IMDS Newsletter 62

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INTERNATIONAL MATERIAL DATA SYSTEM

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1. IMDS Release 14.2

IMDS Release 14.2 went online 15th November 2023 and contains the following changes:

New search parameter "valid MDSs" if searching for published MDSs

Since Release 14 MDSs older than ten years issue warnings and errors. Many users have built their MDSs with published MDSs older than ten years and only get an error when the MDS is done and shall be released. Therefore, a new search parameter will be introduced when searching published MDSs, to only search for valid MDSs. This parameter will be set by default. If searching for valid MDSs, you will only find MDSs that are either published by a Standard Company, younger than ten years or materials that are marked as still valid.

Allowing high concentration of gold in classification 7.2

In the beginning of 2023, the group "Chk: Classification 1-4 w/o silver" was introduced, to allow glasses with more than 80% silver in classification 7.2. With Release 14.2 the group will be renamed to "Chk: Classification 1-4 w/o silver, gold" and gold will be taken out of that group. By doing this, it will also be possible to create glasses with more than 80% gold in classification 7.2 without getting a warning. Despite the renaming and removing gold from the group, no other changes are done.

Ignore Pre-Release 14.0 materials with "Filler (dual use)" substances in the check for filled Thermoplasts

With IMDS Release 14.0 a new check was introduced to check that classification 5.1.a – Filled Thermoplasts have at least 5% filler substances. As some substances can be used as a filler and for other purposes, an additional substance group "Filler (dual use)" has been introduced. Substances from that list have to be marked whether they are used as a filler in classification 5.1.a. If they are not marked, they may issue a warning. Pre-Release 14.0 materials do not have this information, these MDSs started issuing warnings and led to a lot of rejections within the supply chain. With IMDS Release 14.2 the check will be amended to assume that substances of the list "Filler (dual use)" have been used as a filler in pre-Release 14.0 materials, reducing the warnings dramatically.

2. Planned implementation of ISO 1043-3/-4 in the IMDS Basic Substance List

Polymeric parts marking requirements in China, identified in GB/T 19515 “Road Vehicles Recyclability and Recoverability Rate”, require polymeric parts greater than 100g that contain plasticizers or flame retardants, to be marked in accordance with ISO 1043 parts 3 & 4.

Some pseudo substances available in IMDS do not allow the correct identification of the required polymeric marking requirement and therefore, they will be hidden in IMDS.

New, more descriptive pseudo substances that meet the requirements of ISO 1043 parts 3 & 4, have been added.

To summarize the actions, the following pseudo substances have been hidden in IMDS:

Adipate plasticizer ISO 1043-3, not declarable
Azelate plasticizer ISO 1043-3, not declarable
Dibenzoate plasticizer ISO 1043-3, not declarable
Furmarate plasticizer ISO 1043-3, not declarable
Maleate plasticizer ISO 1043-3, not declarable
o-acetylcitrate plasticizer ISO 1043-3, not declarable
Phosphate plasticizer ISO 1043-3, not declarable
Phthalate plasticizer ISO 1043-3, not declarable
Polymeric plasticizer ISO 1043-3, not declarable
Sebacate plasticizer ISO 1043-3, not declarable
Trimellitate plasticizer ISO 1043-3, not declarable

Halogenated compound ISO 1043-4, not declarable
Organic phosphorus compound ISO 1043-4, not declarable
Inorganic phosphorus compound ISO 1043-4, not declarable
Metal oxide, hydroxide or salt ISO 1043-4, not declarable
Boron or zinc compound ISO 1043-4, not declarable
Silica compound ISO 1043-4, not declarable
aliphatic fluorinated compounds, ISO 1043-4, not declarable

22 new flame retardant pseudo substances, referring to the specific FR code will be added. These can only be used where the flame retardant substance is not listed in GADSL:

