



DXC CDX WEBINAR | April 15, 2025

Leveraging IMDS product declarations for Heavy Equipment and other industries using DXC CDX

Chuck LePard,
IMDS/CDX Americas Representative

DXC at a glance

\$13.7B

FY24 revenue

60+

years of innovation delivering mission-critical systems for customers

125,000+

employees worldwide

70+

countries

200+

partner ecosystem with best-of-breed partners

200

customers in the Fortune 500

AA

rating from MSCI for outstanding ESG performance ([disclaimer](#))

#294

in the 2024 Fortune 500

CDX at a glance

Build on the IMDS Foundation

DXC (then EDS) created IMDS in 2000 - the 1st supply chain chemical data system

CDX In Operation since 2011

DXC leveraged the lessons learned while providing IMDS to create CDX

30,000+

Chemical Abstract System (CAS) substances found in common products

10,000+

Of standard metals with compositions and norms

Compliance & Privacy Certifications

- ISO 9001 Quality Management
- ISO/IEC 27001 Information Security Management
- ISO 50001 Energy Management
- SOC1 & SOC2
- TiSAX

Memberships

CDX is an active member and partner of several international associations, where we work closely with various industry players to ensure the best use of our products.



12k+

Companies
registered

40k+

Active users

~1MM

Material
Declarations
(MDSs)

50.5k+

Conflict Minerals
Declarations
(CMDs)



Enhance compliance by
streamlining data and reducing
manual effort



Speaker Introduction

Chuck LePard

IMDS & CDX Americas Representative

Chuck.Lepard@dxc.com

LinkedIn Profile

- **Degrees in Electrical & Computer Engineering and Computer Science**
- **Honorable Discharge, United States Navy**
- **40 Years EDS/General Motors/Hewlett Packard/HPE / EntServ / DXC**
- **Decades of plant floor and engineering experience in related areas**
- **Advisor to multiple manufacturing industry groups**
 - Automotive Industry Action Group, International Aerospace Environmental Group,
 - Association of Equipment Manufacturers, Responsible Materials Initiative
- **Leader in Standards Development organizations**
 - American National Standards Institute (ANSI), International Standards Organization (ISO) Technical Committee TC-111 on Environmental Sustainability Data Exchange
 - IPC 2-18 175x family for Product Declaration and Compliance reporting



Ramifications of IMDS Data Use Beyond IMDS

Use IMDS product declarations beyond IMDS with CDX

Discover how DXC CDX enables heavy equipment manufacturers and other industries to maximize the value of IMDS product declarations beyond the automotive sector. Learn to export, enhance, and convert IMDS data to meet industry-specific compliance needs, including HEDSL & other regulatory requirements.

Key Takeaways:

- Exporting IMDS data for use with IMDS-using companies for non-IMDS products
- Export IMDS data for use beyond IMDS OEM Automotive/On-Road vehicle industry clients
- Permitted and prohibited uses of the three types of IMDS data beyond IMDS
- Using CDX to leverage IMDS data for Heavy Equipment and other clients beyond on-road vehicles
- Using CDX to enhance IMDS data and include HEDSL and other regulations and client requirements
- Using CDX to convert imported IMDS and enhanced CDX declarations to industry-standard formats
- Live demonstration of CDX capabilities (with required IMDS and CDX licensing) of:
 - Importing IMDS declarations into CDX
 - Enhancing CDX declarations for broader regulations and client requirements
 - Exporting the enhanced declaration as an industry-standard IPC-1752 or IPC-1754

Data use beyond IMDS scenarios

Three typical scenarios in which IMDS data is used beyond IMDS:

1. Export IMDS data for use within IMDS-using companies.

This type of usage has occurred since the beginning of IMDS.
Subject to IMDS Terms of Use. No or few issues, not addressed.

2. Export IMDS data for use beyond Automotive.

First authorized in February 2016, in presentation scope.
Recipients are not subject to IMDS Terms of Use, caution needed
This is the primary focus of the demonstration

3. Export IMDS data for non-IMDS Automotive (CAMDS)

Authorized only under specific conditions and is explored in this presentation.
The receiving system (CAMDS) and users are not subject to IMDS Terms of Use; caution needed.



ToU conditions for IMDS data Further use*

Data-Receiving User shall not (sub-) license or transfer data provided in IMDS, except as specified.

