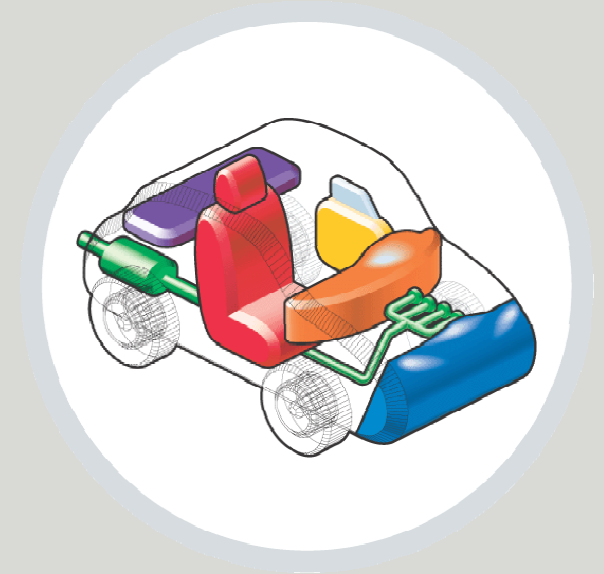


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Technical perfection, automotive passion.

# IMDS WG RANGES

Supplier Group Meeting, Stuttgart 23 April 2009



# IMDS Working Group RANGES

•1st Meeting                      12 March 2009

•2nd Meeting                      24 March 2009

## •Involved Participants

T. May/ DuPont

K. Oldenburg/ BMW

B. Baney/ Delphi

D. Hill/ GM

B. Prazenicova/ JCI

U. Bolay/ Beru

G. Tosatti for L. Zullo/ ETRMA

B. Plaga/ VW

H. Traiser/ Material Data Management

M. Buczilowski/ Faurecia

K. Katsuhisa/ Denso/ for JAPIA

## Target:

- Reduce & Adjust number of range tables (1 out of 3)
- Simplify check routines while keeping data quality
- Suggestion
  - on how to deal with Warnings due to insignificant deviations from the ranges (0,001%)
  - on how to deal with FIX values

**Overall workload reduction**

**due to less rejections & simplified data creation and checking**

## Proposition:

- **Today's rules to create MDS's are**
  - **very accurate regarding the given ranges**
  - **sufficient to fulfil each legal requirement and need**
- **Data quality will not improve while revising Warnings regarding 0,001% deviations**
- **Material Manufacturer have the best knowledge regarding materials constitution**

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## Recommended steps:

- Proposal to Steering Committee/ K. Oldenburg
- Proposal to suppliers group via CLEPA (6 April) with request to comment and feed back
- Presentation to suppliers (today)

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## Conclusions & Suggestions

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## Rule No. 1:

If the portion type “range” is used, the ranges given shall reflect the *real variations* of a basic substance in a material. Ranges must not be used as a means to avoid declaring the full composition of a material.

This means that MDSs with substance ranges above the maximum ranges given in Rule No. 2 may be accepted if these substance ranges reflect the real variations of the substances in the material.

Vice versa, it also means that MDSs with substance ranges within the maximum ranges given in Rule No. 2 may be rejected if these substance ranges do not reflect the real variations of the substances in the material.

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1 out of 3

## Rule No. 2:

If the portion type “range” is selected, for substances the following maximum portion ranges apply:

**Portion: from X % to Y %**

**Maximum M = Y % – X %**

$$0 \leq X < 7.5$$

$$M \leq 3$$

$$7.5 \leq X < 20$$

$$M \leq 5$$

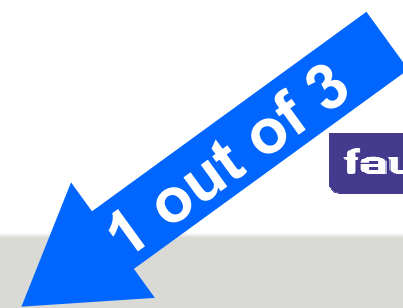
$$20 \leq X \leq 100$$

$$M \leq 10$$

If such a range is used (e.g. 3 % - 6 %), the smaller number defines the range limits to be used. Therefore the range 3 % – 8 % (M = 5) is not allowed because for 3 % only a range of +/- 1.5 % (M = 3) can be applied.



