



ACEA

European
Automobile
Manufacturers
Association

AUTOMOTIVE INDUSTRY QUESTIONS TO THE FORUM

ECHA FORUM'S OPEN SESSION

ACEA

29. October 2020



ACEA'S 16 MEMBERS

**BMW
GROUP**



CNH
INDUSTRIAL

DAF

DAIMLER

Ferrari

FCA

FIAT CHRYSLER AUTOMOBILES



HONDA
The Power of Dreams

 **HYUNDAI**



PSA
GROUPE

**GROUPE
RENAULT**

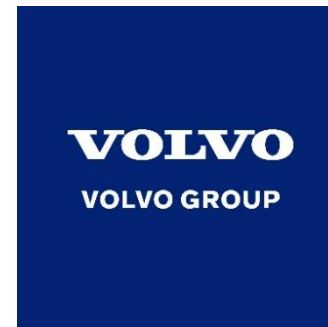
TOYOTA

VOLKSWAGEN
AKTIENGESELLSCHAFT





COMMERCIAL VEHICLE MEMBERS





LIGHT COMMERCIAL VEHICLE MEMBERS

DAIMLER

FCA
FIAT CHRYSLER AUTOMOBILES



IVECO

PSA
GROUPE

**GROUPE
RENAULT**

TOYOTA

VOLKSWAGEN
AKTIENGESELLSCHAFT



BUS AND COACH MEMBERS

DAIMLER

IVECO



VOLVO
VOLVO GROUP

KEY FIGURES ABOUT THE INDUSTRY

- **14.6 million Europeans** work in the automotive sector
- **11.5% of all manufacturing jobs** in the EU
- **€440.4 billion in taxes** in major European markets
- **€74 billion trade surplus** for the EU
- **7% of EU GDP** generated by the auto industry
- **€60.9 billion in R&D** spending, 29% of EU total

- **POP Regulation – PFOA Amendment:**

- How to enforce the restriction if there is no harmonized interpretation of the legal requirement?

- **Formaldehyde Restriction:**

- Many industries including the automotive industry value chain are concerned about the way to prove compliance of smaller individual parts. Indeed the currently referenced standard is not fit for purpose and any correlation between this and other standards currently applied is considered to be impossible. How to prove compliance under these conditions?

- **SCIP:**

- For various reasons, major parts of industry still struggle with the tight schedule by January 2021. When will the enforcement start?

- **CAS numbers:**

- There is often not an exhaustive list of cas numbers applicable to compliance of restrictions, authorizations, Article 33; and related obligations such as SCIP. This is very challenging for duty holders. How is the enforcement taking consideration of that issue?

- **SDS:**

- ACEA volunteered to check best practice SDS provided by other industrial associations and never got any feedback from the Forum. What is the status of ECHA's Forum Joint Initiative on improvement of the quality of Safety Data Sheets?

POP REGULATION: PFOA AMENDMENT

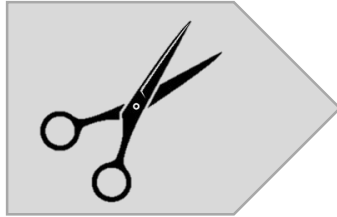
Confusion 1: Storage

- Is storage finally considered to be a use?
- Can stored materials and articles still be used to manufacture complex objects?

Confusion 2: Article or New Article



Article!



