

CLEPA statement regarding a strategy for the deactivation of Rec019

At the end of 2019 the IMDS community has been informed that the IMDS Steering Committee has voted unanimously for a deactivation of the Recommendation 019 (Rec019). This decision is based on “automobile manufacturers failing to comply with type approval conditions” also as a consequence of “the supply chain using Rec019 materials in IMDS declaration”.

The follow up letter sent out 10th of February 2020 by IMDS SC caused a lot of confusion and uncertainties. The letter caused more questions rather than answers on the deactivation itself, the rules, and also its impact on existing IMDS data sheets.

Deactivation of the Rec019 needs an agreed action plan between all actors in the automotive industry, otherwise it will imply potential business disruption as of 1st July 2020. Those disruptions will most likely occur earlier, if Tiers or single member companies of the IMDS SC require the new declaration approach even earlier as announced so far.

Even though the unsatisfied dialogues during past months including the lack of reaction on argumentation given by ZVEI and the supplier associations during IMDS SC meetings in October 2019 and January 2020, CLEPA members agree on the general approach to deactivate the Rec019 published data sheets.

However, CLEPA calls the IMDS SC for active dialogue & cooperation with the supplier associations to agree on defined rules beforehand and to ensure a smooth transition without endangering PPAP.

Experience made over the past years in daily business and pilot projects conducted by Tier 1 suppliers, have shown that the following actions need to be taken and rules must be updated:

- Suppliers of electronic parts need to adopt changed requirements for data reporting
- The whole supply chain will need to increase resources
- Company IT systems need to be adjusted in order to cover the required actions/tasks
- IMDS rules for electronic parts below 5 grams need to be re-evaluated. For example:
 - Rule 4.4.2.C (Material description according to public standard)
 - Rule 4.4.1.1.A (IMDS SC materials preferably to be used, instead of own created materials)
 - Rule 4.4.1.E (Material MDS to be created solely by material manufacturers)
 - Rule 4.4.1.D (Homogeneous material)
 - Rule 4.4.2.G (Classification of materials).
- Awareness needs to be spread around the whole supply chain. There is a need for setting up a detailed action plan for an appropriate and realistic transition process.

CLEPA therefore calls for an extension of the transition period, based on the arguments above. We expect that further 24 months are needed, in order to organize this fundamental change in IMDS effectively.

We appreciate the further dialogue in the upcoming weeks, in order to resolve the still existing blocking points and to achieve improved material declarations in IMDS to fully satisfy legal requirements for electronic parts.