INTERNATIONAL

Restricted Substance Reporting Procedure

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1.0 PREAMBLE

The International Material Data System (IMDS) www.mdsystem.com is a global system used by the automotive industry to manage material and environmental data for automotive components. It enables manufacturers and suppliers to collect, analyze, and report material compositions in compliance with various environmental and governmental regulations.

This instruction outlines the basic requirements all suppliers to International Motors, LLC must complete. It provides guidance on creating, managing, and validating Material Data Sheets (MDS) to ensure compliance with regulatory and customer requirements. Adhering to these guidelines will:

1.1 Ensure accurate material declarations
1.2 Minimize rejections due to incorrect or incomplete submissions
1.3 Facilitate seamless communication of material data throughout the supply chain

All team members responsible for IMDS submissions must be familiar with the IMDS system's requirements, International Motors' requirements, and relevant automotive industry standards. International takes IMDS and material compliance seriously and has contracted a team of IMDS resources to support these efforts.

2.0 PURPOSE

To direct and instruct suppliers on how to create an acceptable MDS.

3.0 SCOPE

This procedure applies to suppliers that submit PPAP to the International Supplier Quality group.

4.0 DEFINITIONS

Production Part Approval Process (PPAP) – documentation package with evidence showing that a purchased part meets International Motors LLC (International) requirements.

Phased PPAP – Indicator of part maturity. Multiple phases of PPAP approach from prototype to multi-stream, run at rate production.

Advanced Product Quality Planning (APQP) – a multi-disciplined approach to product and process development published by AIAG.

Part Submission Warrant (PSW) – shows the reason for submission (design change, material change, etc.) and the level of documents submitted to the customer. It is the official request from the supplier for production and shipping approval.

Restricted Chemical Substances Specification (MPAPS B-50) – is the International corporate specification on restricted substances. Located at www.navistarsupplier.com / Integrated Supplier Quality.

International Material Data System (IMDS), www.mdsystem.com.

Global Automotive Declarable Substance List (GADSL), www.gadsl.org.

Material Data Sheet (MDS) – created in IMDS and includes materials and substance composition of a part or material.

Material Safety Data Sheet (MSDS) contains required regulatory information on how to work safely with the chemicals in a product.

IMDS ID – unique identifier of an MDS, assigned by IMDS.

5.0 RESPONSIBILITY/ACCOUNTABILITY

Supplier – collect, enter, submit material and substance information to International using IMDS.

International Representative – to review, verify against requirements and make an accept / reject decision.

6.0 MEASURE OF SUCCESS

MDS disposition completed within 5 business days.

7.0 ACTIONS

MPAPS B-50:

It is required that the parts we purchase comply with our MPAPS B-50 specification, available at www.navistarsupplier.com. This standard endorses the Global Automotive Declarable Substance List, found at www.gadsl.org.

Once the supplier's part has received PPAP approval, it may be used in any application approved by our Engineering groups. This means the supplier's part could be exported to the European Union or other countries with specific regulations and lists of restricted materials and substances. Many of these regulations and substance lists are subject to frequent changes. Therefore, it is crucial for International to be aware of the substances contained in the parts The supplier supply to us.

Depending on the application of the supplier's part, additional restricted material standards may apply. Please contact the supplier's International Supplier Quality Representative for further information.

International Material Data System (IMDS) (www.mdsystem.com)

International uses the IMDS for suppliers to report and declare the substances used in their parts. The supplier will need to create a Material Data Sheet (MDS) in IMDS and submit it to us for review. We will then review the MDS and either accept or reject it. An accepted MDS indicates that the information and substances in the supplier's part meet our requirements. An MDS can be rejected for several reasons, including incorrect part number, prohibited substances, or incorrect tree structure.

International Motors IMDS account: 186555

APQP and MDS

An MDS should be submitted as early as possible. The creation and submission of an MDS should be included as part of the supplier's APQP process. We review MDSs regularly. By submitting early, there is ample time to make corrections and avoid delays with PPAP approval.

MDS ID on Phased Part Submission Warrant and Evidence for PPAP

The supplier must include the accepted MDS ID and International Motors' acceptance date in the appropriate location on the Phased Part Submission Warrant.

Additionally, evidence of International Motors' IMDS submission acceptance shall be provided with PPAP by attaching a copy of the IMDS report showing where it has been submitted to International Motors' IMDS account 186555 and showing status as accepted.

