

IMDS Newsletter 61

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INTERNATIONAL
MATERIAL DATA
SYSTEM

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1. New Recommendation IMDS 025 - Evaluate the recycled and bio-based content of materials

The background and purpose of this new recommendation aligned with the IMDS Release 14.0 related enhancements for recycled and bio-based content of materials have been described in the **introduction of the recommendation** as follows:

In the EU Green Deal framework, circular economy and resource efficiency have been identified as key contributors to achieving climate neutrality by 2050 and decouple economic growth from resource use.

To fulfil this ambition the EU needs to reduce its consumption footprint and increase its circular material use rate in the coming decade.

In this context, the EU Commission has developed the CEAP (Circular Economy Action Plan) which presents a set of interrelated initiatives to establish a strong and coherent product policy framework. The CEAP is triggering, amongst other initiatives, the review of ELV directive, the proposal of a new regulatory framework for batteries, the Eco-design for Sustainable Products Regulation (ESPR) or the definition of mandatory requirements for recycled plastic content including bio-based content.

Among others, these mentioned initiatives will require an uptake of recycled or bio-based content as well as the reporting thereof.

In addition to the mentioned EU framework, France has implemented a national legislation (Law N°2020-105 of 10 February 2020) to fight waste and promote circular economy. This new legal national obligation will enter into force by 1 January 2024 for the vehicles categories M1 and N1 and will require importers and/or producers to communicate on environmental performances including recycled content.

To address these upcoming obligations, the IMDS Steering Committee has decided to enhance the already existing functionality to facilitate and enable the communication of recycled and bio-based content in materials and (semi-) components throughout supply chains. While IMDS Release 14 will provide the infrastructure to report and store the corresponding data from supply chains, it however it does not describe how the values are to be calculated.

This recommendation aims at closing this gap while ensuring data consistency and reliability by providing

- the terminology to be used by the stakeholders and*
- common methodology for defining and calculating recycled and bio-based content*

If deemed feasible, additional adaptations of the IMDS reporting system will be done when existing legal requirements are updated and new ones will be introduced in the future.

Deviations from this recommendation might be agreed between partners as long as they are not in direct contradiction with the present document.

If needed, OEM specific requirements must be taken into consideration for further specific explanation and clearer guidance in terms of reporting.

Nevertheless, there may be additional customer-specific requirements that cannot be harmonized. Customer-specific IMDS requirements are published in the respective customer specifications.

This recommendation has been elaborated and agreed by a working group of representatives and experts from the IMDS Steering Committee and the Supplier Associations (AIAG, CLEPA, JAPIA). It will get effective with the IMDS Release 14.0 production rollout planned for May 10, 2023 and is located like all IMDS Recommendations in the IMDS web application under the menu item Help-Recommendation.

2. IMDS Release 14.1 ahead

Shortly after [IMDS Release 14.0](#) the next Release 14.1 will be rolled out. It will contain the following changes:

1. Default selection of an Org.-Unit in newly created MDSs

Users assigned to one or more Org.-Units within their company can select which Org.-Unit an MDS belongs to in the “Supplier Data” tab of an MDS’s details. This can be an easy to forget step and MDSs might be accidentally assigned to the root company instead of the correct Org.-Unit. To avoid this situation, especially for users who are only assigned to a single Org.-Unit, IMDS will remember which Org.-Unit the user has used the last time and use it as default for all newly created MDSs.

2. Rejection reason in Inbox/Outbox search results

For sent/received MDSs in either the “rejected” or the “modified” state, the rejection reason will be displayed in the search result of the MDS Inbox and Outbox. Since most rejection reason are too long to be displayed within the search result, the new column will only contain a shortened text, cut off at a certain length. However, when exporting the search result as an Excel sheet, the full rejection reason will be included.

3. Allow search for SCIP Material Category by ID

To allow the search for SCIP Material Categories by ID, a new search field will be added to the dialog for assigning a category to a material. This field will work similarly to the Taric Code search field in the dialog for assigning SCIP Article Categories to components.

4. Error for editable references to hidden data

Inactive substance, standard materials or application codes in IMDS are either “deactivated” or “hidden”. In both cases, they cannot be found or assigned in new MDSs, but while deactivated data will result in either warnings or error messages in the check, no messages are shown for references to hidden data. This allows the continued use of hidden data in existing MDSs, but prevents them from being referenced in new MDSs. When creating a new version or a copy of an MDS referencing hidden data, the check currently also does not show any message. This means that by versioning or copying new MDSs can be created which reference hidden data that should not be used anymore in new MDSs.

To avoid this, an error message will be shown whenever hidden data is referenced in editable MDSs. Users will have to replace the reference with a valid one before releasing the MDS.

5. Error for deactivated application codes

To prevent the usage of deactivated applications codes, the severity of the check message for deactivated application codes within referenced components will be increased from warning to error.

Like the warning message before, this error will not appear when sending/proposing legacy spare parts.

6. Proposing MDSs with deactivated contact

A deactivated contact person assigned to an MDS currently results in an error message in the check making it sometimes impossible to send propose old datasheets without creating a new version.

This will be changed so that no check message will appear if the proposing company has a valid default contact which can be displayed instead of the original deactivated contact.

