



## Zuliefererkreis Treffen am 18.02.2004 bei DuPont in Hamm-Uentrop

- Begrüßung
- Vorstellung des Gastgebers
- Organisation der Werksführungen
- Ergänzungen zur Tagesordnung
- Anmerkungen zur letzten Sitzung / Protokoll
- OEM / CLEPA Konferenz Brüssel : Ergebnisse
- Change Management ( C. Ramón )
- Gültigkeit von LA/ZK Vereinbarungen
- IMDS Recommendations ( Abstimmung mit Zulieferern! Bericht zur Überarbeitung von C. Ramón)
- Neue IMDS Prüfung bei Audi ( H.A. Sohn, Küster ), Ablehnungen SAAB ( Daum/ Tenneco), Siemens weist deutschsprachige Berichte zurück ( Dr. Götz, Leoni )
- Einheitliche Akzeptanzkriterien aller OEMs ?
- Materialdeklaration nach ISO 1043 Definition einer Zulieferer-Position
- Kommentarfeld Werkstoffe ( S. Aßmann, Bosch )
- REACH: Relevanz für Automobilzulieferer ( DuPont )
- Revision Annex II ( VDA Schreiben)
- Berichte über die CLEPA Arbeitsgruppen. Weitere Ergebnisse
- Globale Substanzliste, ILRS, Stand der Diskussionen ( R. Kurzknabe )
- Die nächsten Treffen: Angebote für März oder April sind willkommen.

## Welcome

Wolfgang Diegmann welcomes the participants

## Presentation of the host company

Christoph Grewe, DuPont Uentrop Engineering Polymers Director, presents the DuPont Uentrop site and their activities. Commercial and industrial areas have been created at the Uentrop site, which are still available for companies to acquire or rent. In case of interest, please contact Mr. Grewe under Tel: +49-2388-92-0 or Fax: +49-2388-92-7147.

## Organisation of the plant visit

Guide: Michael Fehlings. Several plant tours have been organised.

## Additions to the agenda

- Improvement of user friendliness of IMDS – comments requested from EDS
- IMDS SC needs to decide on interface release for software users others than EDS licensees (download of reports into in-house systems).
- Peter Müller from EDS is asked to prepare presentation on description/characterisation of interface (next IMDS ZK meeting).
- Suppliers need to define requirements for interface.
- 'Basic Substance Change List' – what is this?
- Status – material declarations.

## Remarks to the last meeting protocol

The last meeting protocol is accepted without remarks.

## OEM / CLEPA conference, Brussels: Results

- IMDS list of declarable substances has been finalised and will be introduced in March, replacing the individual OEM lists and the VDA list. Recommendation is made to only use one list – in this case the IMDS substance list – and not anymore individual OEM lists.
- VDA list should remain as second list until further notice (Peter Müller, EDS). The IMDS ZK suggests to also take out the VDA list and only have 1 list as reference.
- Automatic check (example Ford) rejects data sheets, which are ok as per Ford verification (Dr. Voss). Dr. Schmitz to be involved in order to get this issue solved.
- Clear-cut (1 date without transition) for change over to the new list of declarable substances is suggested.

Presentation from Frank Bredemeier, Visteon:

Status of work groups.

*See separate file with presentation*

Comments:

- Need for uniformity in the presentation of IMDS data, not only the structure of the data.
- Flat bill declaration seems, in spite of being defined in a Recommendation, not been generally accepted since OEMs require deeper declaration for first approval declarations. Different OEMs have different requirements. Reason seems also to be OEM in-house system differences, requiring different information and not being harmonised with IMDS.
- IMDS Standard 101 needs to be checked out in how far flat bill agreements are affected.
- Problems also are 'confidential' entries from sub suppliers, based on agreements between sub-supplier and OEM. Such entries are not visible to higher Tier, which then cannot be incorporated into the flat bill. Assessment of probable content of the 'confidential' entries is needed in such cases.
- Worst case analysis (filter systems) as basis for flat bill design is recommended as most practical approach.
- Coatings are a problem since some Tiers / OEMs require MDB for each individual colour. Within a working group, the question of painted parts will be addressed.

