IAEG INTERNAL - WG1 Frequently Asked Questions (FAQ)

20 February 2026

Version 01

Purpose: This document is released for purpose of addressing questions frequently asked pertaining to the materials and substances declaration process and Working Group 1 resources used during the declaration process.

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Version History

Date	v#	Modified By	Section, Page(s) and Text Revised
20 February 2026	1.0	Working Group 1	Development of an internal FAQ containing comprehensive information on operational products.

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Executive Summary

Working Group 1 (WG1) of the International Aerospace Environmental Group (IAEG) develops and maintains technical guidance and process documentation related to substance declarations across the aerospace and defense (AD) value chain. WG1 includes subject-matter experts from Original Equipment Manufacturers (OEMs), suppliers, and other industry stakeholders who collaborate to produce implementable solutions, best practices, and standardized artifacts that support compliance, safety, and interoperability.

This internal Frequently Asked Questions (FAQ) provides detailed information on WG1's processes, deliverables, and active products. This FAQ is intended for IAEG members only. It complements the externally facing FAQ, which is tailored for non-member audiences and contains high-level, public information.

Primary Objectives of WG1

1. **Standardization:** Define and promote consensus-based standards that improve safety, efficiency, and interoperability across AD systems and supply chains.
2. **Knowledge Capture and Sharing**: Document WG1 processes, decisions, and technical rationale to preserve institutional knowledge and enable consistent application across member organizations.
3. **Collaboration and Implementation**: Facilitate cross-sector collaboration to resolve complex engineering and regulatory challenges and to produce practical, actionable guidance for implementation.

Deliverables and Usage:

1. Actionable recommendations, guidance documents, templates, and tools for substance declaration and related processes.
2. Regularly updated process descriptions, product status, and change logs to support transparency and traceability among members.
3. Workshops, working sessions, and review cycles to validate content and support member adoption.

Access and Maintenance:

- This internal FAQ is restricted to IAEG members and is maintained by WG1 contributors. WG1 will review and update on a scheduled basis to reflect new decisions, published standards, and product changes.
- For public-facing topics, refer to the external FAQ available on the IAEG website: https://www.iaeg.com/binaries/content/assets/iaeg/wg1/wg1_faq_v3.0.pdf

1 Introduction

Welcome to the International Aerospace Environmental Group (IAEG) internal Frequently Asked Questions (FAQ). This document provides formal, authoritative guidance and concise answers to recurring inquiries regarding Working Group 1 (WG1) processes, work products, substance lists, and related documentation. Access to this FAQ is restricted to IAEG members; the content is intended solely for internal use and reflects WG1's procedures, guidance, and decisions.

1.1 Scope

This FAQ addresses WG1 processes, deliverables, product status, and routinely encountered technical and procedural questions. It is not a substitute for formal standards, contractual obligations, or regulatory documentation.

1.2 Navigation

To navigate this document, use the document outline/bookmarks panel in your PDF reader and select the desired section.

1.3 Maintenance and Feedback

This FAQ is maintained by WG1 and reviewed on a scheduled basis. To propose additions or corrections, send an email to WG1@iaeg.com and provide relevant supporting details.

1.4 Confidentiality

This document and its contents are for internal IAEG use only. External distribution or disclosure is prohibited without prior authorization from WG1 leadership.

1.5 Further Assistance

If you require further assistance, contact the WG1 support team at WG1@iaeg.com.

1.6 Important Notice

Do not attach completed declarations (for example, AD-SRT files) or proprietary information when contacting IAEG by email. Any supporting files submitted must be directly relevant to WG1 deliverables and comply with applicable WG1 submission procedures.

2 Aerospace and Defense Declarable Substances List

2.1 Introduction

The Aerospace and Defense Declarable Substances List (AD-DSL) is a list of substances subject to supplier substance reporting in the AD supply chain. IAEG has identified regulated chemical substances of concern to the international AD industry that are subject to current use, product content restrictions or reporting requirements impacts on the industry or its customers. The AD-DSL is used for supplier reporting of chemical substances that are included in its products, used in the production of those products, or required for product maintenance or repair.

The AD-DSL was developed through collaboration among IAEG member companies and is actively managed to ensure currency and accuracy, continuing to meet the needs of the AD industry.

2.2 General Questions about the AD-DSL

2.2.1 What is the AD-DSL?

The AD-DSL is a list of substances that are known or are suspected to be used in AD industry products and processes and that may impose compliance and/or materials obsolescence-related risk on the industry.

