CIVD Directive

Material Compliance

Directive to ensure material compliance require-ments for vehicles of the Caravanning Industry

Version: 11.2026

This English version was translated from the German original with the assistance of AI. In case of discrepancies, the German version shall prevail.

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1. Preamble

This CIVD Directive – Material Compliance specifies the requirements for prohibited, restricted and declarable substances in products, materials, components and packaging. It serves to ensure compliance with statutory, regulatory, customer-specific and company-specific requirements and to ensure a transparent and sustainable supply chain. The requirements encompass substance assessment, provision of material declarations, documentation of compliance and management of changes relevant to conformity.

2. Document management*

Change history					
Date:	**Old version**	**New version**	**Prepared by**	**Approved by**	**Changes made**
27.06.2016	1.0		Mustermann	Musterfrau	Preparation of MC specification
24.05.2017	1.0	1.2			Introduction and inclusion of Toy Safety Directive
30.11.2018	1.2	1.4			Updated REACH links, adjusted ELV exemptions list, Regulation (EC) No 1935/2004 – food contact materials and articles
12.09.2019	1.4	1.41			New POP Regulation; Packaging Act added. RoHS and ELV tables revised. ELV and RoHS exemption tables updated.
20.11.2020	1.41	1.5			Drinking Water Ordinance amended; RoHS and ELV exemption tables updated
14.03.2022	1.5	1.6			RoHS exemptions updated. SCIP added to Section 3.4.1
23.02.2024	1.6	1.7			Definitions and legislation (Batteries Regulation) updated; selected passages revised
30.06.2026	1.7	2			

*Based on ISO/IEC/IEEE 29148

3. Purpose / Scope / Updates

Purpose

This document defines the requirements for suppliers to ensure that products and activities comply with applicable material compliance requirements.

This material compliance specification applies to all physical objects supplied by suppliers, such as:

- Substances
- Preparations
- Articles
- Products
- Packaging

Synonyms used:

- Materials
- Materials
- Components
- Assemblies
- Services affecting material compliance

Updates

The supplier is obliged to check at least once a year whether an updated version of the material compliance specification is available. A revised material compliance specification supersedes its predecessor and takes effect immediately. The CIVD does not notify suppliers of changes to the material compliance specification.

4. Terms / Definitions and Abbreviations

Change

Sunset date

Battery:
a device delivering electrical energy generated by the direct conversion of chemical energy, with internal or external storage, consisting of one or more non-rechargeable or rechargeable battery cells, modules or packs, and including a battery that has been prepared for re-use or repurposing, repurposed or remanufactured. (Regulation (EU) 2023/1542, Article 3(1))

Biocidal product:
- any substance or mixture, in the form in which it is supplied to the user, consisting of, containing or generating one or more active substances, with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action;
- any substance or mixture generated from substances or mixtures which do not themselves fall under the first indent, to be used with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action. (Regulation (EU) No 528/2012, Article 3(1)(a))

Restricted substances:
Restricted substances are substances whose use is permitted only under specified conditions due to statutory or regulatory requirements, or whose use is prohibited in certain products, applications or concentrations. (Source: own definition)

Substances subject to declaration:
Substances or groups of substances subject to information, reporting or declaration obligations under statutory, regulatory or customer-specific requirements. The specific obligation arises from the applicable regulation (e.g. REACH, SCIP, RoHS, TSCA, POP, GADSL, IEC 62474) and the thresholds and conditions of use stipulated therein. (Source: own definition)

Article:
an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition. (Regulation (EC) No 1907/2006, Article 3(3))

Portable battery:
a battery that is sealed, weighs 5 kg or less, is not designed specifically for industrial use and is neither an electric vehicle battery, an LMT battery nor an SLI battery. (Regulation (EU) 2023/1542, Article 3(9))

Homogeneous material
a material of uniform composition throughout, or a material consisting of a combination of materials that cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes. (Directive 2011/65/EU, Article 3(20))

Supplier

Material Compliance (MC)

Material declaration

Evidence / documented information

Product
any item which, whether in return for payment or free of charge, is supplied or made available, whether for itself or in combination with other items, including in the context of providing a service, and is intended for consumers or is likely, under reasonably foreseeable conditions, to be used by consumers even if not intended for them. (Regulation (EU) 2023/988, Article 3(1))