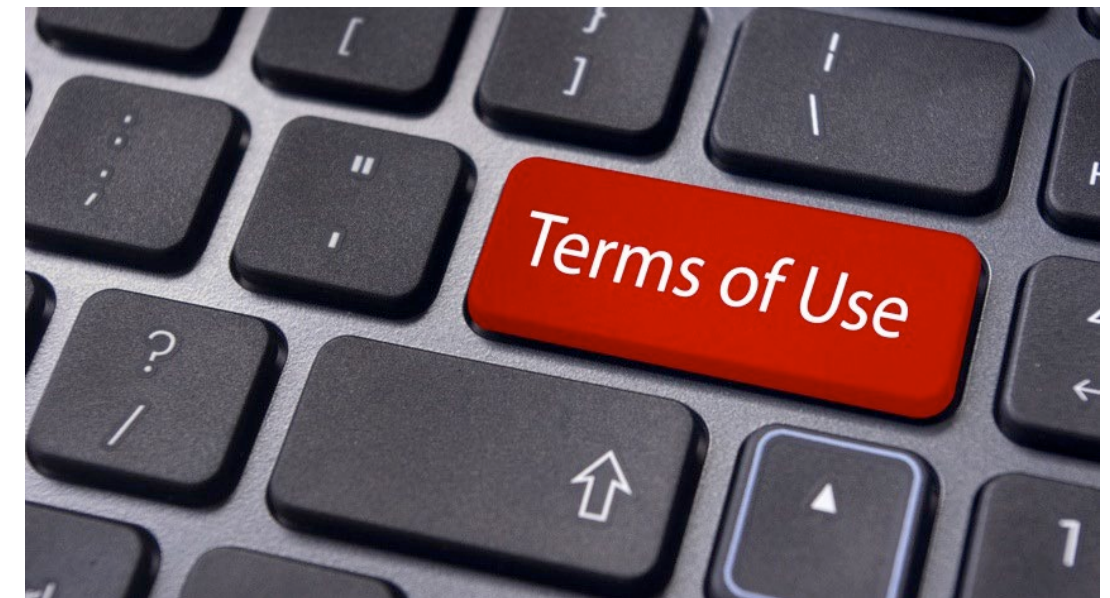
Data-Receiving User shall not disclose/give access to IMDS data to third parties, except Further Clients.

Any further use must be approved by Data-Providing & Data-Receiving User representatives in advance.

Suppliers agree their IMDS data can be transferred by IMDS Users to external non-IMDS recipients when necessary to comply with regulatory requirements, If the party performing the transfer:

- Possesses a valid IMDS OEM or IMDS-Connect license
- Sends to Further Clients which are direct recipients of the goods
- Sends into a Third-Party-System applicable in country of supply
- Meets the non-standard data use conditions specified at:
<https://public.mdsystem.com/en/web/imds-public-pages/non-standard-data-use>

*** IMDS Terms of Use are paraphrased here to facilitate presentation.
Refer to IMDS Terms of Use for official terminology.**



IMDS Non-Standard data usage conditions*

as set by the IMDS Steering Committee Data Use Work Group

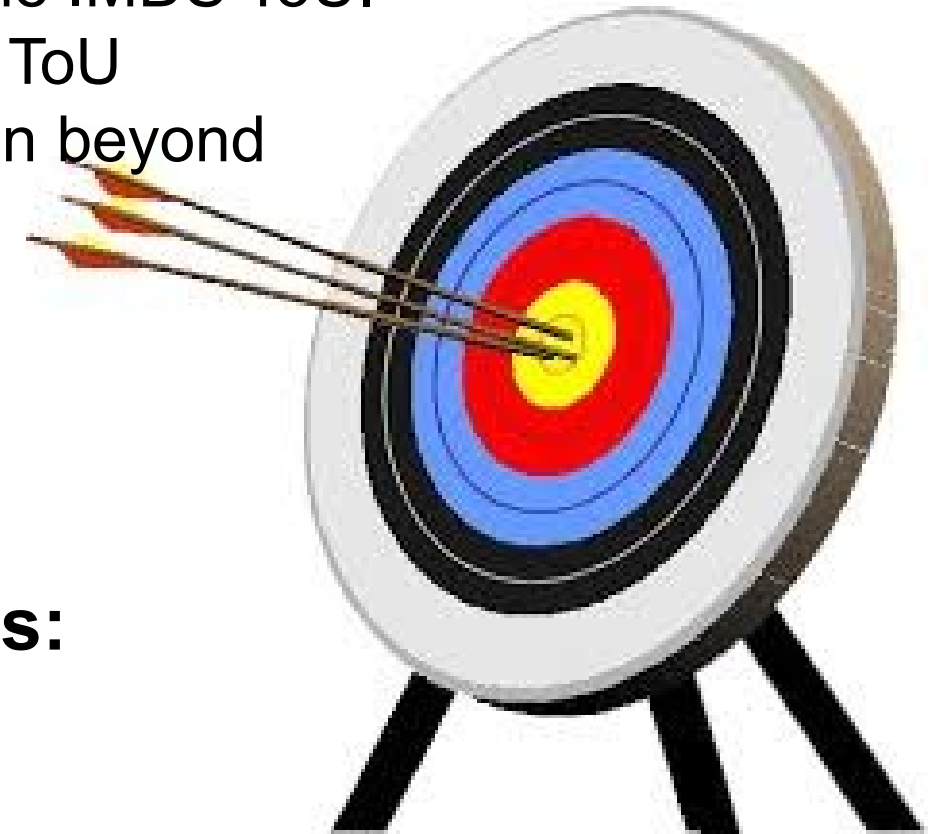
<https://public.mdsystem.com/en/web/imds-public-pages/non-standard-data-use>