2.2.2 Where Can I Find the AD-DSL?

The current version is available on the IAEG website: https://www.iaeg.com/chemicalrpt/addsl/

2.2.3 What is the Purpose of the AD-DSL?

The AD-DSL is developed by IAEG for use by the members of the AD industry and its supply chain to collect product-related substance information from suppliers.

2.2.4 How is the AD-DSL Developed and Released?

The AD-DSL is produced through a staged, revision-controlled process. Global regulations of interest to AD are captured in an internal work product called DEL-001 and used to build the Regulated Substances List (RSL) and Regulatory Criteria List (RCL). These internal work products (DEL-001, RSL, RCL, and the iAD-DSL) are described in later sections. The latest version of these IAEG-internal work products can be found on the SAE Standard Works website (final) and WG1's SharePoint (working). Contact WG1@iaeg.com if you need access to these sites.

During the member screening process, the RSL is reviewed by IAEG member companies to identify industry dependencies; those member responses are consolidated to create the internal AD-DSL. After Sub Team 1 (ST1; who reviews Global chemical regulations affecting the AD industry) and WG1 reviews and approves changes to the AD-DSL, the finalized external AD-DSL is released and published.

2.2.5 How Often is the AD-DSL Updated?

The AD-DSL is updated on an annual cycle following the established process described in the question above (How is the AD-DSL Developed and Released?). Occasionally, if an urgent correction or improvement is identified mid-cycle, WG1 will publish a minor update. All changes and the reasons for them are documented in the corresponding release notes for each update.

2.2.6 Why is a Certain Substance on the AD-DSL?

A substance appears on the AD-DSL because it first meets the regulatory-based criteria to be included on the RSL (i.e., it is a regulated substance or a precursor/subject of regulatory interest to AD). It is then carried into the AD-DSL only if at least one IAEG member company confirms a product-related dependency (use in products, in their manufacture, operation, or maintenance).

Please note that the external AD-DSL does not list the underlying regulations themselves; instead, each AD-DSL entry shows the applicable regulatory criteria (R1, R2, D1, or I). To identify the specific regulatory drivers, consult the RSL or RCL. Member screening details (the number of companies that reported dependencies) are recorded in the internal AD-DSL.

2.2.7 Which WG1 Tool Should I Use to Find Additional Regulatory Information Not Included on the AD-DSL?

The AD-DSL is regulation-agnostic — it presents a consolidated, global view of substances of concern without reproducing jurisdiction-specific regulatory texts. For regulation-level detail, consult the RSL or RCL. The RSL gives a substance-centric view useful for member screening and identifying family groupings and aggregated regulatory criteria. The RCL provides the regulation-level detail — each substance–regulation pairing is listed separately so you can trace specific regulatory drivers, jurisdictions, clause notes, aerospace exemptions, and the exact criterion assigned. For more information about the purpose of these files, see the Internal Work Products related to the AD-DSL Development Process section of this FAQ.

2.2.8 What Should I Do if I Spot an Error on the AD-DSL?

Please email the ST1 Lead, WG1 Lead, or WG1@iaeg.com to report an error in the AD-DSL.

2.3 Components of the AD-DSL

2.3.1 What is an IAEG ID?

The IAEG ID is a unique identifier assigned by IAEG's consultant to all substances on the RSL/RCL**.** It is used to track substances and their relationships to associated regulations and is useful for substances that do not have a CAS**.**

2.3.2 What are Regulatory Criteria (R1, R2, D1, and I) and How Are They Determined?

Regulatory criteria (R1, R2, D1, and I) are high-level labels that summarize the type of regulatory driver associated with a substance without listing specific laws or jurisdictions. After reviewing the underlying regulation(s), IAEG's consultant assigns one or more criteria to each substance.

Definitions:

- **Restricted in articles (R1):** At least one regulation, in one or more regions, restricts (totally or partially) the presence of the substance in AD articles and/or requires an authorization/permit in order to continue to use the substance in articles.
- **Restricted in substances and mixtures (R2):** At least one regulation, in one or more regions, restricts (totally or partially) the use of the substance (either alone or in mixtures) and/or requires an authorization/permit in order to continue to use the substance.
- **Declarable in articles (D1):** At least one regulation, in one or more regions, requires the disclosure of the substance when present in AD articles.

- **Of Interest (I):** The substance is not currently identified as meeting R1, R2, or D1; however, it may be otherwise regulated in one or more regions. The substance is of interest due to uses in AD applications and may be a candidate for future regulatory activity in at least one region.

