Lear IMDS Requirements to Suppliers

Purpose:

This document outlines the specific requirements of Lear for validating Material Data Sheets (MDS) through the International Material Data System (IMDS). It is designed to complement the IMDS Manual and Recommendations, along with the specific requirements of original equipment manufacturers (OEMs). The IMDS Information Pages serve as the essential requirement for generating an acceptable IMDS submission to Lear.

Contents:

Notes:

- *Failure to comply with Lear's IMDS Requirements Manual, IMDS Recommendations, and Customer Specific Requirements will result in rejection of the submitted MDS.*
- *Suppliers are required to rectify all errors present in their IMDS submissions, not limited to Lear's rejections alone.*
- *Past acceptance of a similar MDS report in the past does not provide assurance against future rejections.*

Abbreviations:

- BPR Biocidal product regulation
- CAMDS China Automotive Data System
- CSR Customer Specific Requirements
- ELV End of Life Vehicle Directive
- GADSL Global Automotive Declarable Substance List
- IMDS International Material Data System
- IMDS SC IMDS Steering Committee
- MDS Material Data Sheet
- MMDS Material Material Data Sheet
- PPAP Production Part Approval Process
- REACH Registration, Evaluation and Authorization of Chemicals
- ROHS Restriction of Hazardous Substances in Electrical and Electronic Equipment
- SCIP Substance of Concern In articles and complex Products
- SVHC Substance of Very High Concern

1. Registration of IMDS Company ID or Organization ID

- Suppliers can refer to the following link for instructions on getting access to the IMDS webpage: https://public.mdsystem.com/en/web/imds-public-pages/new2imds
- Suppliers for CAMDS are required to inform Lear to register their company with CAMDS and visit the CAMDS webpage www.camds.org.cn

2. Lear IMDS Site

- IMDS/CAMDS submissions to Lear should be made using the following IDs (unless an alternative IMDS Site ID is specified):
  IMDS Site ID: *632* CAMDS Site ID: *CA_3_3087*

3. IMDS Change Management

3.1. The IMDS Change Management rules are outlined in IMDS Rec001. These rules specify the circumstances under which an IMDS must be revised, updated, and resubmitted by a supplier.

3.2. A change in the IMDS needs to be reflected in the Production Part Approval Process (PPAP). Any changes made in the IMDS must be accurately reflected in the PPAP. A new or updated IMDS necessitates a corresponding new or updated PPAP submission.

3.3. No PPAP can be approved unless an IMDS is provided.

LEAR IMDS Change Management with respect to IMDS Recommendation 001:

Relevant Change In GADSL	New Part Number Or New Material	Add Or Delete Material(s)	Relevant Change In Part Mass	Special Requests Related To Law
• Declarable Substance • Prohibited Substance • Customer Specific Requirement (CSR)	• Product Design Change • Product Innovation • New Business Model •Re-PPAP	• Software Change • Customer Specific Requirement (CSR) • Substance Elimination/Substitution	• Product Design Change •Product Innovation	• REACh Sunset Date • ELV Application Code • Customer Specific Requirement (CSR) • Other Related To Law

4. Language

- Reporting in English is preferred.

5. General Structure

5.1. *Node Structure*

- Different type of nodes (component, semi-component, material) should not be placed at the same level, except when the added node (material) is not considered an article itself but is added to an existing article (refer to IMDS Recommendation 001, Rule 4.1.A).
- Pre-cut parts must be declared as components.
- Semi-finished parts that will undergo further processing steps must be declared as semi-components. Examples include leather hide, plated steel, steel coil, etc.

5.2. Masterbatch Structure

- Adhere to the correct masterbatch structure (refer to IMDS Recommendation 001).

5.3. Flat BoM

- Flat BoM reporting is no longer permitted (refer to IMDS Recommendation 001).
- MDSs that contain IMDS019 ZVEI-Rec019 datasheets are no longer acceptable.
- Copying IMDS019 ZVEI-Rec019 datasheets is no longer acceptable.

6. Component/Semi-component Guidelines

6.1. Part/Item No.

- Each MDS must be associated with a specific part number recognized by Lear.
- A new part number requires a new MDS submission.
- Using the Lear Part Number is preferred.

6.2. Part Description/Article Name

- The part description or article name used in an IMDS submission must accurately describe the part and align with customer specifications and drawings.
- Remove “Copy” or “Kopie” from the part description or article name.

