

Answer to IMDS requests for tyres out of the scope of ELV Directive

The IMDS data system was originally created in 2000 by German Automotive manufacturers to comply with the European Directive 2000/53/EC concerning end –of-life vehicles. Article 2.1 of the above mentioned Directive defines vehicles subject to its prescriptions as those designed as category M₁ or N₁ (according to the definition provided in Annex IIA to Directive 70/156/CEE) and as three-wheeled motor vehicles (according to the definition provided in Directive 92/61/ECC) but excluding motor tricycles. Therefore motorcycles, trucks, agricultural vehicles, earthmover vehicles, aircraft are examples of vehicles which are out of the scope of the ELV directive.

At that time, the European Tire and Rubber Manufacturer Association (ETRMA, former BLIC) developed a standard template to be adopted by tyre manufacturers in order to describe the basic tyre chemical composition, according to ELV Directive. The model, which was approved by the IMDS Automotive Manufactures steering committee, allowed protection of business confidentiality of supplied parts and covering the description of a wider possible range of tyres.

Over time, the scope of the IMDS has been extended to communicate information related to specific substances (Global Automotive Substance Declarable List, GADSL) and comply with worldwide chemicals reporting obligations such as REACH SVHC, RRR, the Canadian Environmental Protection Act etc...

Today the IMDS system requires by default the submission of information on **the basic composition** for products out of the scope of the ELV Directive. Since the composition data under ELV is not required for products out of the scope of this directive and therefore not developed by the sector, the IMDS system cannot be used for the time being for communicating information related to such tyres.

In order to use IMDS for tyres out of the scope of the ELV Directive, changes would be required in the IMDS system. ETRMA is at your disposal to discuss options for adjustment of the IMDS system.

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