**Using the IAEG AD-SRT - Frequently Asked Questions (V1)**

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To open the information below, click on the arrow next to each topic to reveal the information.

# Introduction

This document includes frequently-asked questions (FAQs) about the Aerospace and Defence[[1]](#endnote-2) Substances Reporting Tool (AD-SRT), and its use. The AD-SRT is a data reporting tool that is compatible with IPC-1754 (*Materials and Substances Declaration for Aerospace and Defense and Other Industries*), and is intended for companies in the aerospace and defence supply chain to use for materials and substances declarations. Further, the AD-SRT is designed be used with the Aerospace and Defence Declarable Substances List (AD-DSL) in providing substance declarations. The AD-SRT, AD-DSL and other supporting tools and data developed by the International Environmental Group (IAEG®) are provided for voluntary use.

To use this document, expand the title sections by selecting the arrows on the left of each title to see content in each section. IAEG will update this document to address additional comments and feedback when they are received. If your question/issue is not covered, please contact the requester of your declaration, or if there is no requester, send an email to questions@iaeg.com. (**Notice:** **When sending the email to IAEG, please do not attach any completed AD-SRT or supporting files to your e-mail**)

# general questions about the AD-SRT

## Where can I find additional data on the AD-SRT?

### IAEG is the authority and owner of the AD-SRT. All information related to the AD-SRT is available at [www.iaeg.com](http://www.iaeg.com/).

## Does the AD-SRT reflect substance regulatory derogations/exemptions applicable to aerospace & defence product applications or uses?

### No, the AD-SRT does not reflect this data.

## How do we know the AD-SRT that we are completing contains the latest version of the AD-DSL?

### The version of the AD-DSL in the AD-SRT is identified in the AD-SRT at the bottom of the Requester-Supplier tab. The AD-DSL version number listed in that tab can be compared to the version number of the latest AD-DSL posted on the IAEG Chemical Reporting Website: <http://www.iaeg.com/chemicalrpt/>

# using the ad-srt

## Are there resources to assist in completing a declaration using the AD-SRT?

### IAEG recommends utilizing IAEG declaration tools (e.g., support documents and videos), while working with requesters and/or suppliers in devloping and implementing a declaration process with realistic expectations and schedules. The IAEG tools are being made available on <http://www.iaeg.com/chemicalrpt/>.

## What are some recommended steps in developing a declaration process to complete AD-SRTs for our products?

### IAEG recommends engaging internal stakeholders early on to determine what data is needed to complete declarations for company products. Stakeholders should meet periodically to support the development, communication and implementation of any internal plans, including timing, needed resources and addressing challenges to meet company goals. The stakeholders and plans may include engaging with customers, suppliers and/or utilizing consultants or declaration tool providers to assist in developing/implementing a declaration process. If the company has many products requiring declarations, it may also require additional resources and budget to be successful with implementing new/expanded declaration capabilities.

## Can multiple declarations for a list of products be submitted on one AD-SRT?

### Yes. The AD-SRT enables users to fill out one declaration for multiple single products and/or product groups. For instance, a single AD-SRT may contain 10 single product declarations and 20 product group declarations.

## Why are some AD-SRT data fields mandatory vs. optional?

### According to the IPC-1754 standard, completing only the mandatory data fields is needed to create a complete declaration. The optional fields may be completed on a case-by-case basis, as determined by business considerations (e.g., as required by agreed-to supplier-requester contractual requirements).

## Which AD-SRT data fields are considered “mandatory“?

### There are two types of mandatory fields in the AD-SRT. The first type is mandatory for all declarations; those are identified with a single asterisk - "\*". Conditionally mandatory data fields must be filled out only under certain circumstances; those are marked with a double asterisk ("\*\*"). For example, Supplier Contact information must be filled out for all declarations (mandatory), but Requester Contact information is only required for Request/Reply mode declarations (conditionally mandatory). See the “General Instructions“, located in the AD-SRT Instructions tab for additional information.

## What if I cannot complete a mandatory field in the AD-SRT?

### If you cannot complete a mandatory field, then your declaration may be rejected by the requester. If some data is not available at the time that you are submitting the form, then "unknown" may be a valid option for some of the mandatory data fields, when allowed. In those cases, or when uncertain how to fill out a field, it is recommended that the requester be contacted for additional guidance.

## Do I have to complete the data in the AD-SRT in a certain order?

### It is not necessary to input data in a specific order as long as all mandatory data elements are completed.

## How can a specific derogation/exemption applicable to a supplied product be shared with the requester in the AD-SRT?

### Utilize Tab 6 "Attachment" to inform the requester of chemical use derogations/exceptions, etc., that may be applicable to the declaration.