6.3. Part Weight

- The weight stated in the MDS must reflect the actual weight of the part. Refer to IMDS Recommendation 001, Rule 4.2.2.A.

6.4. Weight Deviation

- The deviation must not exceed the allowed limit specified in IMDS Recommendation 001, Rule 4.2.2.C.

6.5. Polymeric Parts Marking

- Polymeric parts marking is mandatory and must be accurately indicated as either Yes or Not Applicable. Refer to IMDS Recommendation 001, Rule 4.2.3.A.
- Polymeric parts marking indicated as “No” will be rejected.

6.6. Preliminary MDS

- Preliminary MDS submissions must be answered “No”.

6.7. Application Code

- Refer to IMDS Recommendation 001 4.4.5 Application Codes, Rule 4.4.5.A, Rule 4.4.5.B, Guideline 4.4.5.a.
- Application Code must accurately reflect the material's actual use in the part and be updated as per legal requirements.
- New MDSs must not include outdated application codes.

7. Material Guidelines

7.1. Material MDS (MMDS) by IMDS Steering Committee (IMDS SC)

- The use of applicable IMDS Steering Committee MMDS for metals is preferred instead of creating one's own MMDS. Copying IMDS SC MMDS is not allowed as per IMDS Recommendation 001, Rule 4.4.1.1.

7.2. Material Name

- Material name should be descriptive and not generic or trade name.
- Remove "Copy" or "Kopie" from the Material name.
- Material name should align with its basic substance breakdown.
- Material names may be selected based on existing standards and IMDS Recommendation 001, Rule 4.4.2.C.

7.3. Standard Material Number

- The standard material number must be defined in public standards and is mandatory for parts with weight > 5grams, refer to IMDS Recommendation 001, Rule 4.4.2.E
- This is mandatory for steel and iron materials, copper and copper alloys.
- If there is no standard material number available, type "not available."

7.4. Material Symbol

- Mandatory for the following material classifications:
  - 5.1.a. Filled Thermoplastics
  - 5.1.b Unfilled Thermoplastics
  - 5.2 Thermoplastic Elastomers
  - 5.3 Elastomer/ elastomeric compounds
  - 5.4.1 Polyurethane
  - 5.5.2 Textiles (in polymeric compounds)

7.5. Material Classification

- It is mandatory to select the correct classification for each material

7.6. Material Norms/ Standards

- It is mandatory for materials described in public norms, refer to IMDS Recommendation 001, Rule 4.4.2.H. The industry norms/standards applicable for the material composition must be defined.

7.7. Source of material, including circular materials

- The recyclate content must be indicated as Yes or No.
- For materials with a recyclate content answered as Yes, values will be entered for:
  - Content of inorganic or fossil-based material
  - Content of bio-based material
- A wizard will prompt for the portion of mechanical or chemical recycling content. The respective portion of pre-consumer and post-consumer recyclate can only be entered once the content of mechanical or chemical recycling has been defined.
- The values entered refer to entire material and not only the polymer content. Values must not exceed the allowable limit.

7.8. Portion (Percentage) Ranges

- Refer to IMDS Recommendation 001 4.4.3 Portion (Percentage) Ranges, Rule 4.4.3.A, Rule 4.4.3.B

7.9. Inactivated MDS Module or Material

- Inactivated MDS Module or Material must be replaced with the updated version.
- Deleted MDSs or MDSs containing deactivated substances cannot be used to create new MDSs, as per IMDS Recommendation 001, Guideline 3.2.3.a.

7.10. Liquids and Solvents

- Materials should be reported in their final and cured state unless the liquids or solvents are reported at residual levels.

7.11. Substance breakdown in Material

- Basic or essential substances must be reported.
- A basic substance must be reported in the form as it exists in the material, refer to IMDS Recommendation 001, Rule 4.5.1.A
- Reporting 100% polymer is not allowed, refer to IMDS Recommendation 001, Guideline 4.4.1.a. Additives such as Plasticizers, Phthalates, and others should be disclosed.

7.12. Chemistry Manager

- Materials or Components manufactured or imported into the EU must have information filled in the Regulation wizard.
- Regulatory information can only be provided by the material manufacturer, the company that created the MMDS.
- Product Types must be selected for substances regulated under the Biocidal Product Regulation (BPR), based on the classification of the material containing the substance.