Substance
a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition. (Regulation (EC) No 1907/2006, Article 3(1))

Partial declaration
Declaration of selected declarable or restricted substances or substance groups above specified limits without disclosing the complete chemical composition. (Derived from DIN EN IEC 62474)

Prohibited substance

Packaging
an item, irrespective of the materials from which it is made, intended to be used by an economic operator for the containment, protection, handling, delivery or presentation of products to another economic operator or to an end-user, and which can be differentiated by packaging format on the basis of its function, material and design, including:

(a) an item that is necessary to contain, support or preserve a product throughout its lifetime without being an integral part of the product, and which is intended to be used, consumed or disposed of together with the product;

(b) a component or ancillary element of an item referred to in point (a) which is integrated into that item;

(c) an ancillary element of an item referred to in point (a) which is hung directly on, or attached to, a product and which performs a packaging function without being an integral part of the product, and which is intended to be used, consumed or disposed of together with the product;

(d) an item designed and intended to be filled at the point of sale for the purpose of handing over the product, also referred to as “service packaging”;

(e) a disposable item sold and filled, or intended and designed to be filled, at the point of sale and which performs a packaging function;

(f) a permeable tea or coffee bag or a permeable bag for another beverage, or a single-serve unit for a tea or coffee system or another beverage system which softens in use and is intended to be used and disposed of with the product;

(g) an impermeable single-serve unit for a tea or coffee system or another beverage system intended for use in a machine and which is used and disposed of together with the product;
(Regulation (EU) 2025/40, Article 3(1)(1))

Impurity
An unintended constituent of a substance or material in its manufactured state. Impurities may originate from starting materials or arise from side reactions or incomplete reactions during manufacture. They are not deliberately added to the substance and do not serve to meet a technical requirement. (Source: own definition)

Preparation
Mixtures, blends or solutions consisting of two or more substances.
(Regulation (EC) No 1907/2006, Article 3(2))
Abbreviations

Abbreviation	Meaning
MC	Material Compliance
SVHC	Substance of Very High Concern
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
RoHS	Restriction of Hazardous Substances
POP	Persistent Organic Pollutants
PFAS	Per- and Polyfluoroalkyl Substances
CLP	Classification, Labelling and Packaging
SCIP	Substances of Concern In Products
IEC	International Electrotechnical Commission

5. Objectives and Compliance Requirements

a. Legal compliance:
b. Customer / market requirements:
c. Supply chain transparency:
d. Sustainability:
e. Change management:

6. Material Compliance Process Requirements

a. All materials must be assessed against current substance regulations.
b. Material declarations must be provided before initial approval.
c. Suppliers must provide valid evidence of compliance and keep it up to date.
d. Changes relevant to compliance are subject to an approval requirement.
e. Material compliance records must be retained for at least ten years after the last delivery.

7. Regulatory Substance Requirements

The supplier is obliged to obtain the current laws and standards independently.

If legislative amendments have not yet been incorporated into this specification, this does not release suppliers from their duty to take such amendments into account and comply with the applicable legal requirements in their current version.

The material compliance specification requirements are equivalent to all other product requirements.

The current version of the regulations, directives and laws referred to shall always apply.

8.1 Substance restrictions – relevant for all products

The substance requirements described in this section apply to all substances, preparations and articles which:

- are installed in motor caravans or caravans under the manufacturer's responsibility;
- are intended for installation in motor caravans or caravans.

8.1.1 Regulation (EC) No 1907/2006 REACH – Annex XIV – List of substances subject to authorisation

The inclusion of a substance from the list of substances of very high concern in Annex XIV of the REACH Regulation results, at the end of the process, in an authorisation requirement for that substance. Following a transitional period, the substance may only be used with an authorisation or its use is restricted.

Explanations of the terms “latest application date” and “sunset date” can be found in Chapter 4, Terms / Definitions and Abbreviations.

