Automotive Industry & REACH
Strategy & Challenges for Authorization

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Numbers and Challenges

9,000
450,000
7
100
8.75 Bn
4.500
10
4
What is a typical product lifecycle?

- **Timeline of the Automotive Production**

  - Development: 4 - 7 years
  - Serial Production: 5 - 8 years
  - Spare Parts availability: 10 - 30 years (after EOP)

Due to long product development time, Industry needs a sound planning basis and legal certainty.

How to avoid that substitutes have to be substituted again (and again)?

- For serial production, Industry needs certainty that harmless substances will not be withdrawn only because REACH makes them unprofitable.

- Due to long time of spare parts availability, Industry needs exemptions for spare parts without retrospective obligations.
How many parts a vehicle contains?

- Depending on the complexity, there are between 4,000 & 9,000 different main components contained in a vehicle platform (without multiple entries for one specific part).
  - e.g. The vehicle platform of one OEM contains 8,400 components (=28,000 incl. common parts) from 1,000 suppliers!
  - Up to 80% of a car are pre-manufactured by supply chain

Total number of components assembled to one vehicle: up to 28,000 (example: 1 tire = 1 part reference number; number of tires per vehicle = 4)
How many parts a vehicle contains?

A car radio is counted as one component...

Considering all parts contained in all components and sub-components, we come to many **tens of thousands** of articles per vehicle!
Other interesting figures...

- How many part numbers a vehicle manufacturer has in its warehouse? **120,000 to 450,000**
- How many parts supplier (Tier 1) does a vehicle manufacturer have? **1,500 to 4,500**
- and how many Tier 2 suppliers the Tier 1 has in average? **500 to 1,500**
- How many suppliers are coming from outside Europe? **20% to 30% (from European Vehicle Manufacturers)**
  **50% to 80% (from non-EU Vehicle Manufacturers)**
- How many levels the supply chain in the Automotive Industry has? **3-5 levels**
How complex is a typical supply chain?

Using this data and adding some conservative assumptions a number of several billion possible Candidate List communications for the tens of thousands of parts per vehicle are possible.
GADSL – Global Automotive Declarable Substance List

www.gadsl.org

Considering the following criteria:

- Substance is to be expected in automobile part or vehicle (NOT in the production process and not outside the Automotive Industry!)
- Substance is regulated or projected to be regulated
- Reportable threshold levels will be based on the lowest level required by regulation or scientific evaluation.
Sector Recommendation to fulfill REACH Art. 33

Since 10 years a standard process within the Automotive Industry

Supply Chain

IMDS Communication of substance information

GADSL * One reference list for declarable substances

* Global Automotive Declarable Substance List:
  - Will contain prohibition for non-authorized uses in the future
  - Some companies are using a different list

Tier 1

IMDS Communication of substance information

GADSL * One reference list for declarable substances

Car Manufacturer

• The whole reporting and analysis is based on CAS numbers
• It therefore is essential, having a definite CAS number description of the CL-substances available (bad example: RCFs on the CL)
IMDS – International Material Data System
A unique success story

Furthermore the IMDS is managing today:
- 228,000 Users
- 33,615,113 Material Data Sheets
- 8,829 Substances reported
Summary of sector recommendation for data collection

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<th>Material Manufacturer</th>
<th>Legal Obligation</th>
<th>Tools</th>
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<td>Material / Preparation</td>
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<td>Electr. Safety Data Sheet transfer (e.g. EDAS/EUPhraC)</td>
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<td>Tier 3 / 4 / 5 / …</td>
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<tr>
<td>Consumer</td>
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OEM specific approaches:
- Use already existing dealer information systems (e.g. electronic parts catalogues)
Sector recommendation to process Safety Data Sheets

**Current standard Process:**

- **Manual SDS Creation**
  - PDF (SDS Format 2006)
  - Excel (SDS Format 2009)
  - Word (SDS Format 2010)
  - Print out (SDS Format Korea)

**Agreed future Process:**

- **Semi Automatic SDS Creation**
  - EDAS (xml)
  - EDAS (xml)
  - EDAS (xml)
  - EDAS (xml)

**Semi Automatic SDS Processing**
- In House Tool or eSDB
- In House Tool (e.g. VW, BMW, Daimler)
- Already existing IHTs can be adjusted with low internal effort.
Article 33 & complex articles

Complex products

Complex supply chain

Complex data collection

100% data completeness is almost impossible?
The first question... How to tame it?
In order to define a common way to REACH compliance, the Automotive Industry joined forces in the Task Force on REACH:
The Automotive Industry Guideline on REACH

→ How to create awareness in the sector?
→ How to give guidance?

The AIG will give answers

Free Download of Version 2.1 under:
http://www.acea.be/reach/

Available languages:
• English (Master)
• German
• French
• Italian
• Japanese
• Korean
• Spanish
• Portuguese
Challenge: Spare parts on stock (for old vehicles)

Unwritten obligation of the Automotive Industry to supply spare parts at least 10 years after the end of vehicle production. However, many parts are stored much longer (>25 years)

In the warehouses of each vehicle manufacturer, each car manufacturer has stored between 120,000 & 450,000 part numbers. These articles are already placed on the market because they left gate of production factory.

These parts where produced and placed on the market according legal requirements relevant at this time!

(Spare) parts produced “today” of course fulfill today's requirements, including communication duties.

According to ECHA, Article 33 is not excluding products, produced long time before REACH entered into force.
Challenge: Spare parts on stock (for old vehicles)

Example

- **Name:** Volkswagen Beetle
- **Surname:** Backup light
- **Born:**
  1970 in Wolfsburg/Germany
- **Place of residence:**
  Volkswagen-Audi Classic Parts Center, Wolfsburg
- **Parents:**
  Defunct
- **Population:**
  6
Challenge: Spare parts on stock (for old vehicles)
Sector Recommendation

Unfortunately,
- many of these parts suppliers don't exist anymore
- information on contained substances only exists sometimes

Due to the unjustifiable costs and efforts and a more then questionable socio economic benefit (anyway rare parts have to be destroyed), physical testing’s have to be avoided!

To support our sector to fulfill the Art. 33 requirement also for spare parts, a FAQ Document has been developed (publication soon).

Basic recommendation:
If there is any indication, that a spare part may contain a Candidate List Substance, then declare it!
Challenge: Used parts & cars

Here, this recommendation does not work!

- The backyard dealer does not know anything about REACH
- The supply- & communication chain never existed!
- How to collect the necessary information?
Automotive Industry requests that under Art 33 only the substances have to be communicated that were legally required at the time of production.
Our way remains challenging…

Thank you for your attention!

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