

A woman with blonde hair, wearing a grey jacket and a bright yellow high-visibility safety vest, stands in an industrial setting. She is smiling and looking towards the camera. The background is slightly blurred, showing industrial equipment and structures. A large white diagonal line cuts across the image from the top left to the bottom right.

Guide

Beyond the Database

Your Guide to Expanding
Automotive Supply
Chain Requirements



Introduction

Today's vehicles are engineered to meet tough regulatory standards, and the bar is rising as compliance extends beyond production to end-of-life requirements like reuse, recycling, and material recovery. To bring vehicles to market on time, manufacturers need complete, defensible substance and material data for every component, and they need to go beyond database-only reporting. When supply chain data is incomplete, compliance gaps can trigger regulatory roadblocks that lead to lost profits, reputational damage, or restricted market access. This guide outlines the key supply chain data sets automotive manufacturers need, why they matter, and how to build a more resilient supply chain sustainability management program with Assent.

The Automotive Regulatory Landscape

Automotive manufacturers must have visibility into numerous data types to ensure compliance with national and international requirements. There are industry-specific reporting tools used by major original equipment manufacturers (OEMs) to facilitate reporting on industry-specific requirements and obligations. The International Materials Data System (IMDS) is a tool for finished vehicle data submissions that numerous manufacturers are required to use under the End-of-Life Vehicle (ELV) Directive.

However, the regulatory landscape's wide scope makes it difficult for this single tool to adequately satisfy all data requirements. A shallow focus on materials data doesn't address other common obligations, including responsible minerals source of origin requirements and other customer-specific demands. Without a deep platform solution, suppliers risk running into regulatory roadblocks.



Deeper Data Collection Needs

Tools like the IMDS provide a shallow view of the complete automotive regulatory landscape. Many automotive suppliers also provide parts for other industries, such as aerospace or electronics manufacturing, and as a result, there are other regulatory, industry, and customer-specific requirements that automotive manufacturers must meet. The variety of data sets needed to ensure complete product compliance in international markets warrants a deeper solution in order to collect, validate, and report on data outside of automotive industry requirements.

For example, IMDS flags substances of very high concern (SVHCs) for the Registration, Evaluation, Authorization, and Restriction of Hazardous Chemical (REACH) Regulation, but historically the IMDS has been of limited use for tracking them throughout the supply chain. This presents a problem for compliance with the REACH Regulation in addition to the wider EU Waste Framework Directive (WFD), which requires REACH SVHC data.

Collecting and maintaining a usable centralized database of high-quality product data, including which parts and components contain SVHCs, ensures manufacturers can quickly respond to changing regulations and protect business continuity. Platform solutions combined with expert services are often necessary to manage the complex data requirements imposed by the regulatory landscape.

Key Regulatory Data Sets

Working with a complex supply chain opens businesses up to numerous regulatory challenges and requires a large amount of due diligence data. Some key regulatory data sets include:

The EU Batteries Regulation

The EU Batteries Regulation (EUBR) requires automotive manufacturers to ensure batteries are sustainably sourced, traceable, and compliant across their full life cycle, from raw materials to end-of-life recycling. It introduces mandatory carbon footprint reporting, supply chain due diligence, and Digital Product Passports (DPPs), increasing requirements on manufacturers to deliver reliable data. EUBR's DPPs, which apply to electric vehicles, are expected to be the first DPP requirements to go live, with additional product categories following over time. Automotive manufacturers will be increasingly required to collect and share structured, auditable material and sustainability data that meets DPP standards.

CSRD & CS3D

The EU Corporate Sustainability Due Diligence Directive (CS3D) and the Corporate Sustainability Reporting Directive (CSRD) are progressing toward enforcement and will add reporting requirements for automotive manufacturers. Companies are expected to begin formal reporting preparation or compliance steps, the specifics of which depend on their size and location. Automotive suppliers can expect OEMs to push reporting burdens down the supply chain by requiring validated human rights and supply chain sustainability data.

PFAS Restrictions

PFAS, also known as “forever chemicals,” have been subject to tightening global regulations over the last few years. There are existing national-level PFAS bans and restrictions in place in both the U.S. and the EU. Automotive manufacturers will be on the hook to identify



The RoHS Directive & ELV Directive

The RoHS Directive and ELV Directive are considered parallel regulations, with parts scoped under one being out of scope of the other. These regulations have separate exemptions for lead and cadmium, which can lead to confusion where limitations on specific uses of a substance are allowed at a higher level under one regulation than the other.

For example, an electronic component with a specific RoHS exemption for articles above the 0.1 percent weight over weight threshold does not have an equivalent exemption under the ELV Directive. Therefore, an electronic supplier may supply a RoHS-compliant component that is not ELV-compliant. Understanding what components require a RoHS declaration warrants a deeper level of due diligence.

and remove PFAS in their automotive supply chains, requiring extensive amounts of data and effort to meet compliance requirements.