ISO 1043-4 FR(10) aliphatic/alicyclic chlorinated compounds, not declarable
ISO 1043-4 FR(11) aliphatic/alicyclic chlorinated compounds in combination with antimony compounds, not declarable
ISO 1043-4 FR(12) aromatic chlorinated compounds, not declarable
ISO 1043-4 FR(13) aromatic chlorinated compounds in combination with antimony compounds, not declarable
ISO 1043-4 FR(14) aliphatic/alicyclic brominated compounds (excluding hexabromocyclododecane), not declarable
ISO 1043-4 FR(15) aliphatic/alicyclic brominated compounds (excluding hexabromocyclododecane) in combination with antimony compounds, not declarable
ISO 1043-4 FR(16) aromatic brominated compounds (excluding brominated diphenyl ether and biphenyls), not declarable
ISO 1043-4 FR(17) aromatic brominated compounds (excluding brominated diphenyl ether and biphenyls) in combination with antimony compounds, not declarable
ISO 1043-4 FR(22) aliphatic/alicyclic chlorinated and brominated compounds, not declarable
ISO 1043-4 FR(26) aliphatically brominated block copolymer or that containing antimony compounds, not declarable
ISO 1043-4 FR(27) brominated bisphenol alkyl ether or that containing antimony compounds, not declarable
ISO 1043-4 FR(40) halogen-free organic phosphorus compounds, not declarable
ISO 1043-4 FR(41) chlorinated organic phosphorus compounds, not declarable
ISO 1043-4 FR(42) brominated organic phosphorus compounds, not declarable
ISO 1043-4 FR(50) ammonium orthophosphates, not declarable
ISO 1043-4 FR(51) ammonium polyphosphates, not declarable
ISO 1043-4 FR(53) hypophosphites, not declarable
ISO 1043-4 FR(54) organic ammonium phosphate, not declarable
ISO 1043-4 FR(55) organic ammonium polyphosphate, not declarable
ISO 1043-4 FR(73) organic zinc compounds, not declarable
ISO 1043-4 FR(75) inorganic silicon compounds, not declarable
ISO 1043-4 FR(76) organic silicon compounds (silicones), not declarable

3. Non-standardized MDSs published by IMDS Committee to be hidden

Please note that during the next months MDSs published by the IMDS Committee, whose ingredients are not defined in a standard, will be hidden in IMDS.

These hidden MDSs can no longer be found and referenced in new MDSs. Nevertheless, the use of received MDSs referencing these hidden MDSs will still be possible.

The reason for hiding the MDSs is that the IMDS Steering Committee is responsible for all its published datasheets and encourages IMDS users to use standard materials. However, this means that users no longer ask their suppliers for information about some MDSs and instead use standard materials directly. This can result in poor quality data as the MDSs do not always match the product, which may lead to non-compliance with regulations.

The hiding of MDSs impacts some metals, surface treatments, some semi-finished products and labels. The exact date of hiding these MDSs will be announced in the IMDS approximately one month in advance.

4. Reporting of Electric/Electronic (E/E) components and assemblies

Background

In 2021, the material classifications 8.x previously used for reporting electronics were deactivated. The purpose is to comply with EU waste framework directive (WFD) introduced in January 2021. Since then, it has not been possible to create the new Material MDSs using 8.x classifications. IMDS Recommendation 019 was updated to provide directions on how to report electronics by using more accurate material classifications, to reflect the actual material composition.

Given the complexity of implementing this transition across the entire supply chain, no warning or error message when referencing a material with classification 8.x has been implemented in the IMDS system yet.

SCIP reporting

SCIP reporting requires accurate classification of materials. These materials should be reported by identifying the individual basic materials that make up part of their composition using the material categories and subcategories by ECHA.

Materials with material classification 8.x are mapped towards the category 11 “Other” in SCIP. This category should only include materials that cannot be identified or described by using the other categories in SCIP. From a technical point of view, it is fully possible to report this way, but from a legal point of view it is not sufficient. The new way of reporting electronics in IMDS (described in IMDS Recommendation 019) supports a more accurate way of classifying the materials into the correct category which also leads to a better material classification when reporting in SCIP.