8. Substance Guidelines

8.1. Substance List

- *Lear does not have a specific list of substance of concern but adheres to the Global Automotive Declarable Substance List (GADSL) standard.*

8.2. Inactivated Substances

- Inactivated substances must be replaced with equivalent active substances. Refer to IMDS Recommendation 001, Guideline 3.2.3.a.

8.3. Wildcards and Confidential Substances

- Refer to IMDS Recommendation 001, 4.5.3 Jokers/Wildcards (Highly Confidential Substances).
- The sum of confidential substances, including wildcards for highly confidential substances must not exceed 10 % of a material (refer to IMDS Recommendation 001, Rule 4.5.2.C).
- For masterbatches, Wildcards should not exceed 10% of the total weight of the top-node material.
- The wildcard “not yet specified” is NOT acceptable.

8.4. Substance Range

- Substance ranges must comply with the allowed ranges in IMDS Recommendations 001.

8.5. Prohibited Substances

- MDS containing prohibited substances according to GADSL or CSR beyond threshold limits will be rejected.
- Any presence of Substances of Very High Concern (SVHCs) with an expired Sunset Date according to the EU REACH Authorization List will be automatically rejected.

- Suppliers must refer to the European Union's End of Life Vehicle Directive (ELV 2000/53/EC), Global Automotive Declarable Substances List (GADSL), REACH (the European regulation, Registration, Evaluation, Authorization and Restriction of Chemicals), CSR, and other applicable regulations to identify Substances of Concern.

8.6. Process Chemicals and Gaseous Substances

- In case that the MDS contains process chemicals and gaseous substances, the chemical presence field needs to be filled.

9. OEM accepted MDS

- Directed suppliers by the OEMs must provide Lear with a screenshot of the latest accepted MDS that shows the same IMDS ID that was submitted to the OEMs.
- It is mandatory for the MDS to have been approved by the OEM in the same year it was submitted to Lear.
- If an accepted MDS from the OEM contains a prohibited substance according to GADSL and other applicable legal requirements, the supplier must resubmit the MDS to both the OEM and Lear.

10. Common Lear Rejections

- *Incorrect material classifications*
- *Incorrect material name*
- *Missing material norms / standards*
- *Expired substance Application Code*
- *Incorrect MDS structure (node, masterbatch and material structure)*

11. Substance of Concern Guidelines

11.1. All products must comply with the chemical regulations of the country where the receiving site of Lear Corporation is located.

11.2. GADSL (Global Automotive Declarable Substance List)

Suppliers are obligated to report all substances listed in the Global Automotive Declarable Substance List (GADSL), as well as 100% of the materials contained in the parts, including their material type and weight.

11.3. ELV (End of Life Vehicle) Directive/Regulations

Products supplied to Lear Corporation must adhere to the requirements of the European End of Life Vehicle (ELV) Directive (2000/53/EC) and China ELV Regulations. If a product contains lead, cadmium, mercury, and/or hexavalent chromium, it must have an application code in the Material Data Sheet (MDS) in accordance with ELV Annex II.

11.4. REACH (Registration, Evaluation and Authorization of Chemicals)

Products supplied to Lear Corporation must comply with the requirements of the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) Regulation (*EC 1907/2006)*. Substances listed in REACH Annex XIV are not permitted to be present in Lear products after the sunset date.

11.5. Conflict Minerals (US Dodd-Frank Act Section 1502; EU Regulation No.2017/821)

Suppliers must provide proof of their due diligence activities to ensure that their products do not contain "Conflict Minerals" and disclose the use of minerals originating in the Democratic Republic of the Congo (DRC) and adjoining countries, including Conflict-Affected and High-Risk Areas (CAHRAs). See Lear's Responsible Materials Sourcing Policy.

11.6. RoHS (Restriction of Hazardous Substances in Electrical and Electronic Equipment)

All products with electrical and electronic components, unless explicitly excluded, must comply with the restrictions on the use of substances listed in the RoHS (Restriction of Hazardous Substances in Electrical and Electronic Equipment) Directive *2002/95/EC*. This includes limitations on lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP), and Di isobutyl phthalate (DIBP).

