



European
Automobile
Manufacturers
Association

ACEA Position Paper Global Chemical Inventory Compliance



May 2019

EXECUTIVE SUMMARY

A chemical inventory is a record of all chemicals legally manufactured, imported and/or used in the corresponding legal area. One has to differentiate between mandatory (mostly 'older') inventories, REACH-like inventories, 'new' inventories and mixture/substance registers. In general, chemical substances (on their own or in mixtures) that are not listed in chemical inventories will be regarded as new chemical substances under the specific chemical regulation and must be registered / notified to authorities prior to manufacture or import. Such substances may have further downstream obligations, like notification of classification and labelling (eg EU CLP) or per significant new use rules (eg US SNUR). The inventory requirements and the further obligations may also apply to substances in mixtures which are incorporated in articles (eg windshield washer fluid in vehicles).

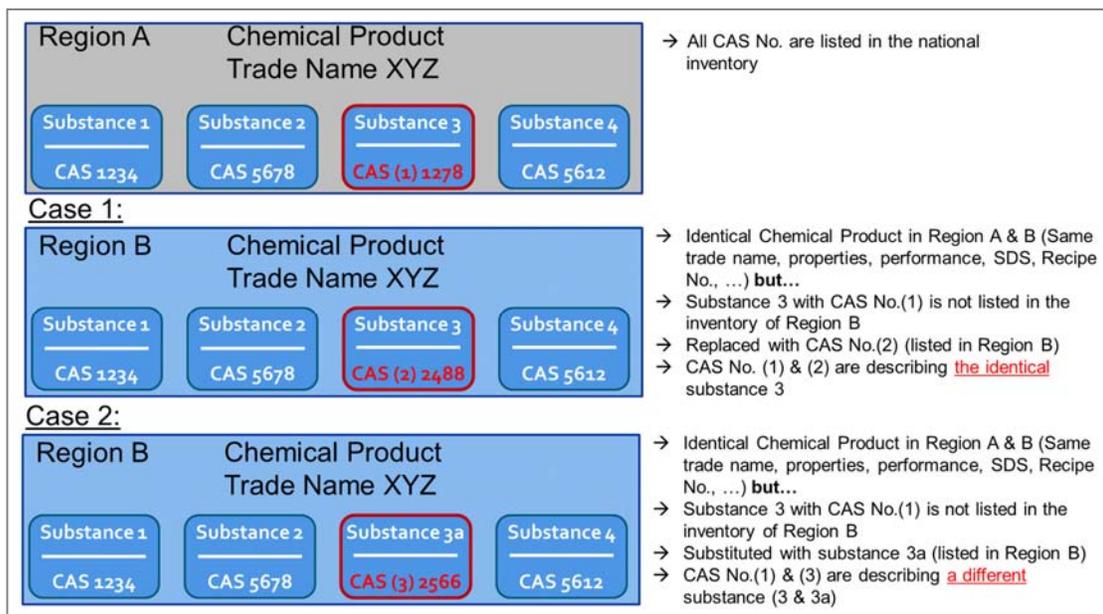
Worldwide, approximately 10 mandatory and several still voluntary chemical inventories must be monitored and fulfilled by manufacturers and importers. Several other obligatory inventories are currently under development, with this number expected to increase in the next few years.

Although chemicals are not the automotive industry's key business, we use chemicals globally for production, operation and maintenance of vehicles. Bearing this in mind, we have noticed an increase in questionable chemical conformity declarations provided by chemical suppliers. It is the experience of the automotive industry that other means of information communication such as written supplier statements or Safety Data Sheets are often incomplete. The only reliable option for the automotive industry to check the chemical conformity is to be able to review the full declaration of the chemical composition.

Reasons for incorrect conformity declarations:

- 1. No common use of standard methods in the chemical supply chain:**
Companies often check raw material compliance by seeking confirmation from their supply chain without performing the required plausibility checks. For example, they often accept general statements such as 'is listed' without inquiring if the substances are 'confidentially listed' or whether other 'import restriction for third parties' exist.
- 2. Lack of knowledge of the full chemical declaration:**
Companies may not know the complete chemical composition of products they provide to their customer or place on the market themselves. This results in false statements and thus increases the risk of import restrictions and production interruption.
- 3. Information sources:**
Companies often use the Safety Data Sheet Section 3 as the only source for the full chemical declaration. This has proven to be incomplete or often incorrect and is not sufficient to fulfil the obligations of the chemical inventories. For example, most polymers or other non-hazardous substances are not subject to Safety Data Sheet Section 3.
- 4. 'Alternative' multiple CAS no. per substance:**

Often different CAS nos. are used to describe the same substance. This often results in the reporting of similar but not identical chemicals without official confirmation by the responsible competent authorities.



THE AUTOMOTIVE INDUSTRY REQUESTS THE CHEMICAL INDUSTRY TO:

1. Define criteria for providing reliable conformity statements.
2. Define criteria for a transparent legally compliant solution that enables use of the same substances globally without changing their customers internal production release processes.
3. Solve the 'Multiple CAS no.' challenge:
 - Develop processes to enable companies to report full chemical composition along the supply chain without violating the rules of confidential business information.
 - If it seems necessary to use multiple CAS nos. for a single substance, the following criteria have to be fulfilled:
 - Each CAS no. must be plausible and legally compliant;
 - Scientific evidence on the correctness of the selected CAS no. must be provided;
 - In case of doubt, a written confirmation by the responsible competent authority must be provided;
 - Modified chemical compositions must always be approved by the automotive customer.

- Every chemical composition ('formulation') must be assigned a unique formulation identification no. which is mentioned on all relevant documents required to prove market access (ie SDS, full chemical declarations and registrations status confirmations);
- Different formulation identification nos. must be assigned for the different chemical compositions;
- Discussion must be started at UN level aiming at globally harmonised chemical inventories, or alternatively at an agreement about mutual acceptance of the national chemical inventories.

Until a broadly accepted solution is available, the automotive industry requests the chemical industry to establish transparent criteria / rules per legal area on how conformity with chemical inventories can be guaranteed.



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ABOUT ACEA

- ACEA represents the 15 Europe-based car, van, truck and bus manufacturers: BMW Group, DAF Trucks, Daimler, CNH Industrial, Ford of Europe, Honda Motor Europe, Hyundai Motor Europe, Iveco, Jaguar Land Rover, PSA Group, Renault Group, Toyota Motor Europe, Volkswagen Group, Volvo Cars, and Volvo Group.
- More information can be found on www.acea.be or [@ACEA_eu](https://twitter.com/ACEA_eu).

ABOUT THE EU AUTOMOBILE INDUSTRY

- 13.3 million people – or 6.1% of the EU employed population – work in the sector.
- The 3.4 million jobs in automotive manufacturing represent over 11% of total EU manufacturing employment.
- Motor vehicles account for some €428 billion in tax contributions in the EU15.
- The sector is also a key driver of knowledge and innovation, representing Europe's largest private contributor to R&D, with €54 billion invested annually.
- The automobile industry generates a trade surplus of €90.3 billion for the EU.