A company extracting IMDS data takes responsibility to ensure target systems and users:

- Meet all requirements regarding the data usage as defined in the IMDS ToU.
- Provide no data access for third parties as defined in the IMDS ToU
- Allow access only to recipients defined by sender, no publication beyond
- Permit no systematic analysis of data by any third party
- Include no disclosure of supply chain beyond one level
- Authorize usage only for compliance issues
- Perform unauthorized transfer to other systems (no forwarding)
- Support bi-directional data transfer with IMDS

IMDS download companies must ensure target systems:

- General IT infrastructure fulfills common IT security standards
- Conform to the international standard ISO/IEC 27001:2013



* IMDS Non-standard data use stipulations are paraphrased here to facilitate presentation. Refer to IMDS website for official terminology.

Non-Standard IMDS data usage: Owned product MDSs

Data Ownership: The Data-Providing User retains ownership of all data they originate.

If it is your product, and you created or loaded the entire data sheet, it is your Owned data.
You can extract and send Owned data wherever you wish, with whomever you wish.

However...

If your MDS uses IMDS Committee standard materials, restrictions apply

If your MDS uses supplier MDSs, restrictions apply

IMDS has provided value to structure and organize your MDS.

An IMDS-Connect license is needed to export. No PDF Reports or parsing tools



IMDS ID / Version: 677280322 / 1
User: LePard, Chuck

Page: 1 / 309
Date: 2/23/18 9:23:59 PM

MDS Report

Substances of assemblies and materials

This report is for internal Automotive industry use only. Distribution to non-Automotive clients is a violation of the Terms of Use, and is not permitted unless a written permission was given by DXC Technology. Parsing is not allowed.

Non-Standard IMDS data usage: Published MDSs

Data-Receiving User shall NOT disclose / give access to IMDS data to third parties, except Further Clients

Published IMDS Committee standard materials, ZVEI standard electronics, and non-preferred published data sheets in IMDS are the protected intellectual property of the respective organizations, and must be removed from product MDSs before loading into CAMDS. CAMDS offers “Recommended company” MDSs which may be suitable substitutes.



“IMDS Committee” material suppliers

Stahl und Eisen Liste (ID: 313)
IMDS-Committee (ID: 423)
IMDS-Committee / ILI Metals (ID: 18986)
ZVEI-Rec019 (ID: 102677) (semicomponents)

CAMDS “Recommended companies”

CAMDS management committee (ID: CA_3_80)
CAMDS Material Working Committee (ID: CA_3_9707)

Non-Standard IMDS data usage: Published MDSs (non-standard)

Data-Receiving User shall NOT disclose / give access to IMDS data to third parties, except Further Clients

- **IMDS using companies are licensed to use published MDSs in accordance with the Terms of Use**
- **Companies which extract published data sheets from IMDS are responsible to ensure Further Use conditions are met by any system or company to which they are disclosed**

If your company cannot ensure the conditions will be met, then your company is responsible to remove or replace the MDSs