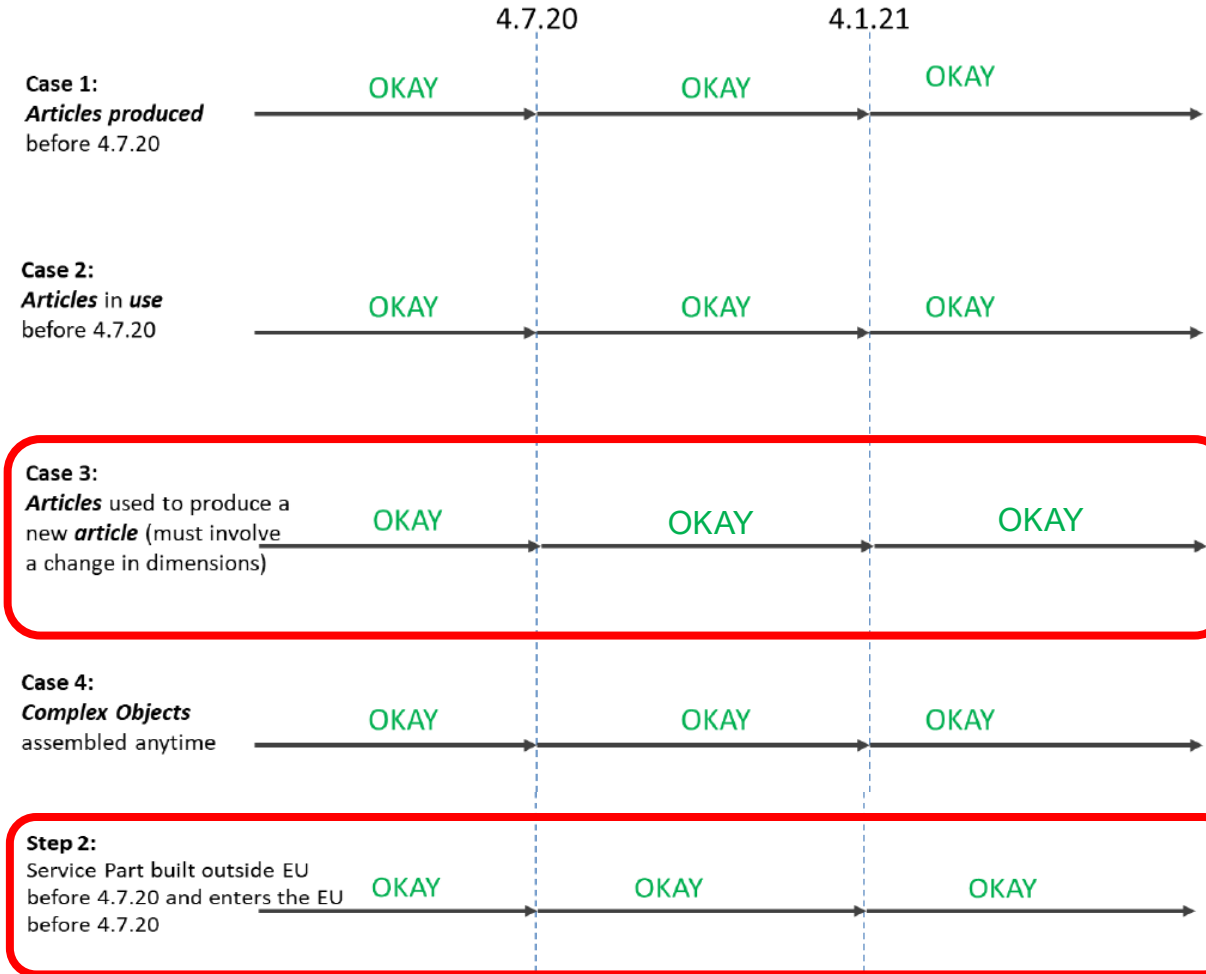
New Article?

- Is the membrane still the same article as the textile?



- No harmonized interpretation
- Large confusion in industry

For Parts Produced in the EU, Placing on the market is...



REACH FORMALDEHYDE RESTRICTION

“Many industries including the automotive industry value chain are concerned about the way to prove compliance of smaller individual parts. Indeed the currently referenced standard is not fit for purpose and any correlation between this and other standards currently applied is considered to be impossible. How to prove compliance under these conditions?”

Background / current situation :

- **The SEAC restriction wording proposal is well reflecting and recognized our current automotive voluntary approach that means :**
 - having a concentration limit only applicable to interior air cabin level
 - concentration limit of 0.1 mg/m³ tested according our ISO 12219-1 in ambient mode (as mentioned in the appendix X).
 - ➔ This situation is really appreciated by our industry
 - ➔ Any other approach applicable to components based on other standards than those developed specifically and used by automotive industry would not make sense and would not have any relevance / benefit
 - **This global automotive approach includes specific automotive specification/testing approach at material and component level**
 - ➔ all materials and components including spare parts and accessories subject to this specific automotive specification/testing approach are covered by this automotive approach finally concluded by the Air interior Cabin test according our ISO 12219-1 in ambient mode.
- ➔ **The way to prove compliance for Vehicle / all components covered by this approach sounds clear.**

Our concern : open point?