The current Annex XIV of the REACH Regulation can be accessed at the following link:

https://echa.europa.eu/de/authorisation-list

8.1.2 Regulation (EC) No 1907/2006 REACH – Annex XVII – List of restricted substances

Annex XVII of the REACH Regulation lists substances whose use in defined applications is restricted by the legislator.

The current Annex XVII of the REACH Regulation can be accessed at the following link:

https://echa.europa.eu/de/substances-restricted-under-reach

8.1.3 Regulation (EU) No 2023/1464 – Formaldehyde

From 6 August 2027, a binding limit of 0.062 mg/m^3 will apply in the EU to formaldehyde concentrations in the interior air of road vehicles (REACH Annex XVII, entry 77, as amended by Regulation (EU) 2023/1464). Emission limits for articles used in vehicle interiors will already apply from 6 August 2026 (Appendix 14, point 1, REACH):

- 0.062 mg/m^3 for furniture and wood-based articles;
- 0.080 mg/m^3 for all other articles.

The ECHA guidance "Guidelines for the measurement of formaldehyde releases from articles and formaldehyde concentrations in the interior of vehicles" (November 2025 edition) is to be used as the principal interpretative guidance for the measurement strategy and its implementation.

8.1.4 Chemicals Prohibition Ordinance – ChemVerbotsV

The Chemicals Prohibition Ordinance (ChemVerbotsV) contains national prohibitions and restrictions on the placing on the market of certain hazardous substances, mixtures and articles, in addition to EU substance restrictions, particularly those under Regulation (EC) No 1907/2006 (REACH). It also sets out requirements for supplying certain hazardous substances and mixtures.

For material compliance, the national prohibitions on placing on the market pursuant to Section 3(2) in conjunction with Annex 1 of the ChemVerbotsV are of particular relevance. Table 1: Substance restrictions under the Chemicals Prohibition Ordinance

Substances / mixtures
Dioxins and furans
Biopersistent fibres

The current requirements and the listed exemptions are set out in the legislative text.

http://www.gesetze-im-internet.de/chemverbotsv_2017/index.html

8.1.5 Regulation (EU) No 2019/1021 – POP

Regulation (EU) 2019/1021 on persistent organic pollutants (POP Regulation) is intended to protect human health and the environment against persistent organic pollutants. In particular, it implements obligations under the Stockholm Convention on Persistent Organic Pollutants.

The manufacture, placing on the market and use of substances listed in Annex I of the Regulation are generally prohibited; restrictions apply to substances listed in Annex II. The Regulation also contains requirements for limiting releases and handling waste containing or contaminated with persistent organic pollutants.

For material compliance, the current substance entries, limits and exemptions in Annexes I and II of the Regulation must be observed in particular.

Further information on the Stockholm Convention is available on its official website at the following link:

http://chm.pops.int/

8.2 Substance restrictions – applicable to products in different areas of application

Unlike the substance restrictions in Chapter 8.1, the supplier must verify whether its products fall within the scope of the provisions described in this chapter. If the supplier is unable to clarify this independently, it must inform the customer in writing without undue delay.

8.2.1 Regulation (EU) 2025/40 – Packaging Regulation

Regulation (EU) 2025/40 on packaging and packaging waste was published in the Official Journal of the European Union on 22 January 2025, entered into force on 11 February 2025 and replaces Packaging Directive 94/62/EC.

A central aspect of this Regulation is the restriction of substances in packaging. In addition to the existing restrictions on heavy metals such as lead, cadmium, mercury and hexavalent chromium, whose combined concentration must not exceed 100 mg/kg, limits are now also established for per- and polyfluoroalkyl substances (PFAS) in food-contact packaging.

These new limits apply from 12 August 2026 and are specified as follows:

a) 25 ppb for PFAS measured by targeted PFAS analysis (excluding polymeric PFAS);

b) 250 ppb for the sum of PFAS measured as the sum of targeted PFAS analysis (excluding polymeric PFAS);

c) 50 ppm for PFAS (including polymeric PFAS); where the total fluorine content exceeds 50 mg/kg.

8.2.2 Packaging Law Implementation Act – VerpackDG

The Packaging Law Implementation Act (VerpackDG) serves to implement and supplement Regulation (EU) 2025/40 on packaging and packaging waste at national level. It entered into force on 12 August 2026 and replaced the previous Packaging Act (VerpackG).