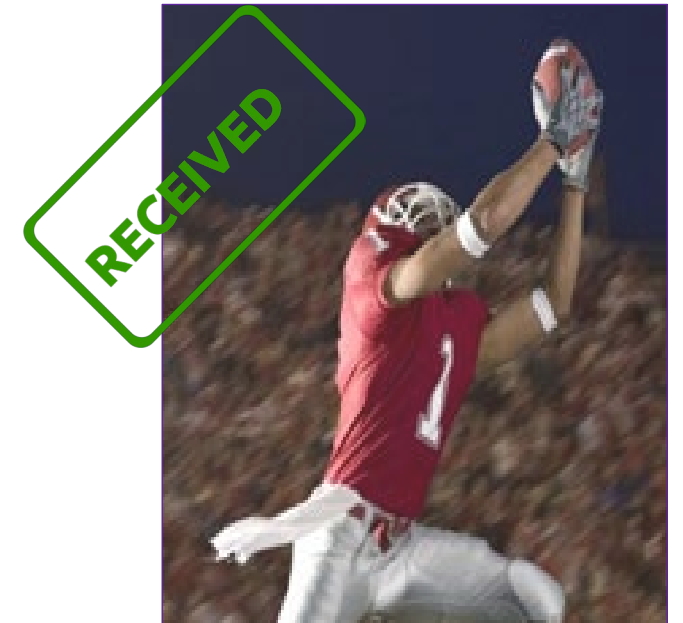
- **Companies extracting MDSs must obtain Authorization to disclose non-preferred published data sheets from the publisher (outside IMDS). If authorization is not obtained, then the published data sheet must not be used.**



Non-Standard IMDS data usage: Received / Accepted MDSs

Supplier IMDS data can be transferred to external non-IMDS recipients to comply with regulatory requirements, if the party performing the transfer:

- Possesses a valid IMDS OEM or IMDS Advanced Interface (IMDS-Connect) license
- Sends to Further Clients that are direct recipients of the physical goods
- Sends into a Third-Party-System applicable in the country of supply
- Meets the IMDS Terms of Use conditions for Further use,
- Meets the Non-standard data use conditions specified at:
<https://public.mdsystem.com/web/imds-public-pages/non-standard-data-use>
- Companies which include supplier data sheets from IMDS are responsible to ensure the conditions are met by any system or company to which they disclose the supplier data sheets



Your company must verify these conditions are met before disclosing supplier data. If not:

- Use must be approved by Data-Providing & Data-Receiving User representatives in advance
If not authorized, your company is responsible to remove or replace the MDSs.

IMDS – CAMDS data exchange capability

The IMDS Sponsors Group / Steering Committee (SG/SC) and CATARC implemented bi-directional data exchange for companies using the IMDS-Connect and the CAMDS Advanced Interface (CAI) data transfer service

IMDS-Connect and CAI product declarations have been exchanged



- Technical teams have mapped fields between IMDS-Connect and CAI
- There is no expectation of a direct system-to-system interface
 - Sharing occurs when an IMDS-Connect using company sends IMDS-Connect information to CAI, and vice-versa
- Data sharing will be as necessary, and where license and IP rights allow
- There is a requirement for data from CAMDS to be sharable to IMDS, although I am unaware if this is actually used at this time