- This concerns components mainly intended to aftermarket not under OEM design control and produced by sub-parties (not OEM and tier suppliers) ➔ not covered by the global automotive approach
 - For those components (and particularly for small components), currently referenced standard in Annex X of this restriction is not fit for purpose for those components and any correlation between standards currently mentioned in Annex X and other standards currently applied is considered to be impossible.
- ➔ **In this context, how to prove compliance for such components ? Our proposal : tests based on ISO 12219 standards and results correlated with our whole vehicle approach rather than EN 717-1**

SCIP DATA REQUIREMENTS

- “Relevant mandatory information” going far beyond Art 33:

Concern element	
Candidate List substance	✓
Concentration range	✗
Candidate List version	✗
Material category	✗
Mixture category (EuPCS)	✗
Safe use information	
Safe use instruction text	✓
Flag “No need to provide safe use information [...]”	✓

Article identification	
Article name	✓
Primary article identifier	✗
Article category (CN/TARIC code)	✗
Production in European Union	✗
Linked article	✗
Number of units	✗

✓ Required according to WFD, Art 9 & Art 33
 ✗ NOT required to fulfill according to WFD, Art 9 & Art 33
 abc Recently announced deletions in the SCIP design
 abc Recently announced changes in the SCIP design

- and are not readily available at industry

– Collections can take years, depending on the sector and the product

Very high costs - Calculation of SCIP Notifications per year

Supplier Reporting

OEM Reporting

Assumption 1+2

100.000 entries per car model type (3% → 7% parts containing SVHCs)



Assumption 3

900 model types in the EU



Assumption 4

Same article has to be notified by each tier in the supply chain (1.5 → 4x)



Assumption 5

CL update 2x/year: requires a new reporting and ID for 30% of the products



Assumption 6

Spare parts notification: → All spare parts have different part numbers then serial parts → 20 % more spare parts than serial parts (Because of legacy spare parts)



Assumption 7

20 million vehicles manufactured in EU



► **SCIP Notifications in the 1st year**

Optimistic assumption:
Conservative assumption:
 Realistic assumption:

6.5 Mio
92.1 Mio
 25.7 Mio

► ~29,500 / Day
~418,500 / Day
 ~117,000 / Day

Calculation of the related costs & FTEs

Assumption 8

Time consumption for each notification (10 – 60 min)



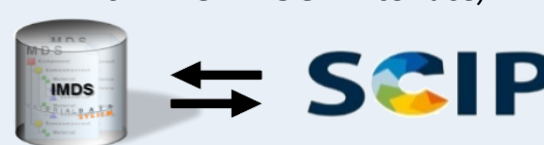
Assumption 9

Labor cost / FTEs (50 – 60 €/h)



Assumption 10+11+12+13

Cost for IMDS system (incl. cost for data collection, maintenance, in-house systems & IMDS <-> SCIP interface)



Assumption 14

Internal SCIP administration costs (In-house system admin, organization setup)



► **Total effort for the EU automobile industrie**

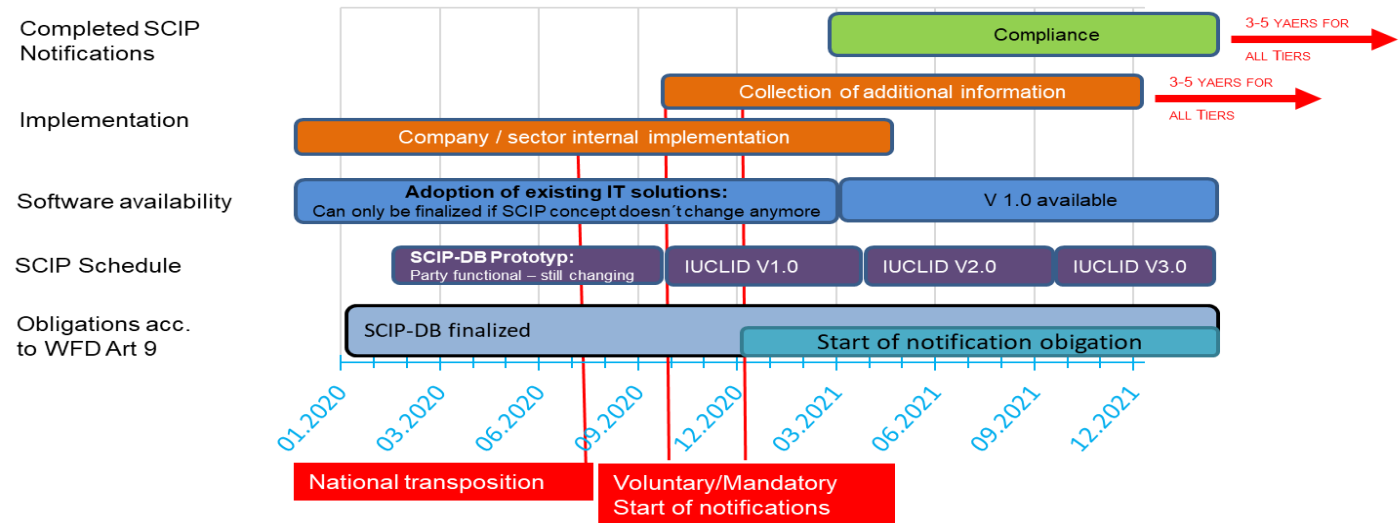
Optimistic assumption : €801 Mio
Conservative assumption : €8.5 Billion
 Realistic assumption : €1.9 Billion

