

iPCA/CSI

Compliance Substance Inspector

Available CSI Checking Rule groups

Version: 2.3 Date: 2011/08/25

iPoint-systems gmbh

Ludwig-Erhard-Str. 52-56
72760 Reutlingen

Tel. +49 (7121) 44 89-60
Fax. +49 (7121) 44 89-89
info@ipoint-systems.de
www.ipoint-systems.de

Geschäftsführer
Jörg Walden & Francisco Benito
Handelsregister
HRB 353830

Amtsgericht Stuttgart
USt.-Id.Nr. DE 813135964

IMPRINT

This document is part of the product iPoint Compliance Agent.

All rights, also of translation, are reserved.

Parts of this document may not be reproduced in any form by any means without prior written authorization by iPoint-systems gmbh.

The distribution to users of the product family iPoint Compliance Agent within the organization which holds a license of it is exempted.

With expiring of the license all existing copies of this document have to be deleted.

iPoint-systems gmbh assumes no responsibility for consequential damage resulting from the use.

All product names mentioned herein are the trademarks of their respective owners.

Copyright © 2011 by iPoint-system gmbh, Reutlingen

iPoint systems gmbh
Ludwig-Erhard-Str. 52-56
D-72760 Reutlingen

Phone: +49 (7121) 14489 – 60
Fax: +49 (7121) 14489 – 89

SUMMARY

1	PREFACE	4
2	AVAILABLE RULE GROUPS	5
2.1	Rule groups for legal regulations	5
2.1.1	EU-ELV	5
2.1.2	EU-RoHS.....	5
2.2	Companies/organizations specific rule groups	5
2.2.1	GADSL	5
2.2.2	Ford RSMS.....	6
2.2.3	GMW3059.....	6
2.2.4	PSA MACSI.....	6
2.3	SVHC rule groups for REACH Compliance	6
2.3.1	SVHC Complete part	7
2.3.2	SVHC each level	7
2.3.3	SVHC mixtures	7
2.4	Further REACH Compliance rule groups	7
2.4.1	Substances with no LR (Lead Registrant).....	7
2.4.2	REACH Annex XVII.....	7
2.4.3	REACH Annex XIV	7
2.4.4	CMR 1 & 2.....	7
3	INSTALLATION AND UPDATES OF RULE GROUPS	9
4	CHANGE HISTORY	10

I Preface

This document describes the rule groups for checking MDS with the iPCA/CSI module available by iPoint

It does not include the instructions for the creation and use of the rule groups using iPoint Compliance Agent. For this please refer to the separate user documentation on how to create IHS substances under chapter 23 in iPCA/IHS user manual and how to edit and use substance groups, rules and rule groups – see iPCA/CSI user manual.

2 Available rule groups

The existing rule groups can be displayed in iPCA/IHS by selecting **Menu → Extras → CSI Management**, tab **Rule Groups**.

The Short name describes the common description of the rule group which is used for further revision/adaption of the concerned rule group to a new directive/recommendation. These revisions are expressed by the version number.

An extended description (e.g. the exact EU directives) with the effective valid identification/the actual state is provided by the Origin name.

It is recommended to use always the most recent version of a rule group for checking a MDS because data which were created before the official release of that version have to be compliant also with these new recommendations (e.g. ELV directives).

2.1 Rule groups for legal regulations

2.1.1 EU-ELV

This rule group includes all exemptions of the EU End-of-Life Directive 2000/53/EC, which are regulated in Annex II, please refer to <http://eur-lex.europa.eu>.

2.1.2 EU-RoHS

These are all exemptions to the EU ROHS Directive 2002/95/EC, which are regulated in the change of Annex I as Directive 2008/385/EC, cf. <http://eur-lex.europa.eu>.

2.2 Companies/organizations specific rule groups

2.2.1 GADSL

The GADSL list is provided and available by the GADSL (www.gadsl.org). This list is a common substance list for the automotive industry. The GADSL list covers the substance information in parts/components and materials along the supply chain. This substance information is required in both the production of materials/components and vehicle construction, especially during their use, the reuse, recycling and waste management.

The intention of the GADSL Organization is that the GADSL list becomes a general substance list for the declaration of component and material compositions within the automotive industry. The GADSL list includes only those substances existing in material of the end-components and in vehicles at the time of sale and which should be declared or prohibited.

However, only 30% (809 of 2765 basic substances) of the GADSL entire list are integrated in the IMDS basic substance folder.

The GADSL rule group covers all basic substances available in IMDS and checks only those basic substances that are marked as "P" (= prohibited) under consideration of the threshold given in the GADSL list (however such labeling is not always in concordance with the legal demands) or that contain an application exemption or a statutory prohibition of application etc.. These statutory exemption or prohibition does not always apply for Automotive.

In defining the rules corresponding by law to both, the limit value of the control threshold value is the value for the general rule and the limit value for the control threshold value of the exemption from the GADSL list.

2.2.2 Ford RSMS

The company Ford provides its own set of rules for acceptance of a MDS, cf.

http://mdsystem.com/html/en/home_en.html.

The main differences to GADSL are:

- The RSMS P/D-labeling is different to that of the GADSL, e.g. PAH (polycyclic aromatic hydrocarbons) in RSMS is „P“, in GADSL it is „D“.
- RSMS basic substances contain no CAS No. and the substance name is not always identical to GADSL.
- The thresholds are not always equal to the requirements given by law or by GADSL.
- The “Effective Date” (due date) is different.
- The application exemption/ban is different.

2.2.3 GMW3059

The company GM provides its own set of rules for acceptance of a MDS.