Drivers for data sharing with CAMDS

Required as a material regulatory compliance reporting obligation

Analogous to ELV reporting obligation

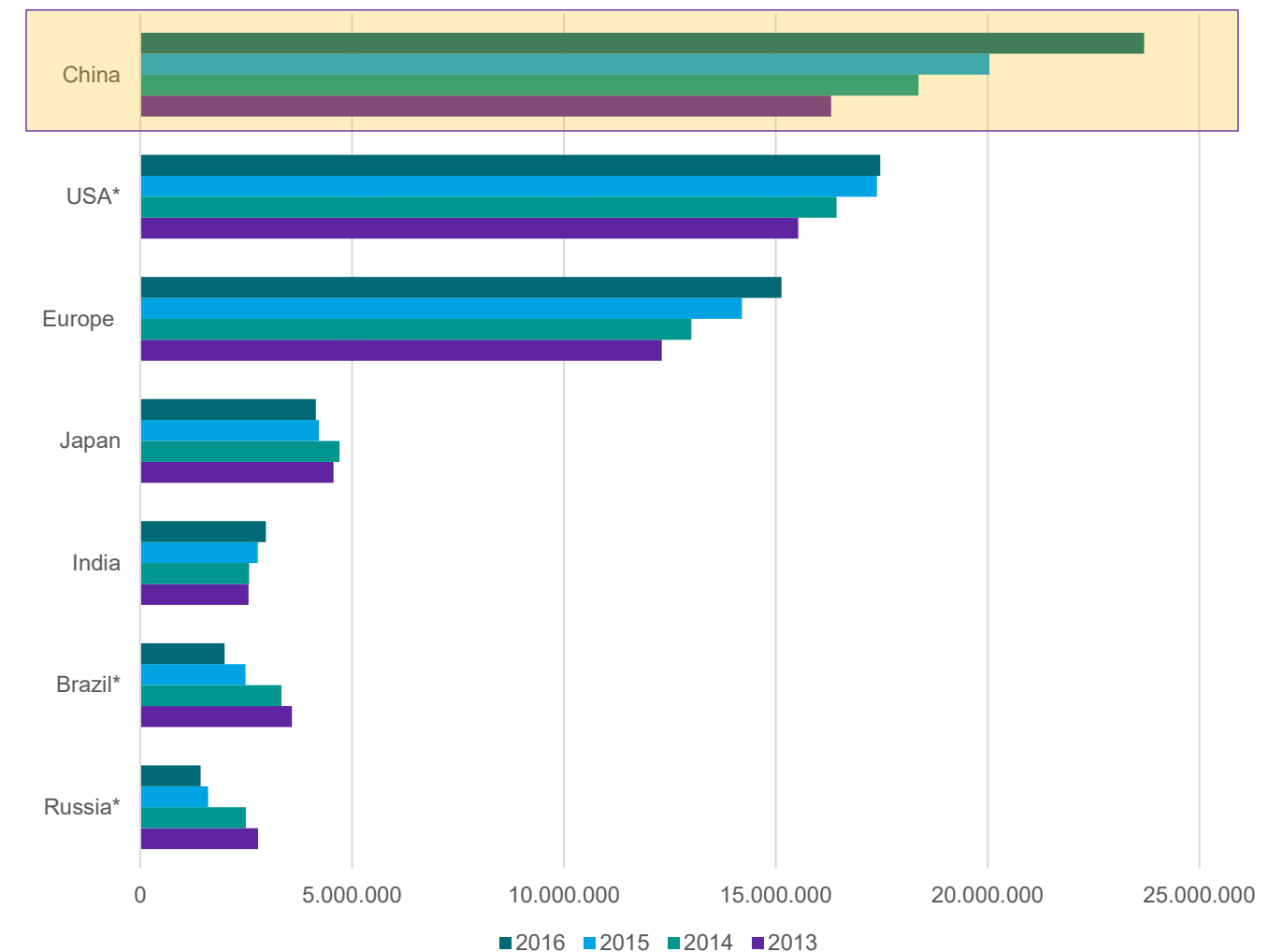
Necessary for participation in Chinese market

Analogous to PPAP requirements from IMDS OEMS

Largest automotive market, with highest rate of growth

Avoidance of duplicate data entry in IMDS and CAMDS

Worldwide Car Sales by Year



China Automotive Technology and Research Center (CATARC) Role and Mission



Main Businesses

- Testing
- Engineering Technology Research
- Engineering Designing and Contracting
- Certification Service
- Big Data
- Consultation Service
- C-NCAP
- C-ECAP
- Vehicle Forensic Investigation



China Automotive Technology and Research Center Co., Ltd.

About CATARC

Main Business

Science and Technology Innovation

Human Resources

The best think tank for the Chinese automotive industry



Profile: A central government-level enterprise of the {People's Republic of China (PRC)} State-owned Assets Supervision and Administration Commission of the State Council

CATARC Mission Statement

http://www.catarc.ac.cn/ac_en/content/20160428/21056.html

...we work on the key and common technology in the auto industry, strive to enhance the auto industry technological competitiveness and *promote the technical progress for the Chinese auto industry.*

April 26, 2017

Intellectual Property (IP)

IMDS Versions 1 – 7.2 © 2000-2013

CAMDS © 2010-2018

- During a 2010 JAMA-requested comparison between the ten year compilation of IMDS Committee standard materials (IP) and the 1 year CAMDS Recommended materials , the standard materials were found to have a 95%+ correlation
 - Included in the matching items were 20 items for which the material names were incorrect in IMDS (German material names copied to English), and the exact same German material names were found in the CAMDS English material names
- CATARC reports they have implemented new IP protections for CAMDS users.
However, remember CAMDS is not IMDS, and be aware of what you share.