5. Splitting of application code 5(b) into 5(b)(i) and 5(b)(ii)

To reflect the new ELV Annex II (EU) 2023/544, the application code “5(b) - Lead in batteries for battery applications not included in entry 5(a)” will be deactivated and the following two application codes, which are both valid for the same substances, classifications and thresholds, will be added:

- 5(b)(i) - Lead in batteries
 - (1) used in 12 V applications
 - (2) used in 24 V applications in special purpose vehicles as defined in Article 3 of Regulation (EU) 2018/858 of the European Parliament and of the Council
- 5(b)(ii) - Lead in batteries for battery applications not included in entry 5(a) and entry 5(b)(i)

3. Global PFAS Chemical Regulations and Required IMDS Actions

Per- and polyfluoroalkyl substances (PFAS) are a broad class of different chemicals receiving increased public attention. Due to its unique and high-performance properties and limited alternatives this diverse family of over 10,000 chemical substances (which includes fluoropolymers and fluoroelastomers) is used throughout the automotive industry across a broad range of applications. Automotive applications that use PFAS are especially used in future technologies required for the intended decarbonization of the transport sector. They include high-performance electronics, high-voltage traction batteries, fuel cells, fuel and brake hoses, air conditioning systems, and gaskets.

However, current automotive parts are affected as well e.g., combustion engines and textiles.

This group of chemicals is under global scrutiny because PFAS are highly persistent, increasingly detected as environmental pollutants, and some are linked to negative effects on human health. For example, the U.S. Environmental Protection Agency (US EPA) and some U.S. states have proposed, passed, and enacted laws and regulations to assess and examine PFAS chemicals. They require disclosure of PFAS used in products and prohibit the use of PFAS in products. Within the European Union, five countries have issued a proposal on a broad PFAS restriction, as early as in 2025. Similar actions are under way in the UK, Canada, and other regions.

These international and country-specific efforts are intended to address the associations between PFAS and their potential effects on human health and the environment.

As automotive manufacturers, we are committed to protecting the health of our employees and every person who drives our vehicles, the communities in which we operate, and to minimizing, as much as possible, any impact into the environment.

In this context, automotive industry associations are committed to partnering with key stakeholders on pragmatic and effective solutions to PFAS challenges. These include collaboration on deep and full identification on materials and parts containing PFAS, alternative assessments as well as effective treatment and disposal technologies.

Automotive manufacturers and suppliers will need to work closely together to develop solutions to comply with these new requirements.

Suppliers, if not already aware, should familiarize themselves with these PFAS-related laws, bills, regulatory proposals, and regulations. It takes a long time from sourcing materials to a vehicle coming on the market. Therefore, it is critical that as an entire industry we anticipate the forthcoming regulatory restrictions.

To achieve the above objectives, the Global Automotive Declarable Substance List (GADSL) was updated with hundreds of new PFAS including their reporting thresholds. Suppliers should report all PFAS used in their products through IMDS (International Material Data System) and under consideration of the very low GADSL reporting thresholds.

Furthermore, existing IMDS data needs to be revisited and updated as soon as possible.

[Here you find the document for download including Appendix A for a non-exhaustive list of laws, bills, regulatory proposals, and regulations.](#)

If any PFAS substances to be reported are not available in IMDS please request the PFAS substance to be added in the IMDS web application.

4. IMDS Recommendation 001 – important changes

On 27th May 2023, revision 12 of IMDS Recommendation 001 will get effective. You can already find the new Recommendation 001 version in the Help menu of IMDS.

Many of the changes in IMDS Recommendation 001 should be clear, but several questions arose for specific changes since the new revision has been announced. We would like to explain these changes to you.

Rule 3.2.2.C was added to the Recommendation, to reduce copies of Material MDSs. Materials are the lowest MDSs and are therefore the basis to build IMDS data. The same material can be used in hundreds of products, but it is still the same material. With every copy of the same material the effort for updates in the future raises and can hardly be managed at a certain point. Therefore, this rule was introduced to reduce the number of materials and the amount of effort maintaining materials and by this to enhance data quality.

Chapter 4.4.1.1 has a new wording, to make clear that material creators can create their own materials if they can describe the material more precisely than published Steering Committee materials do. In the past own materials were often rejected in favor of Standard Materials despite more precise data, which is not the intention of the Standard Materials.

Rule 4.4.2.H was re-phrased to add more clarity on this rule. The old rule was sometimes misunderstood that certain classifications always have a norm. Rule 4.4.2.I was deleted, as it is not always clear for the material creator how the material will be used by different customers.

Rule 4.4.5.C was newly added, to use the Application Codes “Within GADSL Limits”, if available. In the past also substances within the limit have often been declared with an application code. This default Application Codes makes reporting easier as well as assessing received MDSs, as those substances with that Application Code do not need to be verified.

Recycling has been taken out of Recommendation 001. Recycled content in IMDS will change completely with IMDS Release 14 and recycling getting more complex and more important, the IMDS Steering Committee will publish a new Recommendation about Recycling.

Chapter 4.7 Obsolete MDS was deleted from the Recommendation, as this chapter was explaining the functionality, not rules or guidelines.

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@dxs.com

5. Who to contact at the automobile manufacturers?

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

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.



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