Company specific substance restrictions in addition to GADSL

The suppliers, who are members of the two automotive associations CLEPA (The European Association of Automotive Suppliers) and JAPIA (Japan Auto Parts Industries Association) are committed to providing information on regulated substances and have implemented a continuous process for gathering information, as necessary, to demonstrate compliance with legal obligations on materials, used in the automotive industry.

Within the worldwide automotive industry in 2004, a globally harmonized list of regulated substances, known as the Global Automotive Declarable Substance List (GADSL), was introduced and is used and widely accepted within the global automotive supply chain. This list is maintained and updated regularly by a global working group of experts to ensure that all worldwide upcoming new substance regulations, relevant for automotive components, will be evaluated and included, subject to consensus.

IMDS (International Material Data System) is the widely accepted material compliance tool in the automotive value chain. GADSL is fully integrated into the IMDS Basic Substance List (BSL) and compliance with GADSL can be easily demonstrated in IMDS by color codes and analysis functions. The IMDS rules clearly refer to GADSL.

In a considerable number of cases, which the signatories have become aware of, companies in the automotive supply chain or even car manufacturers themselves, confront their suppliers with lists of restricted substances in addition to the GADSL.

These additional requirements are very difficult to handle, especially because it needs to be cascaded to sub-suppliers, several tiers down. Furthermore, additional material compliance confirmations, besides the routine process in IMDS, might be necessary, e.g. signed confirmation papers. This increases the burden in the supply chain significantly, especially for smaller companies.

CLEPA and JAPIA members unanimously support the use of the GADSL and IMDS as the basis for material compliance reporting along the supply chain. To ensure that the automotive value chain can fully meet material compliance requirements, the following should be considered:

- Automotive companies should refer to the GADSL only, as additional paper work, like signed confirmation papers, may be necessary in addition to IMDS. The well-established and globally accepted IMDS shall not be undermined.
- If automotive companies consider additional substances or thresholds to be a matter of regulation, they should use the official application via a dossier to Global Automotive Stakeholders Group (GASG) to have it added to the GADSL.
- Lists for process chemicals and lists of substances from chemicals (which remain in the car and fall under the scope of GADSL and IMDS) shall be separated.

CLEPA is the European Association of Automotive Suppliers. Over 120 of the world's most prominent suppliers for car parts, systems and modules and 23 National trade associations and European sector associations are members of CLEPA, representing more than 3 thousand companies and covering all products and services within the automotive supply chain. Based in Brussels, Belgium, CLEPA is recognised as the natural discussion partner by the European Institutions, United Nations and fellow associations (ACEA, JAMA, MEMA, etc.).

JAPIA is the Japan Auto Parts Industries Association. JAPIA was established by reorganizing a former auto parts industry association to better serve the public interest in August 1969. A total output of auto parts by JAPIA member companies (440) now amounts to 20trillion yen, and they operate not only in Japan, but also worldwide with over 1300 manufacturing facilities around the world in support of global automobile production activities. JAPIA has headquarters in Tokyo and three branches: Kanto Branch Office, Chubu Branch Office and Kansai Branch Office. Headquarters conducts various activities as well in coordination with related government agencies and organizations in addition to running each of committees.