# requester-supplier data

## What is a "Distribute" mode declaration? What is "Request and Reply" mode declaration?

### Distribute mode is used when a supplier desires to provide declarations for their products, and publish a declaration in anticipation of receiving specific requests. The supplier then “distributes“ their declaration by making it available (e.g., by posting, emailing, etc). In Request/Reply mode, the supplier responds to a specific request or requirement to provide a declaration, and may need to follow requirements agreed-to with its requester.

## Who is responsible for filling in the requester data, or is it optional?

### The requester must complete both Requester and Supplier Contact data for a Request/Reply mode declaration. The supplier should verify and/or update the Supplier Contact data, if needed. The supplier must complete the Supplier Contact data for Distribute mode declarations.

## Is the Document Identification (ID) provided by the requester, or supplier or both?

### It is an optional data field for the requester and supplier to manage their declaration data exchange. The document ID data fields are available to be populated based on the business-to-business agreement between the requester and supplier. There are two sets of fields for each company to create and manage their own data.

## How and where can I find my company‘s Data Universal Numbering System (DUNS), Commercial and Government Entity (CAGE) or other company identification number?

### Please contact your company's organization or person responsible for maintaining the supplier identification codes (DUNS, CAGE, etc.). Typically, those codes may be managed by such organizations as supply chain or purchasing that are likely to have to provide it to external parties (e.g., customers).

## Does the requester need to provide both the requester‘s part number and the supplier‘s part number?

### This may vary, depending on the circumstances. Generally, it will advantageous to provide both part numbers, if known, but at a minimum the part number listed on the requester's purchase order should be provided.

# Product Group

## Is the Product Group ID field mandatory?

### Use of the Product-Group tab is optional, but when the tab is used the Product Group ID data element becomes (conditionally) mandatory. In those cases, the ID is used to map the products of the Product Group to the product statement and/or other product related data in the AD-SRT.

## Where do you place Manufacturer Part Number (MPN) in the Product Group tab?

### Enter the Manufacture Part Number in the field titled "Supplier Product Number".

# Product STATEMENT

## What are the definitions of Conflict Minerals, Biocides, and Radioactive Materials, as used in the AD-SRT?

### Definitions (with references) for Conflict Minerals, Biocides, and Radioactive Materials are contained in the Instruction tab, under the Product-Statement section.

# Substance-In-Product declarations

## Is there a place to report a Bill of Material (BOM) level?

### Yes, BOM levels can be reported on the Substance-in-Product tab, by expanding the “BOM level“ columns (i.e., selecting the “+“ above column A).

## Where is multilevel BOM entered in a Substance-in-Product declaration?

### A multilevel BOM can be entered in the Substance-in-Product tab (for those declarations using a BOM structure), under the Product Group ID or Product Number, as appropriate.

## How are the "Number (#) of Instances" determined?

### This "Number of Instances" represents the “quantity“ of a subproduct (BOM level 1+n)) in the parent part of a product (BOM level 1) . This data field is only used only when a BOM is provided, and can precisely locate what subproduct contain specific substances.

## Does a declarable substance get reported at the product level (BOM = 1) or at the subproduct level (BOM level 1+n))?

### The declarable substance gets reported at the product or subproduct level where the declarable substance is actually present.

## Is the Chemical Abstacts Service (CAS) number, chemical name, European Community (EC) number, and IAEG ID required for each part?

### No, only one of the four allowed identifiers are required in the following priority: CAS, EC, IAEG ID, chemical name. See the AD-SRT "Instructions" tab (reference/go to the applicable section) for additional data related to substance identifiers.

## Does the name of the product have to be repeated on each line in the case where there are two or more AD-DSL substances to report?

### Repeating the name of the product is not necessary if the multiple AD-DSL substances are contained in the same product.

## Our manufacturing process is defined as "Build to Print" in which we use components according to the customer's exact specifications. Can we still be required to supply data about materials/substances present in those products in our AD-SRT?

### Yes, if the substances are listed on the Aerospace and Defence-Declarable Substances List (AD-DSL), then you must provide that data in your declaration. In that case, the customer is the de-facto “supplier“ of that data. In some cases however, the requester may not require the data for a declaration that the requester already possesses.

## How do I get help on substance mass estimations?

### Contact the requester for guidance on estimating the mass of declarable substances, where needed. Unless otherwise indicated by agreed-to supplier-requester contractual requirements, “Unknown“ might be an acceptable response where masses are not known.

## Can a supplier declare on a subset of AD-DSL substances, e.g.: only those substances with the regulatory criteria “Restricted in Articles (R1)“. If so, where in the AD-SRT can suppliers say they have completed a declaration only for a specific subset of AD-DSL substances??

