACH versions in different areas.
- Biocidal Product Regulation (BPR) substances have product types and active substances that are permitted for some product types but not others. There is also an additional consideration of why a specific chemical was added to a material (for example: if the usage is biocidal, BPR regulation applies, otherwise the usage is permitted).

The new IMDS Chemistry Manager functionality allows companies to provide REACH Annex XIV Regulatory information and Biocide Product Regulation (BPR) information which becomes instantaneously visible to all levels of the supply chain. This should reduce the work needed through the supply chain to manage regulatory information, and reduce response time compared to MDS revision and cascading. A link is maintained between the added regulatory information and the related MDSs. IMDS Chemistry Manager also provides a framework for support of new regulations in the future.

Are there consequences if the regulation questions are not answered?

The importance of regulation wizard information will vary depending on the product, its market, the substances involved, the amount the customer imports, etc. In some cases the OEM may not be able to import or sell their vehicle without some of the information in IMDS Chemistry Manager, so in those cases, it will be very important. If information is missing, the IMDS Chemistry Manager will enable the OEM to request missing information.

Will I need IMDS Chemistry Manager if I do not produce products in the EU?

Often, a downstream or end customer will not know where a specific material or component is produced. If a product contains regulatory relevant substances, these clients are likely to request regulatory information in IMDS Chemistry Manager. If your company receives a request for regulatory information even though its product is not produced or, to your knowledge imported, into the EU, material supplier will need to use the IMDS Chemistry Manager function and answer No to the EEA produced and EU imported question. If your company manufactures a product outside the EU and is not aware it gets imported into the EU, regulatory information will still need to be provided. The importer would need to complete the component regulatory information in the regulation wizard and report that the item is imported. This will inform the material manufacturer that the component is imported into the EU and that material regulatory information is needed.

Are Chemistry Manager entries checked for accuracy?

Companies at every level of the supply chain will use the information in IMDS Chemistry Manager to meet their regulatory reporting requirements. In some cases, REACH and BPR information is required for import or sale of products into the EEA. IMDS Chemistry Manager information is not accepted and rejected as are MDS entries, yet companies are likely to escalate issues if accurate information is not provided via IMDS Chemistry Manager when it impacts their ability to comply with the relevant regulations.

These questions and many others are answered in the [FAQ section](#) of our IMDS Information pages. Both, the questions and answers are available in English, German, Japanese, Korean and Chinese.

2. Regulatory information

1. - Decabrominated Diphenyl ether (DecaBDE) is a common brominated flame retardant, which has recently been identified as a Persistent Organic Pollutant (POP) and will be most likely added to the UN Stockholm Convention in May 2017 including an exemption for Automotive Legacy Spare Parts.

It is also subject to a REACH Annex XVII Restriction, which prohibits the manufacture, use and placing on the market mixtures and articles that contain DecaBDE as of 2 March 2019.

[\[See ACEA position Paper on DecaBDE\]](#)

2. - Perfluorooctanoic acid and its salts (PFOA / PFOx) are commonly used in fluoropolymers and anti-stain treatments. These substances have been identified as Persistent, Bioaccumulative and Toxic (PBT) that can have severe and irreversible effects on the environment and human health.

They are also subject to a draft REACH Annex XVII Restriction, which prohibits the manufacture, use and placing on the market mixtures and articles that contain these substances above 25ppb as of 2020. In addition, a decision to evaluate PFOA under the UN Stockholm Convention will be taken in May 2017 which may lead to a global ban of the substance.

[\[See ACEA position Paper on PFOA\]](#)

3. Biocidal Products Regulation

The automotive Task Force-Biocides, has published the Automotive Industry Guideline on the Biocidal Products Regulation (AIG-BPR) as a standardized industry-wide approach to BPR compliance. It is a practical guide that includes clear step-by-step compliance actions.

The AIG-BPR is available for download [[see ACEA BPR AIG](#)]

In order to improve understanding within the industry, all automotive suppliers and vehicle manufacturers are encouraged to send any examples of automotive biocidal products or treated articles to your relevant trade association, or to bpr@acea.be.

4. REACH registration – 2018 Deadline

The Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation (EC) 1907/2006, requires that manufacturers and importers of substances in the EU, register the substances for their intended use.

The final REACH registration deadline of 31 May 2018 is for substances manufactured in, or imported into, the EU at 1 to 100 tons per year.

To ensure business continuity, it is important that all chemicals used in the automobile industry are registered.

Please see the [ACEA REACH Registration Position Paper](#), and also cascade this requirement throughout your supply chain.

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

Recently I was looking for IMDS training on the internet. What I found, were many seminars by many training companies. How can I find out, which one I should book in my country? Thanks for your help in advance.



Dear IMDS User,

The following options for choosing IMDS Training exist:

1. All [HPE-certified training partners](#) can be found on our web pages. These are the preferred option when looking for IMDS seminars. On the [Registration](#) page (see below) you can register for one of their trainings online. They use the IMDS Training environment which is in accordance with the [IMDS Terms of Use](#).
2. There are also companies using the IMDS Training environment for their seminars without being HPE-certified. In such cases, you get a UserID for the IMDS Training environment for one month to try out IMDS use. These companies comply with the [IMDS Terms of Use](#).
3. There really is no third option... whenever you come across IMDS seminars, please make sure, the IMDS Training environment is used. **Seminars using the IMDS Production server must in no case be chosen**, because using the productive IMDS environment for training is prohibited and a violation of the IMDS Terms of Use.

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@hpe.com

6. Who to contact at the automobile manufacturers?

Anadolu ISUZU		Mitsubishi	Mitsubishi IMDS
Otomotiv	E. Sener		Coordinator
Aston Martin Lagonda	D. Pearson	NEVS	M. Axsater
BMW	Dr. K. Oldenburg-Nazaruk	Nissan	N. Hattori
		Porsche	M. Weck
DAF Trucks	DAF IMDS	Renault	Renault IMDS
	Coordinator		Coordinator
Daihatsu	Daihatsu IMDS	Renault Samsung	Renault Samsung
	Coordinator		IMDS Coordinator
Daimler	V. Ackermann	SAIC	Yusong He
FAW-VW	Xin Bao	SAIC GM	Helian Qingjun
FCA US LLC	Chris Sidney	SAIC Volkswagen	Shen Jian
Fiat	K. Zardo	Scania	Frank Schlüter
Ford	S. Riewer	Ssangyong	Chae-Eun Lee
Fuji Heavy Industries	SUBARU IMDS	Motor Company	
	Coordinator	StreetScooter	Philipp Franz
General Motors	Anne Grütznier	Suzuki	Suzuki IMDS
GM India	Kirankumar Jagatap		Coordinator
GM Korea	Hyunkyung Kim	Tata Motors	M. Hatwalne
Hino	HN-Gikan Peis	Tesla Motors	S. Nagaraj
Honda	Honda IMDS	Toyota	V. Aubert
	Coordinator	UD Trucks	K. Kuwahara
Honda-Sundiro	Akira Iwatake	Volkswagen	VW IMDS
Hyundai	T. Unger		Coordinator
Isuzu	Y. Hara	Volvo Car	
Jaguar Land Rover	M. Griffin	Corporation	I. Rade
JSV AVTOVAZ	O. Demicheva	Volvo Group	Volvo Group IMDS
Karma	G. Lewis		Coordinator
Kubota	Kubota Corp. Quality	Wuyang-	Wuyang-Honda
	Ass. Promotion Dpt.	Honda Motors	IMDS Coordinator
Mazda	T. Tomita		

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.

 **Hewlett Packard Enterprise**

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