



2026 年 9 月 7 日

IMDS 本番でのロールアウトは 2026 年 9 月 16 日を予定しています。

IMDS Release 15.4 情報

機能的な変更

1. EUDR 機能の削除

EUDR 機能は、IMDS Release 15.1 で IMDS 規制ウィザードに導入されました。しかし、当時は法的要件およびその影響がまだ変化している段階であったため、実装された機能では必要な情報を提供することができませんでした。

そのため、自動車サプライヤー団体との合意に基づき、IMDS ステアリングコミッティはこの機能を削除することを決定しました。

既存の EUDR 物質リストは IMDS に引き続き残り、法的要件に従って今後も維持・更新されます。

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チェックの変更

1. 追加のアプリケーションコード(AC)閾値チェック

ELV Annex IIに準拠してIMDSで適切なアプリケーションコード(AC)を選択できるよう、以下の閾値チェックが導入されます。

IMDS ID	Application Code	Change
72	2(c)(ii) - Recycled aluminum alloy containing unintentionally added lead	AC is only available if max. portion of lead $\leq$ 0.4%
3	3 - Alloying element in copper	AC is only available if max. portion of lead $\leq$ 4%

Table 1: Added thresholds to application code checks

この変更は、FAQ(よくあるご質問集)にリンクされている[IMDS Substance Application Code Overview](#)にも反映されていますが、チェック機能にはまだ実装されていません。

これらのアプリケーションコードが、鉛(Lead)に対してより高い含有率で割り当てられているデータシート/モジュールについては、チェック時にエラーメッセージが表示されるようになります。

2. 銅について材料分類 7.2(セラミック/ガラス)を許可

IMDSリリース15.3では、材料分類7.2(セラミックス/ガラス)について、銅が材料構成チェックの対象から除外されました。(Release Notes 15.3参照)

これにより、金、銀、銅を80%超含有していても、チェック時に警告が表示されないようになりました。

しかし、高い銅含有率の場合における、適用可能な材料分類のチェックについては更新されていませんでした。

そのため、材料分類 7.2の材料に銅が48%以上含まれている場合、現在でも以下の警告が表示されます。

材料に"Copper"が48%以上含まれていますが、選択されている材料分類7.2が適切ではありません。適切な材料分類: 3.1, 3.2, 4.2, 6.2, 7.3

このメッセージは、銅の含有率が48%以上の場合にも材料分類7.2を許可するようチェック機能を変更することで、表示されなくなります。なお、他の材料分類の材料に銅が含まれている場合には、このメッセージにおける適切な材料分類のリストに材料分類7.2も含まれます。

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運用上の変更

1. 有効期間を反映するための IMDS アプリケーションコード(AC)説明の変更

自動車サプライヤー団体の代表者および IMDS ステアリングコミッティからの提案と合意に基づき、現行の ELV Annex II に合わせて、アプリケーションコードの説明に有効期間が追加されました。更新された文言は、既存の IMDS アプリケーションコード ID (=IMDS 固有の AC 識別子) の使用時に自動的に適用されます:

IMDS ID	Current wording	New wording	Comment
70	1(b) - Continuously galvanized steel sheet containing up to 0.35% lead by weight	1(b) - Continuously galvanised steel sheet containing up to 0.35% lead by weight. This code is only valid for vehicles type-approved before 1 January 2016 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
52	4(a) - Alloying element in bearing shells and bushes for all other applications (potentially prohibited)	4(a) - Bearing shells and bushes. This code is only valid for spare parts for vehicles put on the market before 1 July 2008.	Current language in Annex II as of 16 December 2002
51	4(b) - Alloying element in bearing shells and bushes in engines, transmissions and air conditioning compressors	4(b) - Bearing shells and bushes in engines, transmissions and air conditioning compressors. This code is only valid for spare parts for vehicles put on the market before 1 July 2011.	Current language in Annex II as of 16 December 2002
73	5(a) - Lead in batteries in high voltage systems that are used only for propulsion in M1 and N1 vehicles	5(a) - Lead in batteries in high voltage systems (2a) that are used only for propulsion in M1 and N1 vehicles. This code is only valid for vehicles type approved before 1 January 2019 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022