The VerpackDG applies to packaging falling within the scope of Regulation (EU) 2025/40. In particular, it contains national provisions on registration, participation in collection systems, data reporting and declarations of completeness, as well as on the take-back, collection and recovery of packaging waste. It also includes supplementary provisions on market surveillance and enforcement of the requirements of Regulation (EU) 2025/40.

The economic operators concerned must examine which obligations arise for the packaging they make available under Regulation (EU) 2025/40 and the VerpackDG.

The full legislative text can be found at the following link:

https://www.gesetze-im-internet.de/verpackdg/

8.2.3 End-of-Life Vehicles Directive (ELV)

DIRECTIVE 2000/53/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
of 18 September 2000 on end-of-life vehicles.über Altfahrzeuge

> Hinweis zur Anwendung der Altfahrzeug Verordnung (EU) 2026/1738
>
> Die neue EU-Altfahrzeugverordnung über die Anforderungen an die kreislauforientierte Konstruktion von Fahrzeugen und über die Bewirtschaftung von Altfahrzeugen, veröffentlicht am 24. Juli 2026 als Verordnung (EU) 2026/1738, ersetzt die frühere Altfahrzeugrichtlinie.
>
> Sie trat am 13. August 2026 in Kraft und gilt für Motocaravans nach einer Übergangsfrist von 36 Monaten, also ab dem 13. August 2029.

The substance prohibitions under Article 4(2)(a) apply to vehicles (including motor caravans), including their components and materials.
Items of equipment not specifically manufactured for use in vehicles or motor caravans are exempt from the substance prohibitions.

The list of exemptions from the substance prohibitions is provided in Annex 1.

The ELV substance restrictions refer to the maximum concentrations in the homogeneous material of each article.

Table 2: Substance restrictions under the ELV Directive

Substance groups	Maximum concentration in homogeneous material in percent
Cadmium and cadmium compounds	0,01%
Hexavalent chromium (Cr6+) and Cr6+ compounds	0,10%
Lead and lead compounds	
Mercury and mercury compounds	

8.2.4 Directive 2011/65/EU – RoHS

Directive 2011/65/EU of the European Parliament and of the Council regulates the restriction of the use of certain hazardous substances in electrical and electronic equipment.

The substance restrictions of Directive 2011/65/EU refer to the maximum concentrations in homogeneous materials.

Table 3: Substance restrictions under Directive 2011/65/EU

Substance groups / substances	Maximum concentration in homogeneous material
Cadmium and cadmium compounds	0,01%
Hexavalent chromium (Cr6+) and Cr6+ compounds	0,10%
Lead and lead compounds	
Mercury and mercury compounds	
Polybrominated diphenyl ethers (PBDE)	
Polybrominated biphenyls (PBB)	
Bis(2-ethylhexyl) phthalate (DEHP)	
Benzyl butyl phthalate (BBP)	
Dibutyl phthalate (DBP)	
Diisobutyl phthalate (DIBP)	

If exemptions under Annexes III and IV of the RoHS Directive are required to achieve conformity, CIVD members require that these exemptions be identified and assigned accordingly.

8.2.5 Regulation (EU) No 2023/1115 – EU Deforestation Regulation

The EU Regulation on deforestation-free supply chains entered into force on 29 June 2023 and is expected to replace the previous EU Timber Regulation (Regulation (EU) No 995/2010) on 30 December 2026. Pursuant to Article 1(1) of the Regulation, it applies to the relevant commodities cattle, cocoa, coffee, oil palm, rubber, soya and wood listed in Annex I, and to the relevant products that contain, have been fed with or have been

made using these commodities. Particular due diligence obligations are imposed on operators and traders pursuant to Article 8 of the Regulation.

All goods imported into the EU, exported from the EU or traded within the European internal market must comply with the requirements of the EU Deforestation Regulation. Pursuant to Article 3, relevant commodities and products may be placed or made available on the EU market or exported from the EU only if they:

- are deforestation-free since 31 December 2020 (pursuant to Article 3(a) of the Regulation);
- have been produced in accordance with the relevant legislation of the country of production (pursuant to Article 3(b) of the Regulation); and
- are covered by a due diligence statement (pursuant to Article 3(c) and Article 4(2) of the Regulation).