GADSL

Since classification 8.x deactivation, the universal PFAS (polyfluorinated alkyl substances) restriction has been proposed by ECHA, and GADSL has grown by several thousand substances. Evaluating the sector responses to the universal PFAS restriction, electronics are heavily impacted to a greater extent than they are reported in IMDS, so we believe that data sheets using material classification of 8.x no longer fulfil the GADSL declaration requirements. We are therefore required to accelerate the transition away from 8.x materials in the supply chain.

Going forward

To accelerate the transition away from materials under 8.x in the supply chain, a two-step approach is adopted:

1. A Warning will be activated if your MDS references a material with classification 8.x. This will go into production in IMDS release 14.4, later in 2024.

2. An error will be shown if your MDS refences a material with classification 8.x. The production implementation date is not yet defined.

Please note, that even though the IMDS system allows sending data sheets containing materials with 8.x classifications, recipients are well within their rights to reject these materials. Suppliers are urged to move away from using materials with 8.x classification as soon as possible, to minimize any disruption with their PPAP requirements.

Misuse of other material classifications

We have seen cases where other material classifications (e. g. classification 7.3) have been misused for reporting electronic and electric materials after the 8.x classifications were deactivated. We would like to emphasize the importance of reporting IMDS using correct material classification, hence we refer to IMDS Recommendation 019, which describes how to report electric/electronic components and assemblies.

The current REC019 supports and helps the supply chain in the versioning of the MMDSs in the right choice of material classification.

5. Use of the SCIP function in IMDS

From 05 January 2021, Article 9.1 of European Waste Framework Directive (Directive (EU) 2018/851) set up a new legal “Substances of Concern in Products” (SCIP) requirement consisting in reporting to European Chemicals Agency (ECHA) any article/complex object containing REACH Candidate List according REACH Article 33 requirement. This legal duty is applicable to any supplier of article/complex object in the European Union delivering them to professional customers.

In this context, ECHA has been mandated to develop a dedicated “Substances of Concern in Products” (SCIP) IT infrastructure to collect and to make available the data required to waste operators and consumers. This ECHA IT infrastructure has been implemented and SCIP ECHA DB (Data Base) is now used by different sectors to provide the required information.

The following suppliers of articles need to provide information to ECHA:

- EU producers and assemblers,
- EU importers,
- EU distributors of articles and other actors who place articles on the market.

Retailers and other supply chain actors supplying articles directly to consumers are not covered by the obligation to provide information to ECHA.

Considering our automotive supply chain, this means that any automotive supply chain actor (from the supplier of smallest components to carmakers) delivering article/complex object in European Union* has the duty to comply with SCIP notification unless the article/complex object is only intended to consumers.

(*) Following the incorporation of the WFD in the European Economic Area (EEA) Agreement, the Commission confirms that SCIP notifications can now also be submitted by EEA country duty holders.
From 7 November, the SCIP database is ready to receive their notifications.
European Economic Area (EEA): Iceland, Liechtenstein and Norway.

6. Users’ Echo - e-mails sent to IMDS

We are a small supplier company in the automobile supply chain. Whenever we pass on data it takes us a long time, because we need to create a copy of what the supplier sends to us to not reveal which supplier we are working with – is there any other way of doing this? This would be good to know. Thanks.

Dear IMDS User,

One of the topics, the IMDS Steering Committee often discusses is Data Quality in IMDS, especially with the focus on creating unnecessary copies of MDSs.

From time to time, the Helpdesks report cases, that IMDS users create copies – either using the IMDS copy function or also in creating a new MDS from scratch. In many cases this is done because the users do not want their customers to know where the MDS is originally coming from, i. e. who the (MDS) suppliers are.

The Supply Chain Confidentiality concept in IMDS prevents these data from being revealed: If MDSs from suppliers are referenced, the customer can never see, where the MDS originates from – unless it is a published MDS and therefore accessible to all.