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IMDS ID	Current wording	New wording	Comment
86	5(b)(ii) - Lead in batteries used in applications not included in entry 5(a) or entry 5(b)(i)	5(b)(ii) - Lead in batteries used in applications not included in entry 5(a) or entry 5(b)(i). This code is only valid for vehicles type approved before 1 January 2024 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
8	6 - Vibration damper	6 - Vibration dampers. This code is only valid for vehicles type-approved before 1 January 2016 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
9	Wheel balance weight	7 - Wheel balance weights. This code is only valid for vehicles type-approved before 1 July 2003 and wheel balance weights intended for servicing of these vehicles. This code expired on 1 July 2005.	Per ELV Annex II 27 June 2002. Wheel weights are no longer listed in Annex II as of the 20 September 2005 version
48	7(c) - Bonding agent for elastomers in powertrain applications	7(c) - Bonding agents for elastomers in powertrain applications containing up to 0.5% lead by weight. This code is valid only for spare parts for vehicles put on the market before 1 July 2009.	Per ELV Annex II 16 December 2022
11	Stabiliser in protective paints	9 - Stabiliser in protective paints. This code expired on 1 July 2005.	Per ELV Annex II 27 June 2002. Stabiliser in protective paints is no longer listed in Annex II as of the 20 September 2005 version.
12	Carbon brushes for electric motors	10 - Carbon brushes for electric motors. This code is only valid for vehicles type-approved before 1 July 2003 and carbon brushes for electric motors intended for servicing of these vehicles. This code expired on 1 January 2005.	Per ELV Annex II 27 June 2002. Carbon brushes are no longer listed in Annex II as of the 20 September 2005 version.

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IMDS ID	Current wording	New wording	Comment
53	8(a) - Lead in solder used in electronic circuit board applications	8(a) - Lead in solders to attach electrical and electronic components to electronic circuit boards and lead in finishes on terminations of components other than electrolyte aluminium capacitors, on component pins and on electronic circuit boards. This code is only valid for vehicles type-approved before 1 January 2016 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
54	8(b) - Lead in solders in electrical applications other than soldering on electronic circuit boards or on glass	8(b) - Lead in solders in electrical applications other than soldering on electronic circuit boards or on glass. This code is only valid for vehicles type-approved before 1 January 2011 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
55	8(c) - Lead in finishes on terminals of electrolyte aluminium capacitors	8(c) - Lead in finishes on terminals of electrolyte aluminium capacitors. This code is only valid for vehicles type-approved before 1 January 2013 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
56	8(d) - Lead used in soldering on glass in mass airflow sensors	8(d) - Lead used in soldering on glass in mass airflow sensors. This code is only valid for vehicles type-approved before 1 January 2015 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
67	8(f)(a) / 8(f)(i) - Lead in compliant pin connector systems	8(f)(a) / 8(f)(i) - Lead in compliant pin connector systems. This code is only valid for vehicles type-approved before 1 January 2017 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
68	8(f)(b) / 8(f)(ii) - Lead in compliant pin connector systems other than the mating area of vehicle harness connectors	8(f)(b) / 8(f)(ii) - Lead in compliant pin connector systems other than the mating area of vehicle harness connectors. This code is only valid for vehicles type-approved before 1 January 2024 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022