IMDS is considered by the OEMs as part of the first sampling submission. This then justifies that mould costs are retained when IMDS MDBs are missing. However, the IMDS Use Conditions do not cover such consideration of IMDS MDBs, to be part of a first sampling submission.

## **Change Management**

There is no IMDS functionality to define which data sheets are affected by a change of a declarable substance lists. Existing parts do not need to be modified as result of a change of declarable substance lists. Re-submission of a MDB for a new part will require updated content.

**Recommendation to polymer suppliers:** Via Internet (individual company sites), inform supply chain of materials for which changes have been made following a revision of the IMDS declarable substance list.

Basic substance list: IMDS note will be issued on the IMDS Internet site.

OEM In house systems check against recommendations valid at date of verification by the OEM, not at date of establishment of the MDB. Any change of recommendations in-between both dates create potential for rejects. In house systems of the OEMs need to apply for their check the recommendations valid at the date of the establishment of the MDB.

The same effect occurs with MDBs of lower Tiers. The question is unsolved, how their MDBs, in compliance with recommendations when issued, can be handled after recommendation changes. The time lack is becoming more important as further down the supply chain the MDB has been issued.

### **Request of IMDS ZK to IMDS SC:**

Change of recommendations to become effective only together (same date) with annual change of the list of declarable substances. There should be no implementation of changes following a modification of recommendations separately from this date.

Automatic checks (VW, Audi, Ford, others to come) partly lead to rejects of MDB compliant to recommendations. Each OEM is expected to have an own system with different criteria and check processes. Problematic is that no answer is possible to automatic rejects – how to start a dialog?

### **Request of IMDS ZK to IMDS SC:**

Harmonise automatic checks in between OEMs for consistency.

### **Request of IMDS ZK to IMDS SC:**

Annex II and other exceptions to be included into the checks in a way, that allowed applications pass the checks.

## **Validity of LA/ZK agreements**

Based on previous comments from the OEM side during IMDS ZK meetings, the LA/ZK agreements have to be considered as valid and applicable.

## **IMDS Recommendations (Agreement with suppliers! Status report of reviews C. Ramón)**

Information by Rainer Kurzknabe (in absence of Mrs. Ramon):

Status: 2 meetings have been conducted, no final result so far. Some additives (e.g. toughener) can be included into polymer; fillers may be introduced again as basic materials into IMDS. Flame retardant additives are still under discussion; entries for plasticisers is still an unsolved issue. The request from the polymer producers to have small additive amounts included in polymers without specific mention is not accepted by OEMs so far. Possible solution proposed by IMDS ZK: Chemical industry to establish plasticiser groups, which then need to be made available in IMDS (how ???).

## **New IMDS checks at Audi ( H.A. Sohn, Küster ), Rejects SAAB ( Daum/ Tenneco), Siemens rejects German entries ( Dr. Götz, Leoni )**

Discussed above

## **Uniform acceptance criteria of all OEMs ?**

Discussed above

## **Material declarations acc. ISO 1043. Definition of supplier position**

Will be result of the agreements between APME and the IMDS Steering Committee for IMDS recommendations 001 and 010.

## **Remark field Materials ( S. Aßmann, Bosch )**

OEMs partly have requirements for entries into the remark field to identify Annex II exceptions. Also, GM requires specific Opel list compliance confirmation. Lack of consistency for the remark field requirements leads to the need for multiple MDBs, only due to remark field entries, which are not identical. The basic substance list should include information concerning materials, which are allowed by Annex II. This is possible/has been discussed, but no timing was defined for introduction of such solution. Planned is a check box for Annex II allowed materials/parts and/or compliance confirmation together with a date field.

### **Request of IMDS ZK to IMDS SC:**

Introduction of check box for materials/part compliance confirmation with ELV together with a date field.

## **Chrome 6+ (surface plating) replacement for supplied parts – approach**

OEMs have advanced the phase out of chrome (VI).