### Suppliers should be declaring against the entire AD-DSL, unless otherwise agreed with their requester. In cases where only a portion of the AD-DSL substances will be used in a declaration, additional data should be provided to indicate a partial list (i.e., using only a portion of the AD-DSL) declaration. On the Supplier Authorization tab select Statement Type "Custom" and provide specific declaration/authorization text in the "Authorization Statement" field to capture the declaration specifics; for example, “AD-DSL, only substances restricted in Articles (R1) declared“. In a “distribute“ mode declaration, the entire AD-DSL should be used; a partial list declaration may not satisfy all customers that may use the declaration.

## Cost may be challenging when lab testing is needed to confirm data for product substance content. How can companies justify this added cost?

### This decision will vary, depending on the circumstances. The product supplier may decide to analyze the composition of their product (or a portion of their product) to increase the accuracy of their declaration data, or may be required to provide analytical data as agreed-to supplier-requester contractual requirements.

## How do I declare substances in items purchased from my suppliers, without any data?

### Request that suppliers complete a declaration for those items, by using the AD-SRT or some other means, to provide the necessary data in order to meet your declaration obligations.

## Can I use a Safety Data Sheet (SDS) to complete a substance declaration for my products?

### Not completely. An SDS may provide valuable data about the substances that could be contained in a supplied article product, but the data in an SDS is generally not sufficient by itself to determine the chemical composition of an article product. Data for product substance composition can usually only be obtained from appropriate declarations (e.g., by using a declaration that is consistent with IPC-1754 data requirements, such as by using the AD-SRT) recieved from suppliers, as well as derived data from internal product development processes. Many chemical formulations used for product development will undergo changes in composition due to chemical reactions (e.g., polymerization) and/or physical processes (e.g., evaporation) when they cure to a final form in an article product.

## If my product contains paint or sealant, can I use the paint or sealant substance percentages in the SDS to estimate the substance composition of my product?

### No, using SDS composition data is not accurate for the cured paint or sealant substance compositions, as their ingredients are commonly subject to reactions, evaporation, etc. that commonly affects their composition in article products data.

## How can additional data be provided for "Material Use" and "Substance Use" when the data is not available?

### Where those data elements are used, answering "Other" is an option when none of the available Material Use and Substance Use Descriptions is appropriate. Explanation of “Other“ should be subsequently entered in the comment fields (in Column AK, which is accessed by expanding Column AL).

## Does the AD-SRT allow different regulatory substance thresholds for substance reporting, (e.g., the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) >0.1% w/w threshold concentration for “Communication“ (Article 33) reporting, versus Restriction of Hazardous Substances (RoHS) >0.1% w/w compliance threshold [for in-scope products] in homogenous materials)?

### No, the AD-SRT does not use substance thresholds. However, thresholds may be imposed by agreed-to supplier-requester contractual requirements.

## Do we need to declare substances which are trade secrets?

### Yes, if they are listed on the AD-DSL. This requirement to provide such data may be modified by agreed-to supplier-requester contractual requirements, and might be covered by applicable Non-Discolsure Agreements (NDA).

## Are all the substances on the AD-DSL required to be declared?

### If AD-DSL substances exist in the product then it is mandatory to declare each substance(s), unless the requirement is modified (e.g., by agreed-to supplier-requester contractual requirements).

## Are substances in base alloys required to be declared in the AD-SRT?

### If the substances in the base alloy are included in the AD-DSL then they must be declared, unless additional agreements modify the requirement. Declarations covering a Full Substances Declaration (FSD, sometime called a Full Material Declaration, or FMD) require all substances in the product be declared, including those contained in base alloys.

## What does it mean if I cannot find a CAS number in the substance list for a substance I intend to declare? Can I manually add additional CAS numbers?

### If a CAS number is not listed, then the substance is not listed in the AD-DSL used in the declaration. When submitting data on additional substances not on the AD-DSL (e.g., when submitting an FSD), additional CAS numbers and associated data can be manually added in the AD-SRT. However, entering this data in one field will not automatically populate any additional fields, such as is the case for listing substances that are on the AD-DSL.

# substance-in-process

## Are substance-in-process declarations mandatory?

Substance-in-process declarations (“process declarations”) are not mandatory in IPC-1754 declaration, but may be required by agreed-to contractual requirements.

# attachments

## Can you attach files (e.g., supporting documetation) to an AD-SRT?

### Yes, the AD-SRT tool is capable of attaching multiple files in Tab 6, (“Attachments“), including text and ZIP compressed files.

# Supplier-Acceptance

## What is the intention of the Acceptance Statement in the Supplier-Acceptance tab?

### The intention is to have a explicit record confirming that the data provided is officially provided by the supplier, and that the declaration data is complete.

1. This document includes two spellings of “defence” or “defense”, used as they occur in the titles of referenced documents. [↑](#endnote-ref-2)