8.2.6 Regulation (EU) 2023/1542 – Batteries Regulation 2023

The Regulation concerning batteries and waste batteries, repealing Directive 2006/66/EC and amending Regulation (EU) 2019/1020, entered into force on 17 August 2023. Annex I of the Regulation restricts the use of mercury, cadmium and lead.

Table 4: Maximum concentrations for batteries

Pure substances	Maximum concentration in the article in percent	**Application restrictions**
Mercury and mercury compounds	0,0005%	Batteries (in devices and means of transport)
Cadmium and cadmium compounds	0,002%	Portable batteries (in devices and means of transport)
Lead and lead compounds	0,01%	Portable batteries

8.2.7 Directive (EU) 2020/2184 and Drinking Water Ordinance (TrinkwV) – Materials in contact with drinking water

Materials and products intended to come into contact with water for human consumption must comply with Directive (EU) 2020/2184 and the German Drinking Water Ordinance (TrinkwV).

Under the Drinking Water Ordinance, materials in contact with drinking water must, in particular, not compromise the protection of human health, adversely affect the colour, odour or taste of the water, enhance microbial growth or release substances into the water in quantities greater than unavoidable. In Germany, these requirements are specified in the assessment criteria of the German Environment Agency (Umweltbundesamt, UBA).

For motor caravans and caravans, the following standards and regulations in particular must be taken into account insofar as they are applicable to the product or its intended use:

- DIN 2001-2:2025-06: Drinking water supply from small installations and non-stationary installations – Part 2: Non-stationary installations – Guidelines for requirements for drinking water, planning, construction, operation and maintenance of installations;
- DIN EN 16421:2015-05: Influence of materials on water for human consumption – Enhancement of microbial growth;
- DVGW Code of Practice W 270: Microbial growth on materials intended for use in drinking water systems – Testing and assessment;
- the applicable assessment criteria of the German Environment Agency for materials in contact with drinking water, particularly plastics and other organic materials (KTW-BWGL), metallic materials, enamels and ceramic materials.

Article 11 of Directive (EU) 2020/2184 established a harmonised European system for materials and products in contact with drinking water. The European legal acts based on it include, in particular, positive lists of permitted starting substances, compositions and constituents, procedures and methods for testing and assessing final materials, and requirements for conformity assessment and product marking. The European system applies from 31 December 2026.

The requirements are specified in particular by the following legal acts:

- Implementing Decision (EU) 2024/365: Methods for testing and accepting starting substances, compositions and constituents for inclusion in the European positive lists;
- Implementing Decision (EU) 2024/367: European positive lists of authorised starting substances, compositions and constituents;

- Implementing Decision (EU) 2024/368: Procedures and methods for testing and accepting final materials;
- Delegated Regulation (EU) 2024/369: Procedure for including starting substances, compositions and constituents in the European positive lists or removing them from those lists;
- Delegated Regulation (EU) 2024/370: Conformity assessment procedures for products and requirements for the conformity assessment bodies involved;
- Delegated Regulation (EU) 2024/371: Harmonised requirements for marking compliant products.

Products placed on the market for the first time from 31 December 2026 must be certified and marked under the European procedure. A transitional arrangement applies to products for which a correct confirmation of conformity based on the UBA assessment criteria and/or other national regulatory documents was issued by 31 December 2026. During the transitional period, national requirements continue to apply to these products; existing confirmations of conformity may, subject to the applicable conditions, be maintained or extended until 31 December 2032 at the latest. From that date, these products must also be certified under the European procedure. German Environment AgencyUmweltbundesamt

All materials and components intended to come into contact with drinking water must meet the applicable hygienic and material-related requirements.

8.2.8 Biocidal Products Regulation (EU) No 528/2012

The Biocidal Products Regulation (BPR, Regulation (EU) No 528/2012) concerning the making available on the market and use of biocidal products entered into force on 1 September 2013. It harmonises the authorisation of biocides in the European Union through a multi-stage procedure.