Approval of small parts (e.g. bulk parts like screws) as bulk approval for the automotive industry is needed.

Individual approval for all parts seems to be difficult to handle. Application requirements are not always known in their full spectrum (corrosion resistance, friction behaviour, etc.). Issue needs solution .....

Due to the needed production process replacements, change to chrome (VI) free solutions will be phased in over a certain period of time. During this time both, chrome (VI) and chrome (VI) free products can be provided.

The appropriate metal association will be contacted to get information on their activities (evaluation programs, tests, etc.). The proposal is made to invite a representative to a next IMDS ZK meeting.

## **REACH: Relevance for automotive suppliers ( DuPont )**

Presentation of Dr. Watze de Wolf, DuPont Corporate SHE Manager

*See separate file with presentation*

**Recommendation:** Automotive suppliers to work with trade associations to prevent inclusion of articles into the REACH scope.

## **Assessment of materials which changes during processing**

For coatings, as defined in IMDS Recommendation 001, the finished coating has to be declared. It is suggested, if possible, to use average substance amounts (definite value), not ranges. A Work Group is suggested to define the way, painted parts have to be declared. Thomas May, DuPont Performance Coatings, offers his participation. For materials, which change due to processing conditions, the assessment needs to be done by the material user in how far declaration limits have been exceeded.

## **Revision Annex II ( VDA letter)**

Please refer to mail from Mr. Diegmann. Revisions are minor. Associations need to become involved to support requests for modifications. This will provide better assurance for appropriate consideration.

## **Disclaimers**

Opel has reviewed disclaimers from different providers of IMDS MDB . The Legal Dept. from Opel has been involved to check the validity of such disclaimers. Wording may need to be reviewed in order to make sound disclaimers less ‘aggressive’. Proposed is ‘worst case declaration’, which then needs a ‘lower level disclaimer’. This issue may become a Work Group item between the IMDS ZK and the IMDS SC (Mr. Diegmann to follow up).

An assessment of product and producer liability (by the University of Karlsruhe) concerning German environmental regulations has been published. Mr. Bartsch, HUF, agrees to present a summary during the next meeting.

## **Report concerning CLEPA work groups. Further results**

Discussed above

## **Global Substance List, ILRS, Status of discussion ( R. Kurzknabe )**

A global meeting of a joint industry group automotive / chemical industry will take place on 25/26 February 2004 in Brussels. So far 3 members of the IMDS Steering Committee are registered, Mr. Lüssmann-Geiger, Dr. Schmitz, Mr. Lundström.

The IMDS list of declarable substances has been established under the sole management of the IMDS Steering Committee and is not a precursor of the intended global joint industry list, which should become the successor of the VDA list. The IMDS Steering Committee has indicated it's intend to replace the IMDS list of declarable substances by a global list of declarable substances once available.

**Next meeting: Offers for March or April are welcome.**

Tec4U, Saarbrücken, ([m.sander@tec4u.com](mailto:m.sander@tec4u.com).) with demonstration of shredder outcome, produced through different processes.

Date: 30 March 2004

The suggestion has been made to revive the project to visit a recycling company (not dismantler, real recycling company).

SICON (or Schwarze Pumpe) process to further treat shredder light fraction may be considered.

Tec4U will take over the management of the IMDS ZK Forum. All documentation will be made available from the forum. Address: [www.imds-zk.com](http://www.imds-zk.com)

[www.imds-zk.de](http://www.imds-zk.de)

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The new site will have additional functionality:

- Meeting participation registration will be possible through the Internet site.
- Free access without registration.
- EDS is requested to create a link to this Internet site from the IMDS home page (Peter Müller).

**Additional information.**

- Packaging, protective films: not included in the IMDS scope.
- Silicone rubber to be declared as 100% silicone rubber (Wacker position as one of the suppliers). Type of silicone to be identified as per ISO 1043.
- Printing inks to be declared as 100% ink.
- 'Sicherungslack' has not to be declared.

**End of meeting.**

16.00h