

Prohibition and declaration of substances

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Valid for	SEG Automotive
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Binding due to	CDEN 00131
Recommended for	No central agreement
Disclosure	Restricted in accordance with CDET-00004-SEG Automotive Ethics and Business Conduct Guidelines

This Norm is binding for suppliers if it is part of the order.

1 Scope

SEG-Norm N 2580-1 regulates the use of harmful substances which shall not, or only within limitations, occur in or on materials (definition, see section 3) supplied to SEG. It helps to implement legal requirements and the requirements of SEG customers.

2 General

This standard does not absolve the supplier from his own responsibility to meet legislation and regulations in force.

The supplier is obligated to immediately contact the responsible SEG purchase department in writing if the legal substance and material regulations, other legal requirements or contractual agreements with SEG in respect to the specific product composition are not fulfilled or are not applied and implemented due to other reasons.

SEG is authorized to adapt this Norm and to replace it with a new version. All products supplied to SEG must comply with the latest version of this standard, regardless of when they were originally approved. The information is available at [1].

3 Definitions

Term	Definition
IMDS	International Material Data System
CAMDS	China Automotive Material Data System
MDS	Material Data Sheet
PPAP	Production Part Approval Process
REACH	Regulation on the Registration, Evaluation, Authorisation and Restriction of Chemicals
SoC	Substances of Concern
SVHC	Substances of Very High Concern
SCIP database	Data System for SVHC in articles as such or in complex products according to EU Waste Framework Directive
ELV	Directive on End of Life Vehicle
RoHS	Restriction of Hazardous Substances
GADSL	Global Automotive Declarable Substances List
POP	Persistent organic pollutants

Term	Definition
Material	Material in terms of this SEG-Norm is everything that remains in an SEG product, all that is used by SEG as auxiliary manufacturing material, and all that SEG passes on to external customers as complete product, component and packaging. Examples of material: • complete product including merchandise • component • semi-finished part • material • preparation or mixture • pure substance • soldering material • adhesive • lubricant • surface degreasing agent • anticorrosive agent • material for hardening • material for forming processes • packaging including conditioning such as desiccants or anticorrosive agents
Homogenous material (according to EU-RoHS)	Means one material of uniform composition throughout or a material, consisting of a combination of materials, that cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes.

4 Requirements

4.1 Trigger for a declaration

Declaration by the supplier is required if at least one of the following triggering factors exists. After the triggering factor becomes known the declaration by the supplier to the responsible SEG purchasing authority needs to be made immediately.

- A material is sampled, placed on the market or delivered for the first time.
- No declaration was available so far for whatever reason, e.g. not yet required, but the product is still being supplied or was supplied to SEG.
- The previous declaration was incorrect or incomplete. In this case, the supplier is obliged to submit a corrected version immediately if requested by SEG. This obligation shall also apply if the supplier becomes aware of an error in the declaration from a source other than SEG.
- The material or substance has been changed.
- The material is affected by new substance prohibitions and/or declaration obligations. Joker/wildcard/confidential substances shall be reviewed as well.
- Changes in the weight of the delivered material exceed the agreed weight tolerances.
- There is an individual request.
- In all cases a declaration is legally required.

4.2 Declaration format

4.2.1 IMDS/CAMDS

International Material Data System is a web-based tool of the automotive industry, utilized to communicate material composition data of products in form of Material Data Sheets along the supply chain.

CAMDS is the chinese data management platform for automotive industry.

For all components and materials used in the production of vehicles and incorporated in the vehicle, the above-mentioned declaration formats shall be applied.

Submission of a Material Data Sheet is typically part of the PPAP, therefore suppliers are obliged to provide it to SEG via

- IMDS
- CAMDS (can be requested in addition to IMDS datasheet and only for China) system.

Based on customer requirements an earlier sending might be necessary, this requirement is always defined in the project.

In general Material Data Sheets must comply with IMDS recommendation 001, all the valid annexes [2] and the SEG supplier guidelines [3].

Below we would like to draw the attention of suppliers to some important aspects to be considered when preparing MDSs:

- IMDS Data is used to prove legal compliance. Suppliers are responsible for the accuracy of the data they provide.
- All paints, polymers, sealants, adhesives etc., shall be reported in their cured state.
- Submission of a mixture/ compound composition report must list all chemical ingredients present above 0.1 % w/w unless substances are reportable at levels below 0.1 % specified by applicable legal requirements (normally these are shown also in GADSL).

