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To whom it may concern,

The IMDS data system was created in 2000 by German automotive manufacturers to comply with European Directive 2000/53/EC concerning end-of-life vehicles.

Article 2.1 of European Directive 2000/53/EC defines for the purposes of this Directive that vehicles are:

Any vehicles designated as category M₁ or N₁, defined in Annex IIA to Directive 70/156/CEE, and three-wheeled motor vehicles as defined in Directive 92/61/EEC, but excluding motor tricycles.

Directive 70/156/CEE further defines vehicle categories M₁ and N₁ to be:

- Category M₁: Vehicles used for the carriage of passengers and comprising no more than eight seats in addition to the driver's seat;
- Category N₁: Vehicles used for the carriage of goods and having a maximum weight not exceeding 3.75 metric tons;

Michelin and the tyre sector in Europe concluded that these definitions exclude heavy commercial vehicles, and therefore heavy truck and bus tyres, from the scope of European Directive 2000/53/EC.

As a consequence the European Tyre and Rubber Manufacturer Association (ETRMA) provided a template to meet IMDS specifications, which was approved by the IMDS Automotive Manufacturers steering committee and which only applies to passenger and light truck tires.

While heavy truck and bus tyres lie outside IMDS reporting, Michelin nevertheless takes its legal and environmental responsibilities seriously and has taken the actions necessary to comply fully with the European Community Regulation on chemicals and their safe use (Regulation EC 1907/2006), which regulates all substances of high concern. Further, in respect of our Company values, the Michelin Performance and Responsibility Charter contain nine themes for specific action, including: Responsible performance of our products and services; Environmental impact of tyre use; Recycling of end-of-life tyres. This Charter and the latest Report on its execution may be consulted at the following address.

<http://www.michelin.com/corporate/front/templates/affich.jsp?codeRubrique=77&lang=EN>

I remain at your disposal should you require any additional information on this subject.

Yours faithfully,

Patricia Le Gall
Quality Director, Truck and Bus Europe

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