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IMDS ID	Current wording	New wording	Comment
75	8(g)(i) - Lead in solders to complete a viable electrical connection between semiconductor die and carrier within integrated circuit flip chip packages	8(g)(i) - Lead in solders to complete a viable electrical connection between semiconductor die and carrier within integrated circuit flip chip packages. This code is only valid for vehicles type approved before 1 October 2022 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
76	8(g)(ii-i) - Lead in solders to complete a viable electrical connection between the semiconductor die and the carrier within integrated circuit flip chip packages where that electrical connection consists of a semiconductor technology node of 90 nm or larger	8(g)(ii-1) - Lead in solders to complete a viable electrical connection between the semiconductor die and the carrier within integrated circuit flip chip packages where that electrical connection consists of a semiconductor technology node of 90 nm or larger. This code is only valid for vehicles type approved before 1 October 2022 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
77	8(g)(ii-ii) - Lead in solders to complete a viable electrical connection between the semiconductor die and the carrier within integrated circuit flip chip packages where that electrical connection consists of a single die of 300 mm ² or larger in any semiconductor technology node	8(g)(ii-2) - Lead in solders to complete a viable electrical connection between the semiconductor die and the carrier within integrated circuit flip chip packages where that electrical connection consists of a single die of 300 mm ² or larger in any semiconductor technology node. This code is only valid for vehicles type approved before 1 October 2022 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
78	8(g)(ii-iii) - Lead in solders to complete a viable electrical connection between the semiconductor die and the carrier within integrated circuit flip chip packages where that electrical connection consists of stacked die packages with dies of 300 mm ² or larger, or silicon interposers of 300 mm ² or larger	8(g)(ii-3) - Lead in solders to complete a viable electrical connection between the semiconductor die and the carrier within integrated circuit flip chip packages where that electrical connection consists of stacked die packages with dies of 300 mm ² or larger, or silicon interposers of 300 mm ² or larger. This code is only valid for vehicles type approved before 1 October 2022 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022

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IMDS ID	Current wording	New wording	Comment
60	8(h) - Lead in solder to attach heat spreaders to the heat sink in power semiconductor assemblies	8(h) - Lead in solder to attach heat spreaders to the heat sink in power semiconductor assemblies with a chip size of at least 1 cm ² of projection area and a nominal current density of at least 1 A/mm ² of silicon chip area. This code is only valid for vehicles type-approved before 1 January 2016 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
61	8(i) - Lead in solders in electrical glazing applications on glass except for soldering in laminated glazing	8(i) - Lead in solders in electrical glazing applications on glass except for soldering in laminated glazing. This code is only valid for vehicles type-approved before 1 January 2016 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
62	8(j) - Lead in solders for soldering of laminated glazing	8(j) - Lead in solders for soldering of laminated glazing. This code is only valid for vehicles type-approved before 1 January 2020 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
79	8(k) - Soldering of heating applications with 0,5A or more of heat current per related solder joint to single panes of laminated glazings not exceeding wall thickness of 2,1 mm. This exemption does not cover soldering to contacts embedded in the intermediate polymer	8(k) - Soldering of heating applications with 0.5 A or more of heat current per related solder joint to single panes of laminated glazings not exceeding wall thickness of 2.1 mm. This exemption does not cover soldering to contacts embedded in the intermediate polymer. This code is only valid for vehicles type-approved before 1 January 2024 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
15	Valve seats	9 - Valve seats. This code is only valid for spare parts for engine types developed before 1 July 2003.	Per ELV Annex II 16 December 2022
65	10(c) - Lead in dielectric ceramic materials of capacitors with a rated voltage of less than 125 V AC or 250 V DC	10(c) - Lead in dielectric ceramic materials of capacitors with a rated voltage of less than 125 V AC or 250 V DC. This code is only valid for vehicles type-approved before 1 January 2016 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022