4.2.2 Other declaration types

When delivering indirect material (e.g. substances, mixtures, auxiliary materials) which do not remain in the final product, minimum a safety data sheet must be submitted.

Additional definition might be necessary based on legal requirements or on request from SEG.

4.3 Substance requirements

4.3.1 General substance requirements

The following requirements apply in general for declaration of materials delivered to SEG.

- If no limit value is specified, the value of 0,1% mass fraction applies.
- If limit values are listed for material groups, the supplier must list the respective individual materials.
- For auxiliary manufacturing materials and packaging the limit value refers to the delivery condition.

Depending on the regulation, the limit value can refer to the following:

- the supplied product/article (see section 4.4.1 REACH)
- the material
- the mixture
- the homogeneous material

Explanation of the homogeneous material on the example of a screw:

The screw consists of e.g. the metal body and several coatings (e.g. a zinc coating, a passivation layer, further coatings, if required). These individual coatings are each considered to be homogeneous materials, if the coatings can be separated mechanically.

If the surface roughness is greater than the coating thickness of one or several coatings, these can no longer be separated mechanically. In these cases, these coatings have to be considered as one homogeneous material.

All other coatings, which do not fulfil this condition, have to be considered as separate homogeneous materials, respectively.

This example only serves as an explanation. It is not to be understood as a (binding) representation of the legal situation. The supplier has to check the legal framework conditions always on his own responsibility.

4.3.2 Restricted substances

Every supplier has its own responsibility to be compliant with existing legislation and regulations in force for every material delivered to SEG. It is necessary to check whether trade sector-, country- or regional specific regulations exist for the relevant product.

One main topic of material compliance is the compliance with substance requirements for declarable and prohibited substances, the so called SoC or SVHC.

All prohibited or declarable substances contained in a material have to be declared without exemption (e.g. know-how reason) by the supplier. Contractually agreed further-reaching requirements, e.g. by IMDS, have to be complied with.

For SEG general important legal requirements regarding SoC/ SVHC are:

- The EU-REACH Regulation (Registration, Evaluation, Authorisation and Restriction of Chemicals, 1907/2006/EG)
- The EU-ELV (Directive on End-of-Life Vehicle, 2000/53/EG)
- The CN-ELV (GB/T 19515-2015)
- The EU-RoHS (Restriction of Hazardous Substances, Directive 2011/65/EC)
- EU-POP (2019/1021/EC) / Stockholm Convention
- GADSL: from automotive industry set up list as an international corporate list for SoC.
- Depending on the product type:
 - Ship Recycling and Amending Regulation (EU) (1257/2013),
 - Battery Regulation (2023/1542/EC),
 - Regulation on Machinery (2023/1230/EC)

Declarable Substances: Declarable substances are marked with "D" (Declaration) in regulations or in annex A of this norm. The concentration of the substance has to be declared, if it reaches the limit value or if the limit value is exceeded. The declaration of the concentration is recommended if it is below or equal to the limit value.

Prohibited substances: Prohibited substances are marked with "P" (Prohibition) in regulations or in annex A of this norm. They must not be included in the supplied material with a concentration equal to the limit value or above the limit value. A concentration value has always to be specified, even if the concentration of the substance lies below the limit value or reaches the same.

4.4 Regulations

In this section the most important legal requirements for SEG are listed. Please be aware that always the latest version of the legislation should be considered as valid and to be complied with. This list is not exhaustive and does not release any supplier from its legal obligations and from compliance with other applicable legislations. Each law defines specific thresholds for the restricted substances. The supplier must always comply with the requirements currently in force.

4.4.1 EU-REACH Regulation

REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals.

This regulation establishes specific requirements to the production, import and transport of substances by themselves and substances contained in mixtures and products. Manufacturers and importers are required to gather information on the properties of their chemical substances and to register that information in a central database in the European Chemical Agency (ECHA).

Definition of article: Under REACH some substance thresholds are defined not on the homogenous material, but on the article level. REACH defines an article as an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition. e.g. a coating material itself is not an article, but a screw is.

Below we would like to highlight some important obligations under EU-REACH.