11.7. TSCA (Toxic Substances Control Act of 1976)

The Toxic Substances Control Act (TSCA) of 1976 addresses the production, importation, use, and disposal of specific chemicals, such as polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. Substances listed under TSCA must not be hidden as Joker/Wildcard substances in the MDS reports.

11.8. SCIP (Substance of Concern In articles) (Waste Framework Directive 2008/98/EC)

Articles containing substances of very high concern (SVHCs) from the Candidate List, with a concentration above 0.1% weight by weight (w/w), placed in the EU market from January 5, 2021, must be reported to the European Chemicals Agency (ECHA) via the SCIP database. It is recommended to report the SCIP number assigned to the part in the IMDS.

11.9 Biocidal Product Regulation (BPR) EU 528/2012

The Biocidal Products Regulation (BPR, Regulation (EU) 528/2012) concerns the placing on the market and use of biocidal products, which are used to protect humans, animals, materials or articles against harmful organisms like pests or bacteria, by the action of the active substances contained in the biocidal product. This regulation aims to improve the functioning of the biocidal products market in the EU, while ensuring a high level of protection for humans and the environment

12. Review and update of Lear Requirements:

- To ensure compliance with the latest updates and changes related to IMDS, substances of concern, and customer requirements, the following practices should be followed:

    1. IMDS Releases/Updates: Regularly check the IMDS News webpage at https://public.mdsystem.com/en/web/imds-public-pages/imds-news for annual updates and changes related to IMDS releases and updates. This will help stay informed about any modifications or new features introduced in the IMDS system.

    2. Substances of Concern and Legislation Updates: Conduct an annual review of Substance of Concern or Monitored Substances from sources such as the Global Automotive Declarable Substance List (GADSL), Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) regulations, European End of Life Vehicle (ELV) Directive, and other relevant local legislations. Stay updated

with any changes or additions to these regulations and adjust the compliance requirements accordingly.

3. Customer Specific Requirements (CSR): Regularly review and update CSR documents received from Original Equipment Manufacturers (OEMs).
   Check the IMDS webpage dedicated to OEM-specific information at https://public.mdsystem.com/en/web/imds-public-pages/oem-specific-info for CSR postings. Additionally, if necessary, obtain CSR documents from reliable sources such as https://global.ihs.com/ to ensure compliance with customer-specific requirements.

- By actively monitoring and incorporating these annual updates and changes, you can ensure that your products remain compliant with the latest IMDS regulations, substances of concern, and customer requirements.

References:

IMDS User Manual:
- https://public.mdsystem.com/documents/10906/16811/imds_usermanual_13.2_en.pdf/5a737c0f-3819-8929-cac3-94e7ecefc051?t=1650979884928

All IMDS Recommendations
- https://www.mdsystem.com/imdsnt/faces/login

New to IMDS?
- https://public.mdsystem.com/en/web/imds-public-pages/new2imds

Creating a Material
- https://public.mdsystem.com/documents/10906/16811/IMDS+Create+MDS+tips_Material.pdf/11ee4395-31de-4b44-ae30-6e3b34d2e98d

Creating a Component
- https://public.mdsystem.com/documents/10906/16811/IMDS+Create+MDS+tips_Component.pdf/426cf575-8398-474e-9c62-8f39d7db9b32

Frequently Asked Questions (FAQ):
- https://public.mdsystem.com/en/web/imds-public-pages/faq

OEM Specific Information:
- https://public.mdsystem.com/en/web/imds-public-pages/oem-specific-info

GADSL:
- https://www.gadsl.org/

European ELV Directive
- https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02000L0053-20200306&from=EN

latest version of Annex II
- https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020L0363&from=EN

Technical Support:

If you have specific questions or inquiries regarding Lear's IMDS or CAMDS requirements, you can contact the following mailboxes:

1. Lear IMDS Validation: For questions related to Lear IMDS Validation requirements, you can reach out to IMDSValidation@lear.com.

2. Lear SoC Report: If you have queries specifically related to the SoC (Substance of Concern) Report at Lear, you can contact socreport@lear.com.

For technical assistance or general support regarding the IMDS system, you can refer to the IMDS helpdesk. They can provide you with the necessary technical guidance and support. You can access the IMDS helpdesk through the following link: https://public.mdsystem.com/en/web/imds-public-pages/contact

Change Control:

Initial Release	August 2023