Non-standard data use - data security considerations

Talk with your suppliers! Help them understand data is more exposed than in the past

- This greatly reduces your company's risks

Obtain supplier permission (outside IMDS) to use data

- At least a few OEMs are using this approach
- Explore the risks and benefits of this approach

Discuss alternative MDSs that better protect IP

- Confidential substance and joker / wildcard usage must still comply with the $\leq 10\%$ restrictions.
- Many OEMs impose requirements beyond GADSL. Negotiate alternate rules for MDSs for further use.



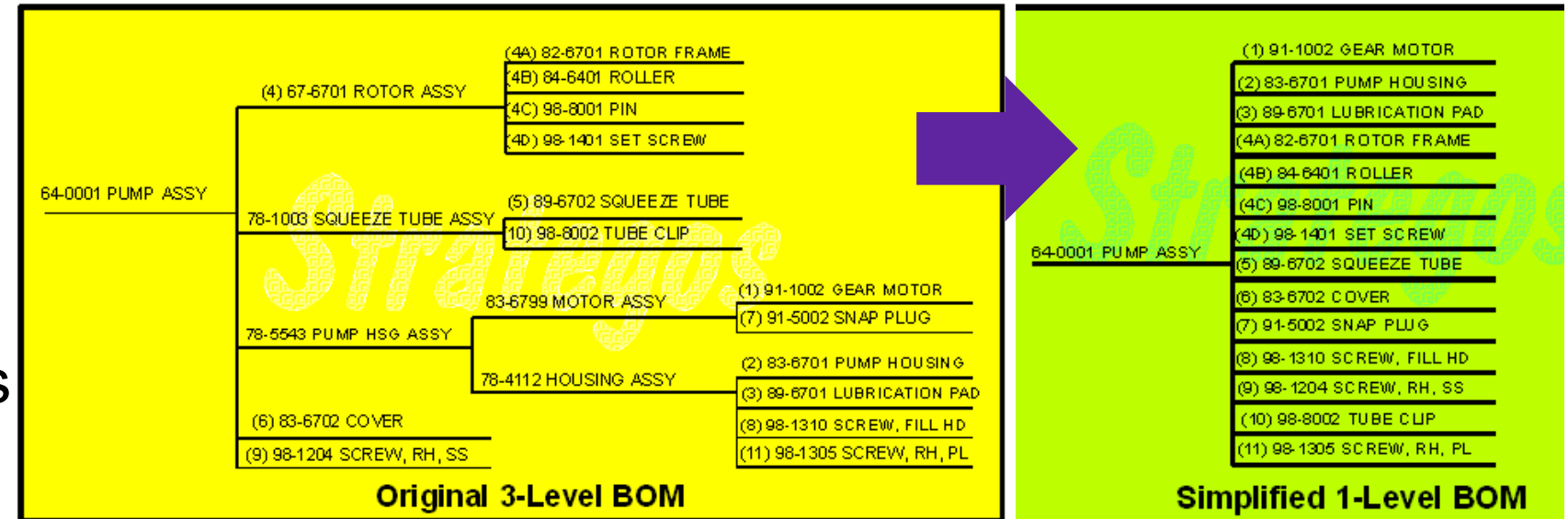
Protect your business, your products, and your supply chain

- IMDS continues to protect your business, yet the rules are changing.
- The markets are strong and growing, yet realize the risks that come with the opportunities
- Be aware of potential impacts of sharing upon your business and your supply chain

Existing mitigation strategies

The OEM flat-BOM approach

- Works well for major assemblies
- Not so well for smaller assemblies



Intermediate solutions

- In-house solution providers offer data transfer solutions for OEMs & IMDS-Connect clients
- **Caution:** In-house solution providers are **NOT** subject to IMDS Terms of Use!
- Evaluate and ensure any purchased services fulfill your obligation as User extracting IMDS data



Enter IMDS-Connect User ID Credentials into CDX Import

CDX - Compliance Data Exchange

Use your IMDS user id and password to log on to the IMDS company containing the MDSs you want to import into CDX. Please note that this company requires an IMDS-AI license in order to use the IMDS MDS Import functionality.

Import IMDS MDS - IMDS Login

User ID

Password

Use last pwd if exists

☐

CDX-SupplierCompanyID

CDX-SupplierPerID

✓ Login

↺ Cancel