Every supplier to a CIVD member is obliged to comply fully with the specifications and obligations for:

• Biocidal products

• Treated articles

if its product falls within the scope of the Regulation.

All materials and components treated with substances having a biocidal effect must comply with the requirements of the EU Biocidal Products Regulation.

Example: toilet tank, air ducts of air-conditioning systems

8.2.9 Regulation (EC) No 1935/2004 – Food contact materials and articles

Regulation (EC) No 1935/2004 of 27 October 2004 on materials and articles intended to come into contact with food is a framework regulation applying to all food contact materials.

Its scope includes:

Materials and articles which, in their finished state:

(a) are intended to come into contact with food;

(b) are already in contact with food and are intended for that purpose;

(c) can reasonably be expected, under normal or foreseeable conditions of use,

to come into contact with food or transfer their constituents

to food.

Examples: shelves, drawers, compartments etc. in refrigerators, cutting boards, crockery, cutlery etc.

The general requirements of the Regulation are as follows:

Materials and articles, including active and intelligent materials and

articles, must be manufactured in accordance with good manufacturing practice so that, under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities which could:

(a) endanger human health;

(b) bring about an unacceptable change in the composition of the food; or

(c) bring about a deterioration in the organoleptic characteristics of the food.

The regulatory instruments referred to in Article 5 of the Regulation include:

- Lists of substances authorised for use in manufacture (positive lists)
- Purity criteria for authorised substances
- Special conditions of use for authorised substances
- Labelling requirements

All materials and components coming into contact with food must comply with Regulation (EC) No 1935/2004. For materials and components coming into contact with drinking water, see Section 8.2.7.

8.3 Substances Subject to Declaration

8.3.1 SVHC Candidate List

The current version of the official SVHC Candidate List under

the REACH Regulation can be accessed at the following address:

https://echa.europa.eu/de/candidate-list-table

Pursuant to Article 33 of the REACH Regulation, every supplier has the following obligation:

(1) Any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0.1% weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article, including, as a minimum, the name of that substance.

All components, spare parts, accessories and packaging are subject to this information obligation.

If the supplied articles contain substances of very high concern published on the Candidate List under Article 59(1) of the REACH Regulation in a concentration exceeding 0.1% by weight, the contractor is obliged to provide all information required under Article 33(1) of the REACH Regulation without being asked, together with the delivery. This also applies if a substance is added to the Candidate List during an ongoing supply relationship.

This information must be provided free of charge to private consumers upon request within 45 days.

Following the decision of the European Court of Justice, the principle “once an article, always an article” applies. As soon as an article or constituent article exceeds the concentration threshold of 0.1%, the presence of the SVHC Candidate List substance must be communicated.

8.3.2 SCIP database

Pursuant to Article 9(1)(i) of Directive 2008/98/EC (Waste Framework Directive), suppliers of articles containing substances of very high concern (SVHCs) on the REACH Candidate List in a concentration above 0.1% by weight are required to submit the information required under Article 33(1) REACH to ECHA for inclusion in the SCIP database.

As part of Environmental Omnibus VIII, the European Commission has proposed abolishing the SCIP notification obligation (COM(2025) 986; 2025/0394(COD)). The Council supports its abolition in its negotiating mandate of 24 June 2026. However, the

legislative procedure has not yet been completed. Until an appropriate amendment enters into force, the existing SCIP notification obligations continue to apply unchanged.

9. Ancillary Production and Operating Materials

9.1.1 Safety data sheets (SDS)

The safety data sheet is the central element of communication along the supply chain for hazardous substances and mixtures.

It provides important information about the following characteristics:

- Product identity
- Potential hazards
- Safe handling
- Preventive measures
- Measures in the event of danger.

The requirements for the content and format of the safety data sheet are stipulated in Article 31 and Annex II of the REACH Regulation.

The supplier of a hazardous substance or mixture is responsible for ensuring that the safety data sheet is technically correct and complete.

The safety data sheet shall be made available to the CIVD member free of charge, on paper, in electronic form or as a download, no later than the date of the first delivery.

Suppliers must update the SDS without delay (Article 31(9)) if:

- new information becomes available that may affect risk management measures;
- an authorisation has been granted or refused;
- a restriction has been imposed.