- Declaration requirements for substances of the candidate list
- Declaration requirements for substances and mixtures with safety data sheet

- Obligation to approve substances according to Annex XIV, which are used for production in Europe
 - The supplier has to inform the SEG contact at least two years before "Sunset date" if such a substance is in use in Europe.
- Prohibition and restrictions of substances according to Annex XVII
- Registration of substances when imported into the European Union
 - Suppliers established outside the European Union have to appoint a natural or legal person within the European Union who will act as a deputy to fulfill the import obligation.
- The supplier has to be compliant with the notification requirements of REACH. (Notification to ECHA is necessary if substance defined as SVHC and >0.1% present in single part and used >1t/year/legal entity and not registered for use, within 6 months after inclusion in candidate list) [4]

4.4.1.1 Candidate list substances

Substances fulfilling one or more of the criteria defined in Article 57 of the EU-REACH Regulation can be identified as "Substances of Very High Concern" (SVHC) and put on the "Candidate List for Authorization".

The inclusion in the Candidate List brings immediate obligations for suppliers of the substance, such as:

- supplying a safety data sheet
- communicating on safe use
- responding to consumer requests within 45 days and
- notifying ECHA if the article they produce contains an SVHC in quantities above one tonne per producer/importer per year and if the substance is present in those articles above a concentration of 0.1% (w/w). [5]

4.4.2 SCIP

The revised European Waste Frame Directive and related local transpositions expands your existing obligation to notify SEG for products containing SVHC's as described in 4.4.1 of this norm.

From January 5, 2021 onwards, you should also supply this information to the European Chemical Agency via the SCIP database. [6]

4.4.3 ELV

4.4.3.1 EU-ELV Directive

The EU-ELV Directive sets clear targets for end-of-life vehicles and their components. It also prohibits the use of hazardous substances when manufacturing new vehicles (especially lead, mercury, cadmium and hexavalent chromium) except in defined exemptions when there are no adequate alternatives. [7]

4.4.3.2 China-ELV

China-ELV regulates the use of specific hazardous substances in automobile products or components which are sold in China.

Please be aware that the defined restrictions can differ from the EU-ELV (e.g., scope, substances, thresholds, exemption list). The actual requirements can be found on [8]

4.4.4 EU-RoHS Directive

The RoHS Directive currently restricts the use of ten substances: lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP).

All products with an electrical and electronic component, unless specifically excluded, have to comply with these restrictions. [9]

4.4.5 EU-POP Regulation

Persistent organic pollutants (POPs) are organic substances that persist in the environment, accumulate in living organisms and pose a risk to our health and the environment. POPs are regulated worldwide by the Stockholm Convention and in the European Union by the POPs Regulation.

The POPs Regulation aims to protect human health and the environment with specific control measures that:

- prohibit or severely restrict the production, placing on the market and use of POPs;
- minimise the environmental release of POPs that are formed as industrial by-products;
- make sure that stockpiles of restricted POPs are safely managed; and
- ensure the environmentally sound disposal of waste consisting of, or contaminated by POPs. [10]

4.4.6 California Proposition 65 Regulation

California Proposition 65 requires businesses to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm. The actual list of substances can be found on [11]

4.4.7 Ship Recycling and Amending Regulation

This regulation aims to prevent, reduce and minimise accidents, injuries and other negative effects on human health and the environment when ships are recycled and the hazardous waste they contain is removed. Every new ship has to have on board an inventory of the hazardous materials (such as asbestos, lead or mercury) it contains in either its structure or equipment. The use of certain hazardous materials is forbidden.[12]

4.4.8 GADSL

A substance list that is defined by the Global Automotive Stakeholders Group (GASG) organized by the automotive manufacturer, automotive parts supplier (tier supplier) and chemical/plastics industries. This list only covers the substances that are expected to be present in a material or part that remains in the vehicle or part at the point of sale.

The list of the substances in the GADSL is available on the website [13].

4.4.9 EU-Battery Regulation

The aim of this EU regulation is ensuring that batteries placed on the EU market are sustainable and circular throughout their whole life cycle. [14]

4.4.10 EU-Machinery Regulation

This regulation defines the mandatory essential health and safety requirements that machinery products must fulfil to be placed on the European market. These requirements are aimed at machinery manufacturers and other economic operators such as importers. Vehicles, including e-bikes, e-scooters and other personal mobility devices that are not subject to EU type approval are covered by this Regulation.