► 600 FTEs
52,000 FTEs
 4,900 FTEs

POSTPONEMENT REQUIRED

- The Automotive Industry systems will be ready earliest in March 2021
- Afterwards all additional data needs to be collected which can take years
- The WFD SCIP deadline should be delayed by at least one year.
 - The mandatory SCIP data fields are far beyond the legal requirements of Art 33 and the required information therefore is not readily available at industry and needs years to be collected.
 - The SCIP developments are still not finalized by ECHA and therefore industry cannot start with the required large-scale implementations in IT and processes without risking costly changes.
 - The urgently required economic recovery

If enforcements starts in Jan 2021 not only the Auto industry is at risk to be incompliant!



INSUFFICIENT UNIQUE IDENTIFIERS FOR SUBSTANCES

Issue:

- EU POP, Candidate List, Annex XIV & Annex XVII etc. are very often focused on substance groups such as 4-nonylphenol-ethoxylates, PFOA or organotin compounds
- ECHA does not provide exhaustive and legally binding lists of identifiers such as CAS or EINECS numbers of those groups

Example:

- There is a pick list of about 200+ individual CAS numbers in the SCIP database
- However ACEA TF REACH has identified 400+ individual CAS numbers which can be considered as SVHC
- Substances which clearly fall under the definition of SVHC **cannot** be reported to SCIP - compliance ?

Request to the ECHA forum:

- ✓ Provide legally binding lists of identifiers of substances which are in scope of relevant entries of the legislations affected
- ✓ Provide chemical service to **quickly** decide whether or not a certain substance is in scope or not
- ✓ Regularly update lists like SCIP pick list, Candidate List, Annex XIV, Annex XVII, EU POP etc.

ECHA ASO ON IMPROVEMENT OF THE QUALITY OF SDS

Joint initiative ECHA Forum – ECHA ASO on Improvement of the quality of SDS

Background / current situation :

- ECHA FORUM published report on SDS quality and invited ASOs to discuss the results within a joint initiative at Helsinki in order to identify activities to improve the SDS content quality.



- Within this ASO joint initiative ACEA volunteered to check best practice SDS provided by other industrial associations but never got any feedback from the Forum.

→ Open questions?

- What is the status of ECHA's Forum Joint Initiative on improvement of the quality of Safety Data Sheets?
- ACEA proposed as path forward to create a best practice SDS together with the EuPhraC WG (based on the actual EuPhraC SDS template).



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Association

ACEA represents the 16 major Europe-based
car, van, truck and bus manufacturers

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EMPLOYMENT

Manufacturing of motor vehicles (EU)	2.7 million people = 8.5% of EU employment in manufacturing	2018
Total (EU manufacturing, services and construction)	14.6 million people = 6.7% of total EU employment	2018

PRODUCTION

Motor vehicles (world)	92.8 million units	2019
Motor vehicles (EU)	18.5 million units = 20% of global motor vehicle production	2019
Passenger cars (world)	74.2 million units	2019
Passenger cars (EU)	15.8 million units = 21% of global passenger car production	2019

REGISTRATIONS

Motor vehicles (world)	93.3 million units	2019
Motor vehicles (EU)	17.9 million units = 19% of global motor vehicle registrations/sales	2019
Passenger cars (world)	74.9 million units	2019
Passenger cars (EU)	15.3 million units = 20% of global passenger car registrations/sales	2019
Petrol (EU)	58.9% market share	2019
Diesel (EU)	30.5% market share	2019
Electrically-chargeable (EU)	3.0% market share	2019

TRADE

Motor vehicle exports (extra-EU)	€135.9 billion	2019
Motor vehicle imports (extra-EU)	€62.0 billion	2019
Trade surplus	€73.9 billion	2019

VEHICLES IN USE

Motor vehicles (EU)	312.7 million units	2018
Passenger cars (EU)	271.5 million units	2018
Motorisation rate (EU)	610 vehicles per 1,000 inhabitants	2018
Average age of cars (EU)	10.8 years	2018

ROAD SAFETY

Road fatalities (EU)	48 people per million inhabitants	2019
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ENVIRONMENT

Average CO2 emissions new cars (EU)	123g CO2/km	2019
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INNOVATION

Automotive R&D investment	€60.9 billion	2018
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TAXATION

Fiscal income from motor vehicles	€440.4 billion	2019
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