The ELV Directive

The End-of-Life Vehicles (ELV) Directive aims to reduce waste produced by vehicles at the end of their useful life and places responsibility on producers to recycle as much of a vehicle's material as possible. The IMDS was designed to handle ELV data, and provides functionality for reporting on the Regulation on Recyclability and Recycling (RRR) Directive, while other regulations are addressed by the IMDS in a limited capacity, if at all.

The REACH Regulation

The REACH Regulation restricts the use of listed SVHCs in products made and sold within the EU; obligations vary depending on a business's role in the automotive industry. Depending on their role, manufacturers should maintain an inventory of any substances, mixtures, or articles they use to help determine their compliance obligations.

The EU RoHS Directive

The EU Restriction of Hazardous Substances (RoHS) Directive controls the use of dangerous materials in electrical and electronic equipment (EEE). Vehicles contain a variety of EEE, including electrical wipers, navigation systems, and electric window systems. Though the RoHS Directive excludes EEE for vehicles as defined by Directive 2011/65/EU, Article 2(f), certain components may fall within its scope. This regulation is critical for automotive suppliers that service other industries that are not excluded.



The Global Automotive Declarative Substance List

Developed and managed by the Global Automotive Stakeholders Group, the Global Automotive Declarative Substance List (GA-DSL) is comprised of substances that are restricted or controlled by various regulatory requirements and restrictions, such as the REACH Regulation, ELV Directive, and Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).

Responsible Minerals

Automotive companies make use of heavy metals, which brings them under direct scope of acts such as Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the EU Conflict Minerals Regulation. Both acts require companies to disclose the use of tin, tungsten, tantalum, and gold in the products they create. They must also determine if these materials are ethically sourced.

Cobalt

The mineral cobalt is typically produced as a byproduct of other mineral mining operations, notably copper and nickel. It's used as a key component in lithium-ion batteries, vital for powering electric cars and in the creation of superalloys. While cobalt is not regulated as a responsible mineral, the majority of cobalt mining operations are based in the Democratic Republic of the Congo, and non-governmental organizations are pushing for cobalt's inclusion as a mineral of concern. Many companies have updated their supplier requirements to include tracking and reporting on sources of cobalt as a condition of business, often using the Extended Minerals Reporting Template (EMRT), designed by the Responsible Minerals Initiative.

Proposition 65

Proposition 65 is a state of California act designed to protect the public from toxic chemical exposure. The use of heavy metals in the automotive industry means that there is potential for exposure to substances known to impact reproductive health or cause cancer and birth defects. Tracking substance data is vital for automotive manufacturers looking to do business in California. This is of particular importance for aftermarket and spare parts suppliers, in addition to servicing and maintenance operations.

The EU Biocidal Products Regulation

Biocidal products are used to protect humans from pests, bacteria, and other organisms that could cause harm. These products (such as the ones used to treat automotive articles like carpets and seating) contain active



substances (biocides) that require an authorization before they can be placed on the market. Surveying suppliers for this data is vital for automotive manufacturers.

The WFD & Substances in Articles Database

The EU WFD and its accompanying Substances of Concern In articles, as such or in complex objects (Products) (SCIP) database regulate how the EU manages waste and encourages more sustainable manufacturing and production processes. The WFD also defines the term “end-of-life vehicle” and provides a greater framework for safe disposal. REACH SVHC data is necessary in order to meet WFD requirements.

The Countering America’s Adversaries Through Sanctions Act

Automotive manufacturers purchase materials from high-scrutiny sectors, which has brought significant attention to issues such as human trafficking and slavery. Under the Countering America’s Adversaries Through Sanctions Act (CAATSA), U.S. companies cannot conduct business with listed entities, and face steep penalties if they are found to be non-compliant. CAATSA also contains provisions for human trafficking and slavery, corruption, and other environmental, social, and governance (ESG) initiatives.

