Chemistry for Mobility Europe

STATEMENT
September 2026

IMDS Recommendation 026

Chemical Industry concerns

The recent update to the International Material Data System (IMDS), known as Recommendation 026, introduces a fundamental change in how regulatory information is treated. Chemistry for Mobility Europe, a sector group of Cefic, the European Chemical Industry Council, is the forum of producers of chemical substances that are essential to the automotive value chain in Europe. Its member companies closely follow and support IMDS, and would like to signal the limitations that such change brings in terms of *administrative burden*, *usability*, and *data quality*.

1) Disproportionate Administrative Burden

Recommendation 026 imposes mandatory regulatory questions without sufficient structured industry involvement and transparent to all stakeholders in defining their scope or feasibility, offering no alternative compliance pathways, exceptions, or interim solutions. The inability to include supporting documentation or explanatory comments further reinforces a rigid, system-driven approach rather than a proportionate, risk-based one. Ensuring balanced and inclusive stakeholder engagement is critical to avoid disproportionate burden and to achieve efficient and workable solutions.

- We strongly encourage greater transparency on the underlying decision-making process, including a clear explanation of how different stakeholder groups across the supply chain are consulted and how their input is reflected.
- Chemistry for Mobility Europe would welcome the opportunity to actively contribute to such discussions and support the development of practical solutions.

2) Usability Limitations

The current system design, heavily reliant on pop-up interfaces, is difficult to manage at scale, slows down operations, and increases the likelihood of errors and inconsistencies. These inefficiencies are intensified by the absence of any clear cost allocation mechanism, effectively shifting additional workload and financial burden onto suppliers, while the system provides no mechanism to account for or distribute these costs equitably across the value chain. Moreover, the introduction of a blocking

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mechanism creates substantial operational risk: any missing or delayed regulatory information immediately halts IMDS transactions, with no intermediate state to ensure continuity, meaning that even minor issues can lead to disproportionate disruptions.

- Regulatory information should not block the possibility to send existing datasheets.

At the same time, requiring regulatory information at material or product level even where identical data (e.g. regulatory information on ingredients) applies across material portfolios, creates extensive repetitive manual work, placing a significant administrative burden on companies and diverting expert resources to low-value "click work."

- Introduce a dedicated "Apply to All" functionality within the Chemistry Manager and other areas within IMDS.

Many substance-related declarations and compliance statements often apply to several materials simultaneously. Currently, users may need to update each material record individually, creating unnecessary administrative effort and increasing the risk of inconsistencies.

Therefore, we recommend the introduction of an "Apply to All" functionality in the Chemistry Manager for data elements that are identical across multiple materials or data sets. This functionality would allow users to apply the same value, statement or declaration to multiple selected data sheets at once. This concept could be used not only for substance-related information but also for other areas within IMDS.

A practical example would be Recycled Content (REC025). If the recycled content for multiple materials is known to be 0%, users should have the option to automatically transfer this value to all relevant material records instead of updating each record separately. Overall, we believe that a generic "Apply to All" capability would provide significant value across various IMDS use cases and support more efficient management of material data.

3) Data Quality and Supply Chain Implications

By making regulatory information simultaneously mandatory, blocking, and time-critical, the system creates conditions that may encourage rushed or inaccurate data entry in order to maintain supply chain continuity. This undermines the objective of ensuring reliable regulatory information and increases the risk of inaccurate declarations, inconsistent implementation, and heightened liability exposure. Ultimately, the approach prioritizes system enforcement over data quality, raising serious concerns about unintended supply disruptions and the overall effectiveness of the framework.

To conclude, the introduction of Recommendation 026 brings significant change, but it also imposes disproportionate burdens and risks on upstream participants in the IMDS ecosystem. The codified requirements amplify effort without meaningful participation in their design, create inefficiencies and

scale challenges, expose suppliers to new costs, foster operational interruptions and threaten the integrity of the data the system is intended to safeguard.

To address these challenges Chemistry for Mobility Europe recommends the following suggestions for improvement:

a) **Ensure transparent and inclusive decision-making:**
   - provide a clear explanation of the process followed to define the new requirements, including how stakeholder groups across the supply chain are consulted and how input is reflected;

b) **Enable upstream industry contribution**:
   - Chemistry for Mobility Europe would welcome the opportunity to actively contribute to further discussions and support the development of practical solutions;

c) **Avoid blocking existing datasheets**:
   - regulatory information requirements should not prevent companies from sending existing material data sheets, particularly where the relevant information is already available or where updates are administrative in nature.

d) **Reduce repetitive manual work**:
   - introduce a dedicated "Apply to all" functionality so that identical regulatory information can be applied across relevant material portfolios without requiring repeated manual entry.

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About Cefic

Cefic, the European Chemical Industry Council, is the forum of large, medium and small chemical companies across Europe, accounting for 1.2 million jobs and 13% of world chemicals production.
On behalf of its members, Cefic's experts share industry insights and trends, and offer views and input to the EU agenda. Cefic also provides members with services, like guidance and trainings on regulatory and technical matters, while also contributing to the advancement of scientific knowledge.