Change Control and Resubmission of MDS

Resubmission of an MDS is required in the following cases:

- Design change or part number change (including suffix change)
- Supplier change (i.e., resourcing) or Supplier location change (also for sub-supplier changes)
- Process change affecting the material / substance composition
- Part weight changes more than 5% weight
- Update to the GADSL requiring disclosure of a restricted substance previously marked confidential or included in a system substance

Preparation prior to creating an MDS

To create an MDS, the supplier needs the following information:

- MDS accepted by the supplier from their sub-suppliers (should be part of the supplier's sub-supplier PPAP process)
- Certificates of analysis from their sub-suppliers (such as steel mill certificates and plating certification)
- "Full disclosure" Material Safety Data Sheet (MSDS) from the supplier's material (be aware of process chemicals, such as water, toluene)
- International and/or the supplier's part drawing(s)
- Bill of Material

International prefers that the supplier use the materials published by the IMDS committee, such as the Stahl und Eisen Liste, ILI for common materials, and semi-components published by ZVEI for electronics (see Recommendation 019).

Warning: Be cautious when using published materials from unfamiliar sources in IMDS. Some material MDSs available do not meet the official material specifications.

Warning: Be cautious if using "Wildcard" basic substances (e.g., *miscellaneous substances, not to declare*). The use of wildcard basic substances means that none of the chemicals contained therein were declarable according to GADSL at the time the MDS was created. However, as regulations change, GADSL is updated every 6 months. Suppliers who used wildcard basic substances then must review each of their IMDS to determine if they were affected by any GADSL changes. If they were affected, suppliers must modify their MDS and resubmit them to their customers.

Hiding Restricted Substances: IMDS rules do not allow hiding restricted substances in the so-called "system substances" (e.g., Misc. not to declare) or confidential substances.

Submitting to the Appropriate International Group: After creating the MDS for the part and entering the supplier's supplier information, submit the MDS with an appropriate part description in English and the International part number to the IMDS account number listed at the beginning of this procedure.

Reject criteria

We use the following criteria to reject an MDS:

- International part number is not correct
- Part description is not in English (English followed by local language is OK)
- Part description is not described as appears on the print or contract
- Part description includes International (Navistar) name and/or part number
- Competitor name used in the MDS nodes
- IMDS Recommendations are not followed
- Material classification is not correct or missing (includes substance minimum warnings)
- Materials made with one substance (meaning a pure material) without an explanation in advance
- Missing or wrong substance in material (e.g., steel without Iron, SI instead of Si)
- Application field is incorrect or not filled in
- Restricted substances without an exemption or are above the weight proportion as specified by GADSL.org
- Material exceeding 10% of system substances and confidential substances
- Weight tolerance greater than 5%
- Proper use of semi-component nodes
- Polymeric marking question not answered
- Missing International Supplier Code including manufacturing location suffix (e.g., 12345X1)
- Missing drawing information in recipient data
- MDS not marked forwarding allowed
- Missing BOM components and materials – (correct quantity, components, materials, labels, inks, etc.)
- Material and weight mismatch versus design record estimates
- Incorrect polymer symbols used
- Material naming not according to IMDS Recommendations
- Recyclate information not yet answered
- Missing material norms/standards
- MDS marked as preliminary
- Polymeric parts marked "No"
- MDS contains hidden or deleted substances
- Substances ranges are not per IMDS Recommendations
- MDS may contain International prohibited substances
- MDS not meeting regulatory requirements
- Material composition is not given in its end-product state

We regularly review received MDSs and include a rejection reason in the denial notice field. We may or may not contact the supplier upon rejection. It is the supplier's responsibility to check the status of the submitted MDS in IMDS. IMDS offers an email notification option that will send an email when the status of an MDS changes.

What to do when the supplier's MDS is rejected?

Review the reject / denial notice. Make corrections, as appropriate, and resubmit. When the rejection notice refers to prohibited substances, please verify the information that the supplier used to create the MDS.

If the reason for the rejection cannot be resolved (for example there is a drawing requirement to use a restricted substance), please contact the supplier's International Supplier Quality Representative.

I am stuck and do not know what to do?

Contact the supplier's International Supplier Quality Representative, who will guide the supplier to someone who can assist.

Or contact IMDS@international.com

8.0 FORMS

None

9.0 RECORDS

MDS in IMDS

10.0 REFERENCES

International Requirements to do Business

MPAPS B-50 – Restricted Chemical Substances IMDS User Manual (latest edition)

IMDS Recommendations (available after login to IMDS)

CVS10 – Commercial Vehicle Standard 10

11.0 REVISION HISTORY

Revision	Change	Date
A	New ISQ Procedure; Update / minor changes from NTSQ-003 IMDS guidelines. Changed format to ISQ procedure style, rearranged paragraphs	03/24/2014
B	Remove Navistar IMDS Accounts 93204, 93205, 91220, and 88823 Add Vista account ID 186555	09/28/2018
C	Updated to new International Motors format; Changed all Navistar references to International and current procedures.	12/10/2024