The Production Part Approval Process

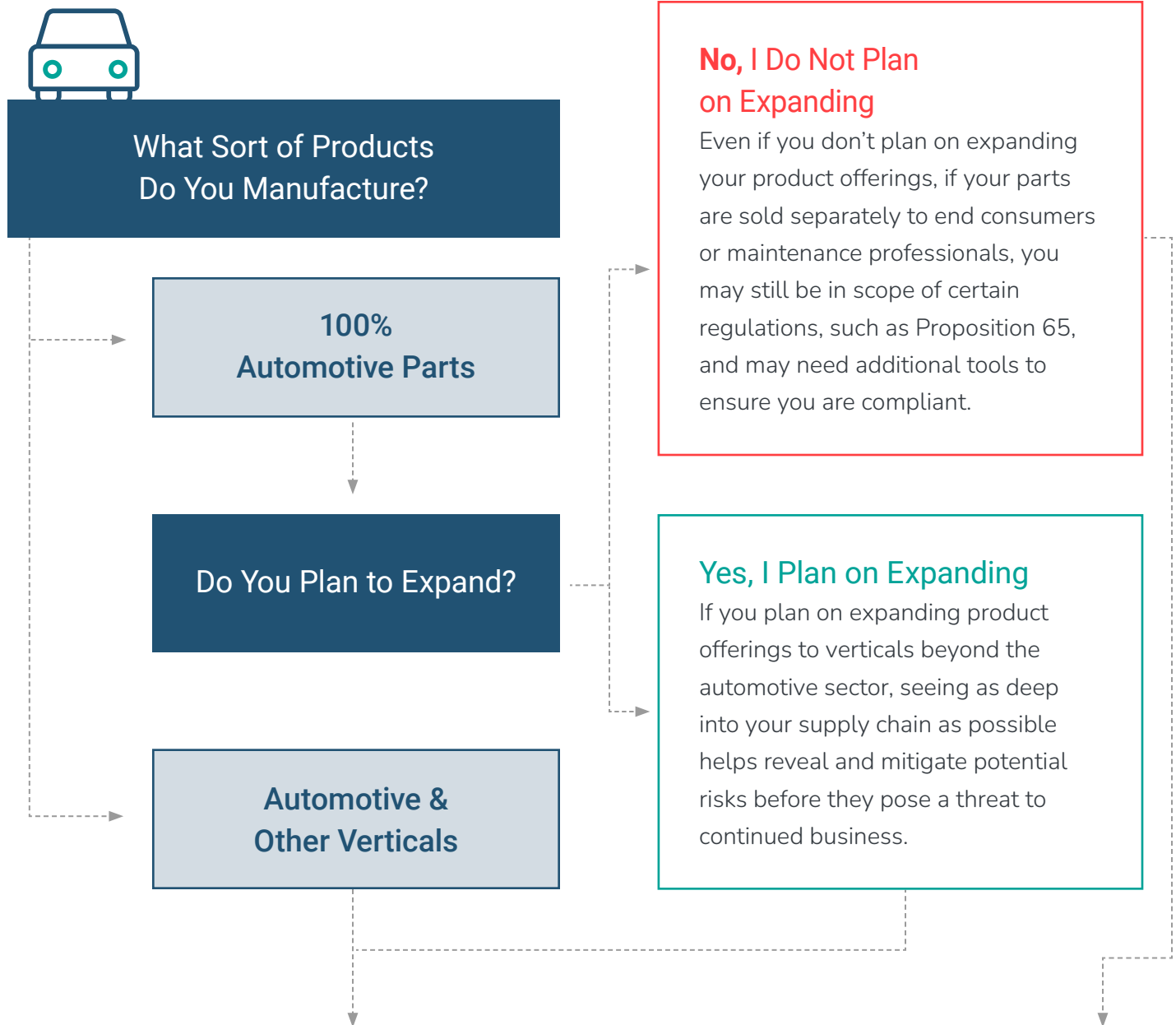
The production of many automotive component parts is outsourced by end vehicle manufacturers, which means that a Production Part Approval Process (PPAP) is necessary. This process is necessary whenever:

- ▶ A new part is produced
- ▶ Parts undergo engineering changes
- ▶ A correction is made to a previous PPAP submission
- ▶ Part designs or processes are changed
- ▶ The source of a subcontracted material or service changes
- ▶ Parts are produced at a new or additional location

Data entry in IMDS is often a contractual requirement of the PPAP. Without a centralized database, the process is time-consuming and tedious.



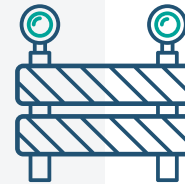
What Are Your Products in Scope Of?



Regulatory Roadblocks — Additional Tools Needed

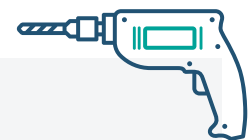
If you manufacture products for a range of verticals, you may be in scope of a variety of regulations and directives not covered by the IMDS:

- ▶ Medical (EU Medical Devices Regulation)
- ▶ Aerospace (National Aerospace Standard)
- ▶ Defense (U.S. Department of the Interior's Strategic and Critical Materials Inventory)
- ▶ Electronics (EU RoHS)
- ▶ Industrial equipment (U.S. FAR)
- ▶ Oil and gas (U.S. Toxic Substances Control Act)



Additional Solutions May Be Needed

While the IMDS provides automotive manufacturers with a convenient tool for meeting their specific ELV/RRR needs, it doesn't address supplier product compliance management. Meeting additional obligations can become a costly and time-consuming process without the use of additional tools and services.



Tackling Expanding Requirements With Assent

Automotive manufacturers must manage complex, evolving requirements to get their products to market on time, but disconnected data and manual workflows create gaps that can increase the risk of disruption.

Assent is the leading AI-native platform for supply chain sustainability and compliance. We help automotive manufacturers address existing data and compliance gaps, adopt continuous supplier engagement and automation strategies, and mitigate risk with a proactive approach to compliance.

[Book a Demo](#)





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