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IMDS ID	Current wording	New wording	Comment
66	10(d) - Lead in the dielectric ceramic materials of capacitors compensating the temperature-related deviations of sensors in ultrasonic sonar systems	10(d) - Lead in the dielectric ceramic materials of capacitors compensating the temperature-related deviations of sensors in ultrasonic sonar systems. This code is only valid for vehicles type-approved before 1 January 2017 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
17	Glass in bulbs and glaze of spark plugs	15 - Glass in bulbs and glaze of spark plugs. This code expired on 1 January 2005.	Per ELV Annex II 27 June 2002. Glass in bulbs and glaze of spark plugs is no longer listed in Annex II as of the 20 September 2005 version.
18	11 - Pyrotechnic initiators	11 - Pyrotechnic initiators. This code is only valid for vehicles type-approved before 1 July 2006 and replacement initiators for these vehicles.	Per ELV Annex II 16 December 2022
21	13(a) - Corrosion preventive coatings	13(a) - Corrosion preventive coatings. This code is only valid for spare parts for vehicles put on the market before 1 July 2007.	Per ELV Annex II 16 December 2022
49	13(b) - Corrosion preventive coatings related to bolt and nut assemblies for chassis applications	13(b) - Corrosion preventive coatings related to bolt and nut assemblies for chassis applications. This code is only valid for spare parts for vehicles put on the market before 1 July 2008.	Per ELV Annex II 16 December 2022
80	14(i) - Hexavalent chromium as an anticorrosion agent of the carbon steel cooling system in absorption refrigerators up to 0.75% by weight in the cooling solution designed to operate fully or partly with electrical heater, having an average utilised electrical power input <75W at constant running conditions	14(i) / 14(a) - Hexavalent chromium as an anticorrosion agent of the carbon steel cooling system in absorption refrigerators up to 0.75% by weight in the cooling solution designed to operate fully or partly with electrical heater, having an average utilised electrical power input <75 W at constant running conditions. This code is only valid for vehicles type-approved before 1 January 2020 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022

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IMDS ID	Current wording	New wording	Comment
81	14(ii) - Hexavalent chromium as an anticorrosion agent of the carbon steel cooling system in absorption refrigerators up to 0.75% by weight in the cooling solution designed to operate fully or partly with electrical heater, having an average utilised electrical power input ≥ 75 W at constant running conditions	14(ii) / 14(b) - Hexavalent chromium as an anticorrosion agent of the carbon steel cooling system in absorption refrigerators up to 0.75% by weight in the cooling solution designed to operate fully or partly with electrical heater, having an average utilised electrical power input ≥ 75 W at constant running conditions. This code is only valid for vehicles type-approved before 1 January 2026 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
82	14(iii) - Hexavalent chromium as an anticorrosion agent of the carbon steel cooling system in absorption refrigerators up to 0.75% by weight in the cooling solution designed to fully operate with nonelectrical heater	14(iii) / 14(c) - Hexavalent chromium as an anticorrosion agent of the carbon steel cooling system in absorption refrigerators up to 0.75% by weight in the cooling solution designed to fully operate with nonelectrical heater.	Per ELV Annex II 16 December 2022
25	15 - Discharge lamps and instrument panel displays	15 - Discharge lamps for headlight application and fluorescent tubes used in instrument panel displays. This code is only valid for vehicles type-approved before 1 July 2012 and spare parts for these vehicles.	Per ELV Annex II 16 December 2022
28	Thick film pastes	16 - Thick film pastes. This code expired on 1 July 2006.	Per ELV Annex II 27 June 2002. Thick film pastes is no longer listed in Annex II as of the 1 August 2008 version.
29	16 - Batteries for electrical vehicles	16 - Batteries for electrical vehicles. This code is only valid for spare parts for vehicles put on the market before 31 December 2008.	Per ELV Annex II 16 December 2022
50	Optical component in a glass matrix used for Driver Assistance Systems	18 - Optical components in glass matrixes used for Driver Assistance Systems. This code expired on 1 July 2007.	-

Table 2: Changes in application code wording

この変更は、FAQ(よくあるご質問集)にリンクされている[IMDS Substance Application Code Overview](#)にも反映されます。

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2. MCCP 化学物質グループの名称変更

「Medium Chain Chlorinated Paraffins (MCCP)」という化学物質グループは、規制情報ウィザードにおけるMCCP規制の基礎となっています。規制情報ウィザードに入力された規制情報に応じて、その化学物質がSVHCとして扱われるかどうかが決まります。
([Release Notes 15.0](#)参照)

この点を明確にするとともに、常にSVHCとして扱われるMCCP(下記参照)と区別するため、このグループの名称を「Potentially MCCP containing substances」に変更します。