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Other materials

**Lubricants**

**5g- rule**

$$0 \leq X < 7.5(0-5)(10)$$

$$7.5 \leq X < 20(5-20)(10-20)$$

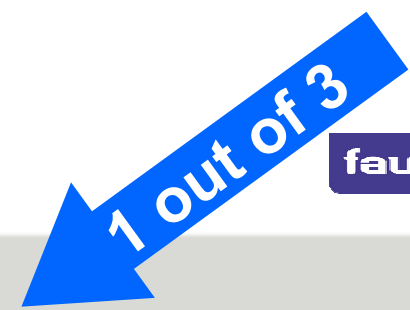
$$20 \leq X \leq 100(20-50) \\ (50-100)$$

$$M \leq 3(4)(2)$$

$$M \leq 5(6)(4)$$

$$M \leq 10(10 \text{ from } 0-100)(6) \\ (10)$$

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$0 \leq X < 7.5$   
 $7.5 \leq X < 20$   
 $20 \leq X \leq 100$

$M \leq 3$   
 $M \leq 5$   
 $M \leq 10$

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1 out of 3

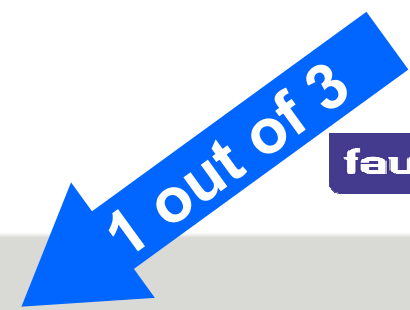
*Exemptions from this rule:*

A basic substance as part of a material is defined with a larger range in a **public norm** (although in this case, the respective material MDSs published by the IMDS Steering Committee shall preferably be used).

A basic substance as part of a material is defined with a larger range in an **in-house specification**. This in-house specification has to be part of the delivery conditions.

Basic substances in **MDSs published by the Steering Committee** (Supplier: IMDS-Committee, ID 423; IMDS-Committee/ILI Metals, ID 18986 or Stahl und Eisen Liste, ID 313).

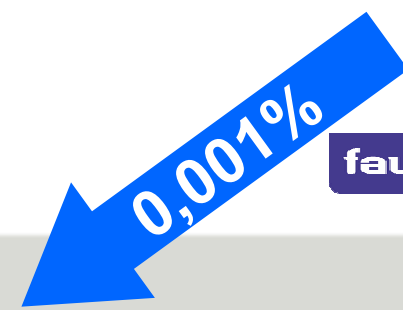
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## Next Steps:

- Range table will be part of the revised REC001
- All other range tables will be deleted
- Supplier to comment & feed back within next 2 weeks
  - Lubricants
  - Paints
  - Leather
  - ...

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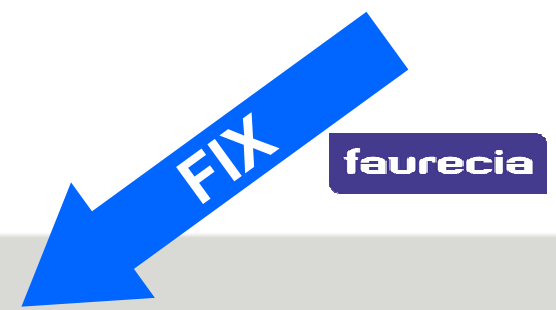
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Suggestion:

**Warnings**, even in terms of insignificant deviations, must not be considered as **Errors**

Warning: Acrylonitrile-butadiene-styrene copolymers: Range of portion may not exceed allowed percentage.  
Warning: Misc.: not to declare: Range of portion may not exceed allowed percentage.  
Warning: LLDPE Pigment (30-814884): More than 10% not specified substances.  
Warning: Acrylonitrile-butadiene-styrene copolymers: Range of portion may not exceed allowed percentage.  
Warning: Copper: Range of portion may not exceed allowed percentage.  
Warning: Nickel: Range of portion may not exceed allowed percentage.  
Warning: Carbon black: Range of portion may not exceed allowed percentage.  
Warning: Phosphate & Oil: More than 10% not specified substances. ("No

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## Discussed in WG:

- **Material manufacturer uses fixed values instead of ranges**
- **Considered as being not in line with the real constitution of a material**

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**Merci**

**Vos questions s.v.p.**