The main differences to GADSL are:

- The GMW3059 P/D-labeling is different to that of the GADSL, e.g. PAH (polycyclic aromatic hydrocarbons) in GMW3059 is „P“, in GADSL it is „D“.
- GMW3059 basic substances contain no CAS No. and the substance name is not always identical to GADSL.
- The thresholds are not always equal to the requirements given by law or by GADSL.
- The “Effective Date” (due date) is different.
- The application exemption/ban is different.

2.2.4 PSA MACSI

These rule groups can be used for checking IMDS MDS before converting to MACSI MDS and check the IMDS MDS if they are compliant with PSA specific requirements for MACSI.

The following rule groups are available which check materials of corresponding classifications for fillers which have to be declared in MACSI:

- MACSI 2010 Filler Thermoplast
- MACSI 2010 Filler Duromers
- MACSI 2010 Filler Elastomer
- MACSI 2010 (Modified Organic Natural Materials)

Following rule group checks for ELV exemptions according to the MACSI requirements:

- MACSI 2010 Annex II Exemptions

2.3 SVHC rule groups for REACH Compliance

This set of rule groups includes two different ECHA lists which are reflected in the substance groups which are assigned to the used rules:

- ECHA-Recommendation list, shown in the basic substance group “SVHC ECHA Recommendation”
- ECHA-Candidate list with the remaining substances, as shown in the basic substance group “SVHC Candidate List (without ECHA Recommendation substances)”.

Those rule groups usually consist of two rules: the first one with an error message applies to the SVHC pure substances that ECHA has recommended to the EU Commission for inclusion into Annex XIV. The second rule

with an error message applies to the remaining SVHC substances from the current candidate list. (without SVHC from ECHA Recommendation or Prioritization List) and the list of previous candidates (without SVHC from ECHA Recommendation or Prioritization List).

The additions of the module SAM-M (identified by the suffix “(SAM-M)”) include all substances for the corresponding current ECHA list.

2.3.1 SVHC Complete part

This rule group checks only the complete part (regarding the top level node) and uses the SVHC substances of the respective current „Candidate List of Substances of Very High Concern for Authorisation“.

2.3.2 SVHC each level

This rule group checks substances within each level (regarding each part node) and uses the SVHC substances of the respective current “Candidate List of Substances of Very High Concern for Authorisation“.

2.3.3 SVHC mixtures

This rule group checks if any mixture contains substances of the ECHA Candidate List.

2.4 Further REACH Compliance rule groups

2.4.1 Substances with no LR (Lead Registrant)

This rule group checks which basic substances with an ECHA registration date of 2010/11/30 are already reported with a Lead Registrant (LR) to ECHA. Basic substances with a LR will be registered in time. It is expected that substances without LR will not be registered in time.

ECHA recommends all Downstream Users (DU) to check whether their basic substances will all be registered in time to become compliant with REACH.

If any substances do not contain a LR, the DU should contact:

1. His suppliers asking if the substances will be registered in time
2. ECHA (informing about EC number and name)

2.4.2 REACH Annex XVII

This rule group checks Annex XVII restrictions to comply with the restrictions and prohibitions on certain dangerous, hazardous substances and mixtures.

2.4.3 REACH Annex XIV

This rule group checks Annex XIV requirements in order to comply with the timeline – last usage and sunset time – for ECHA Authorisation of certain SVHC substances.

2.4.4 CMR I & 2

This rule group checks substances that are listed in Annex VI, harmonized according to their hazardous potential, as CMR substances of category 1+2 (carcinogenic, mutagenic, toxic to reproduction; in Germany according to

GefStoffV also known as “KMR”) and that are contained in mixtures and articles with a concentration more than 0.1% w/w.

The EU legislation concerning hazardous substances is based on the CLP Regulation 1272 / 2008 / 1272 on classification, labeling and packaging of substances and mixtures, and repealing Directive 67 / 548 / EEC and 1999 / 45 / §G and amending Regulation (EC) REACH 1907 / 2006.

3 Installation and Updates of rule groups

When you install new or update an existing rule group all necessary master data will be also rolled out (e.g. user IHS substance groups).

If the module USC is licensed this rule groups will be available also for the USC check configuration in an own tab "CSI checks".

Once delivered IHS substance groups will not be changed. If there is any amendment to an existing rule group regarding basic substance groups then a new rule group includes a new substance group which is only used by this new rule group.

The composition of IMDS basic substance groups will be administered by the daily download.

After loading of a new version of an existing rule group or its replacement by a new rule group, be aware of the following steps:

- If the new rule group requires further IHS basic substances then these need to be created manually and inserted into the corresponding substance group.
Which IHS substances are concerned will be given as information with the update instructions.
- To avoid the use of old rule groups for the CSI checks these old rule groups should be deactivated in the CSI management. Thus, the rule groups internally still exist but they cannot be searched for (except with the search criterion "Show Deleted") and are no more available for the CSI checks.
- If the module USC is licensed then the check configuration for USC Inbox check has to be adapted in the tab CSI checks, i.e.
 - The previously configured rule groups should be set to „Manual/No check“, depending on whether the old group should be checked or not.
 - The new rule groups must be activated if incoming MDS should be checked against those new groups, i.e. they should be set to "Precheck/Manual check".

4 Change History

Version	Date	Description
1.0	2009/09/10	Initial
2.0	2010/01/26	Changes for ELV EU-2008/689/EC, GADSL 2009, Ford RSMS-2009
2.1	2010/02/02	Adding of new SVHC rule groups
2.2	2010/12/22	Update: ELV, GADSL, Ford RSMS, SVHC New: SVHC mixtures, MACSI, Substances with no LR, REACH Annex XVII, REACH Annex XIV, CMR 1&2
2.3	2011/08/25	Review of chapters