The revised version must be provided to the CIVD member if that member has received deliveries within the previous 12 months.

10. Other Requirements

10.1.1 Indoor emissions (VOC)

Suppliers are expected to exercise particular care with respect to

• materials

• components

• accessories

intended for vehicle interiors in relation to possible emissions of volatile organic compounds (VOC). Volatile organic compounds from hydrocarbons may occur in natural products such as wood and also in plastics due to raw materials and manufacturing processes.

If the article contains such volatile organic compounds that could contribute to indoor emissions in vehicles, the next customer in the supply chain must be informed.

10.1.2 Directive 2009/48/EC – Toy Safety Directive

Directive 2009/48/EC applies to products intended or designed, whether or not exclusively, for use in play by children under 14 years of age. The words “whether or not exclusively” also cover products that are not ordinarily regarded as toys but may be regarded as such by children.

The Directive prohibits the use of so-called CMR substances (carcinogenic, mutagenic or toxic to reproduction) in all accessible parts of toys. Allergenic fragrances with high allergenic potential are also completely prohibited, while those with lower potential must be indicated on the toy.

11. References

Legislation

- **DIRECTIVE 2011/65/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**
  of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (hereinafter referred to as “RoHS”)
- **DIRECTIVE 2000/53/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**
  of 18 September 2000 on end-of-life vehicles (hereinafter referred to as “ELV”)
- **DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 November 2008 on waste and repealing certain Directives**
- **REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives**

91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (hereinafter referred to as the "REACH Regulation")

- **REGULATION (EU) 2019/1021 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 June 2019 on persistent organic pollutants (hereinafter referred to as "POP")**
- **REGULATION (EC) No 1272/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (hereinafter referred to as "CLP")**
- **REGULATION (EU) 2025/40 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (hereinafter referred to as the "Packaging Regulation")**
- **REGULATION (EU) 2023/1115 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (hereinafter referred to as the "Deforestation Regulation")**
- **REGULATION (EU) No 995/2010 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market (hereinafter referred to as the "EU Timber Regulation")**
- **REGULATION (EU) 2023/1542 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC**
- **REGULATION (EU) 2023/988 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 10 May 2023 on general product safety, amending Regulation (EU) No 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and of the Council, and repealing Directive 2001/95/EC of the European Parliament and of the Council and Council Directive 87/357/EEC**
- **REGULATION (EC) No 1935/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC**
- **REGULATION (EU) No 528/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 22 May 2012 concerning the making available on the market and use of biocidal products**

- **Ordinance on Prohibitions and Restrictions on the Placing on the Market and Supply of Certain Substances, Mixtures and Articles under the Chemicals Act (Chemicals Prohibition Ordinance – ChemVerbotsV)**
- **Ordinance on the Quality of Water Intended for Human Consumption (Drinking Water Ordinance – TrinkwV)**
- **COMMISSION REGULATION (EU) 2023/1464 of 14 July 2023 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council as regards formaldehyde and formaldehyde releasers**

Standards

- **DIN EN IEC 62474:2022-10 (VDE 0042-4:2022-10) Material declaration for products of and for the electrotechnical industry**
- **DIN EN IEC 63000:2019-05 (VDE 0042-12:2019-05) Technical documentation for the assessment of electrical and electronic products with respect to the restriction of hazardous substances**
- **SO/IEC/IEEE 29148:2018** Systems and software engineering — Life cycle processes — Requirements engineering

Sources / Guidance

Platform for European regulations, directives and decisions in all available versions and official European languages – enter the year and number of publication in the search form:
http://eur-lex.europa.eu/

Support section of the European Chemicals Agency (ECHA):
https://echa.europa.eu/support/guidance

REACH-CLP-Biocides Helpdesk – German national information service:
https://www.reach-clp-biozid-helpdesk.de/

REACH Helpdesk – German Environment Agency:http://www.reach-info.de

REACH@Baden-Württemberg
https://www.reach.baden-wuerttemberg.de/

Platform for German legislation
https://www.gesetze-im-internet.de/

12. Intellectual Property Rights

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