Some SEG products fall under the scope the Machinery regulation, in such a case the requirements named on [15] shall be considered. The scope will be typically defined in the project phase.

5 Normative references

The following documents are applicable in addition to this SEG-Norm.

With dated references solely the edition referred to applies.

With undated references the last edition of the indicated document applies (including all revisions). Intentionally cited historical standards are additionally identified as „Type H“.

No.	Document number (edition date)	Title of reference	Type ¹⁾
1	N 2580-1	Prohibition and declaration of substances	M
¹⁾ Type: M = Document to be supplied; Z = Cited document; H = Historical document			

6 Supporting documents and links

- [1] [SEG Automotive - Prohibition and declaration of substances](#)
- [2] [IMDS \(Material Data System\)](#)
- [3] [SEG Automotive – IMDS Data entry specifications Supplier Specification](#)
- [4] [EU-REACH Regulation](#)
- [5] [ECHA-REACH Candidate List](#)
- [6] [ECHA-SCIP database](#)
- [7] [EU-ELV Directive](#)
- [8] [China-ELV Regulation](#)
- [9] [EU-RoHS Directive](#)
- [10] [ECHA: EU-POP Regulation](#)
- [11] [California Proposition 65 Regulation](#)
- [12] [EU- Ship Recycling and Amending Regulation](#)
- [13] [GADSL](#)
- [14] [EU- Battery Regulation](#)
- [15] [EU- Machinery Regulation](#)

A Appendix: SEG specific requirements on substances

Below the SEG specific substance restrictions are listed, which **apply in addition to the requirements of the GADSL list**.

If the supplier becomes aware of any non-compliance (whether arising from the GADSL or Annex A), he must immediately notify the SEG contact person.

Substance name	CAS No.	Restriction type	Details of the restriction
REACH Authorisation List (Annex XIV) substances	See REACH Annex XIV	P	Substances listed on the EU-REACH Annex XIV shall be phased out from all parts latest one year before the relevant sunset date. This prohibition shall be valid worldwide (the import to the EU is also prohibited). If technically not possible to phase out, the supplier shall inform SEG and apply for REACH authorisation for the specific application for the European market.
Decabromodiphenyl ether, DBDE	1163-19-5	P	The use of bromated flame-retardant decabromodiphenyl ether is prohibited worldwide.
1,3-Di-o-tolylguanidine (DOTG)	97-39-2	P	The use of 1,3-Di-o-tolylguanidine as a vulcanization accelerator is prohibited worldwide.
Decabromdiphenylethan (DBDPE)	84852-53-9	P	Prohibition of use above 0.1% in all products.
Bis(2-methoxyethyl) ether	111-96-6	P	Prohibition of use above 0.1% in all products.

Substance name	CAS No.	Restriction type	Details of the restriction
1,4-Benzenediamine, N,N'-bis(methylphenyl)-	27417-40-9	P	Prohibition of use above 0.1% in all products.
Alkenes, polymd., chlorinated	68410-99-1	P	Prohibition of use above 0.1% in all products.
Tetrabromo-bisphenol A	79-94-7	P	Prohibition of use above 0.1% in RoHS applications from 2024.
Dechlorane Plus	13560-89-9; 135821-74-8; 135821-03-3;	P	Prohibition of use above 0.1% in all products from 2024.
Perfluorohexane-1-sulphonic acid and its salts (PFHxS)	Examples see in GADSL or ACEA Regulatory list	P	Prohibition of use above 0.025 mg/kg (the sum of all PFHxS must not exceed 1 mg/kg) in all products from 2024.
4,4'-Isobutylethylidenedi phenol	6807-17-6	D	Substance is declarable if present over 0.1% in any material.
Critical Raw Materials	See IMDS Critical Raw Material substance list	D	Substances shall be declared if present over 0.1% in any material.
Lead	7439-92-1	P	Prohibition of use above 0.1% in all aluminum materials.
Isopropylphenyl phosphate, PIP (3:1)	68937-41-7	P	Prohibition of use above 0.1% in all products.
Per- and polyfluoroalkyl substances (PFAS)	Examples see in GADSL or ACEA Regulatory list	D	General declarable if used. Be aware of possible low declaration thresholds described in existing or coming legal requirements!