3. 化学物質グループからの MCCP 物質の削除

影響を受けるすべての化学物質参照について、現在SVHCではないと表示されているものが、再びSVHCとして更新されます。(下記参照)これらの更新内容は、DSファイルおよびPDSファイルにも反映されます。

以下の化学物質は、常にSVHCに該当することが確認されているため、MCCP規制 / 動的SVHC処理の対象外となります。そのため、これらの化学物質は「Potentially MCCP containing substances」という化学物質グループから削除されます。

Node ID	CAS No.	Substance name
1401560202	3922-32-5	1,1,1,15-Tetrachloropentadecane
1401560210	67095-51-6	1,1,1,3-Tetrachloropentadecane
1401560209	62108-59-2	1,1,1-Trichloropentadecane
10877789	68955-41-9	Alkane, C10-18-, Brom- Chlor-
33192980	85681-73-8	Alkanes, C10-14, chloro
32560996	84082-38-2	Alkanes, C10-21, chloro [Chlorinated paraffins]
1401560189	104948-36-9	Alkanes, C10-22, chloro
814922374	97659-46-6	Alkanes, C10-26, chloro
814908000	84776-06-7	Alkanes, C10-32, chloro
33192878	85536-22-7	Alkanes, C12-14, chloro
1401560187	1372804-76-6	Alkanes, C14-16, chloro
454921	85535-85-9	Alkanes, C14-17, chloro
1401560191	129521-61-5	Alkanes, C14-32, chloro
70103521	84776-07-8	Alkanes, C16-27, chloro
50518365	85049-26-9	Alkanes, C16-35, chloro
32560896	68920-70-7	Alkanes, C6-18, chloro

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Node ID	CAS No.	Substance name
1401560218	866758-65-8	Chloroalkanes, C12-16
1401560200	308061-49-6	Chloroalkanes, C14-18
1401560199	28085-66-7	Heptachloroheptadecane
1401560206	57437-58-8	Heptachlorohexadecane
1401560208	57437-61-3	Heptachloropentadecane
1401560190	126207-70-3	Heptadecane, chloro-
1401560213	700864-27-3	Hexachloroheptadecane
1401560197	276673-44-0	Hexachlorohexadecane
1401560207	57437-60-2	Hexachloropentadecane
1401560205	57437-57-7	Hexadecane, pentachloro-
1401560212	700864-25-1	Hexadecane, tetrachloro-
1401560222	52737-80-1	KhP 1100
1401560216	700864-29-5	Nonachloroheptadecane
1401560215	700864-28-4	Octachloroheptadecane
1401560198	276673-45-1	Octachlorohexadecane
1401560196	276673-41-7	Octachloropentadecane
814921245	97553-43-0	Paraffins (petroleum), normal C>10, chloro
1401560204	57437-56-6	Pentachloropentadecane
1401560195	2233595-19-0	Pentadecane, 2,5,6,11,14-pentachloro-
1401560192	159715-72-7	Pentadecane, 3,5,7,9,11,13-hexachloro-
1401560219	97262-09-4	Pentadecane, tetrachloro-
1401560234	-	Reaction mass of alkanes, C14-17, chloro and paraffin waxes and hydrocarbon waxes, chloro
1401560220	2097144-44-8	Slack Wax (petroleum), chloro
1401560217	865306-25-8	Tetradecane, 1,1,1,3-tetrachloro-
1401560194	221174-09-0	Tetradecane, 1,2,13,14,?,?-hexachloro-
1401560193	221174-08-9	Tetradecane, 1,2,13,14,?-pentachloro-
1401560188	198840-65-2	Tetradecane, chloro derivs.
1401560203	57437-53-3	Tetradecane, tetrachloro-
1401560221	39443-51-1	WK 30 (chloroparaffin)

Table 3: Substances removed from MCCP substance group

影響を受けるすべての化学物質は、リリース済みのMCCP規制情報で提供されているデータの内容にかかわらず、再びSVHCとして表示されます。最新版としてリリースされているバージョンにおいて、これらの化学物質を参照しているすべてのMCCP規制情報は、「不完全」としてマークされます。