So, please do NOT create copies of the MDSs sent to you - your customer never sees the supplier’s or supplier’s supplier name in the referenced datasheets in the tree but only your name as the name of the directly supplying company.

Best regards,

Your IMDS Newsletter Team

7. Who should be contacted at the automobile manufacturers?

Anadolu ISUZU Otomotiv	E. Sener
Aston Martin Lagonda	D. Walker
BMW	B. Stein-Schaller
Canoo	Craig Howard
DAF Trucks	DAF IMDS Coordinator
Daihatsu	Daihatsu IMDS Coordinator
Daimler	V. Ackermann
Daimler Truck AG	T. Fischer
Dongfeng Honda	Zhengyuan Zeng
e.GO	e.GO Homologations
Faraday Future	G. Lewis
FAW-VW	Aiming Li
FCA US LLC	Chris Sidney
Fiat	C. Berruti
Fisker Inc	C. Munoz
Ford	S. Riewer
GAC Honda	H. Yinbin
General Motors	Kirankumar Jagatap
GM India	Kirankumar Jagatap
GM Korea	Hyunkyung Kim
Hino	HN-Gikan Peis
Honda	Honda IMDS Coord.
Honda-Sundiro	Akira Iwatake
Hyundai	T. Unger
INEOS	INEOS IMDS Coord.
Isuzu	Isuzu IMDS Coord.
Jaguar Land Rover	M. Griffin
JSV AVTOVAZ	O. Demicheva
Karma	K. Shah
KTM	Wan-Ting Hsiao
Kubota	Kubota Corp. Quality Ass. Promotion Dpt.
LEVC - London EV Company	IMDS System Engineer
Maruti Suzuki India Ltd.	MSIL IMDS Team
Mazda	Mazda IMDS Support
Mitsubishi	Mitsubishi IMDS Coordinator
Nissan	Y. Bito
Polestar	IMDS Coordinator
Porsche	M. Weck
PSA Group	PSA IMDS Coordinator
PT Astra Honda Motor	H. Diansyah
Renault	Renault IMDS Coordinator
Renault Samsung	Renault Samsung IMDS Coordinator
Royal Enfield	Regulatory Compliance Coordinator
SAIC	Yusong He
SAIC GM	Guanghong Xia
SAIC Volkswagen	Shen Jian
Scania	Frank Schlüter
Smart	James Liu
Ssangyong Motor Company	Chae-Eun Lee
StreetScooter Engineering	IMDS Coordinator
SUBARU Corp.	SUBARU IMDS Coordinator
Suzuki	Suzuki IMDS Coord.
Tata Motors	D. Chandran
Tesla Motors	S. Nagaraj
Toyota	I. Schoukens
TVS Motor	Arun N.
UD Trucks	K. Kuwahara
Vinfast LLC	Vinfast IMDS
Volkswagen	VW IMDS Coordinator
Volkswagen Group of America, Inc.	IMDS Coordinator
Volkswagen (Anhui) Automotive Company Ltd.	Rongyao Liu
Volvo Car Corporation	IMDS Coordinator
Volvo Group	P. Barve
Wuyang-Honda Motors	Wuyang-Honda IMDS Coordinator

Editorial

The content in this IMDS Newsletter is collected on behalf of the IMDS Steering Committee by Dr. Ilona Herrmann, EntServ Deutschland GmbH, a DXC company.

DXC TECHNOLOGY

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)

IMDS Global Service Center supporting English language - imds-helpdesk-emea@dxc.com
Monday through Friday, 8 am to 12 pm CET (UTC-6)
Monday through Friday, 1 am to 5 pm CST (UTC+1)
phone: (+33) 1 57 32 4856 or (+36) 1 778 9821 or (+1) 844 650 4217

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

Korean Service Center - imdsk-helpdesk@dxc.com
Monday through Friday, 9 a.m. to 5.00 p.m. Seoul (GMT+9) at +82 2 6138 3661