The criteria summarize regulatory effects rather than the detailed legal text or jurisdictional scope; to see specific regulatory drivers consult supporting IAEG-internal work products (RSL, RCL, and DEL-001). Regulatory criteria assignments can change as laws and lists evolve and the presence or absence of any IAEG regulatory criterion is informational only and does not by itself indicate whether a substance may or may not be used in AD products or processes.

2.3.3 How Can There be Multiple Regulatory Criteria Assigned to a Single Substance?

Each substance on the AD-DSL may be subject to multiple regulatory drivers, and the AD-DSL aggregates the regulatory information for those drivers into a consolidated set of criteria. That means a single substance entry can reflect different effects from different regulations — for example, it may be marked “Of Interest” because of one regulatory entry while also showing restriction or mandatory disclosure criteria from other entries. In addition, an individual regulation can impose more than one obligation (for example, restricting presence in articles [R1], restricting use in substances/mixtures [R2], and requiring disclosure [D1]); all applicable effects from each regulation are included in the aggregated criteria shown for the substance.

2.3.4 What Does "Date First Added" and "Revision Date" Mean?

These fields support AD-DSL document control and versioning:

- **Date First Added:** the date the substance first appeared on the external AD-DSL.
- **Revision Date:** the date of the most recent change to that AD-DSL entry (for example, a change in regulatory criteria, status changes such as moving on/off the deletions tab, or other substantive edits).

Note: these dates apply specifically to the external AD-DSL as a published work product. Dates recorded in internal work products (for example the RSL or RCL) may differ because those internal lists follow their own revision-control records and development timeline.

2.3.5 What is the Purpose of the Entry Type section?

The entry type terminology is derived from the Substances of Concern In Products (SCIP) database (EU’s Waste Framework Directive) and was added to the AD-DSL for compliance with the IPC-1754 reporting standard. Entries that are considered grouping headers and cover several substances are called “Group Direct Entry.” Furthermore, a substance that falls under this category or grouping is identified as a “Group Member.” Group Members may be explicitly mentioned in associated regulations, or they are identified by IAEG if they fit the definition of the grouping. “Substance Direct Entry” are individual substances that do not fit within any grouping.

2.3.6 Why are Certain Substances Shaded?

Shaded entries indicate substances that are part of a group on the AD-DSL. Darker shading denotes a Group Direct Entry (the parent group itself), while lighter shading denotes a Group Member (an individual substance listed under that parent). Group Members reference their parent via the “Parent Group IAEG ID” column. WG1 has historically imported groupings from the most current SCIP

Candidate List Package. We plan to expand coverage to include additional regulatory groupings found in other authoritative sources, which will be identified by ST1 members. New groups will be added using the same shading convention and retain the AD-DSL's neutral, source-agnostic presentation.

2.3.7 What is the Purpose of the Deletion Tab on the AD-DSL?

The deletions tab lists substances that have been removed from the AD-DSL and the reason for removal. Substances are removed for one of three reasons:

1. **Change in regulatory status:** for example, a substance is covered by an AD-specific exemption, is no longer listed by the underlying regulation, or ST1 has decided to drop a regulation or specific sections of a regulation based on subject matter expert feedback.
2. **Administrative or data error:** for example, duplicate entries or other mistakes discovered during review.
3. **Lack of industry dependency:** the substance has not been declared by any member during the member screening process for five consecutive years.

Each deletion is recorded in the deletions tab with the date and justification; deleted substances are no longer shown on the external AD-DSL but remain documented in the deletions tab for traceability.

3 Internal Work Products Related to the AD-DSL Development Process

3.1 Introduction

The following internal work products (DEL-001, RCL, RSL, and the iAD-DSL) form the controlled workflow that underpins AD-DSL development. DEL-001 captures the authoritative list of global substance regulations, the RCL maps regulation-level substance details and criteria, and the RSL consolidates those mappings into a substance-centric list that members screen; member responses are then aggregated into the iAD-DSL which is filtered to produce the external AD-DSL. These internal files are maintained under revision control and together feed the external AD-DSL publication. These internal work products are proprietary to IAEG and are not for distribution outside of IAEG membership.

3.2 List of Global Substance Regulations that May Impact the AD Industry (DEL-001)

3.2.1 What is DEL-001?

DEL-001 is the version-controlled reference list of global substance regulations that may affect the AD industry and is the first step in the AD-DSL development process. It documents regulations that impose product-related restrictions, affect the presence of substances in articles or mixtures, require mandatory disclosure, or could pre-empt other listings. Each entry records jurisdiction, official references, links to source texts, and regulatory criteria information. Once updates are approved by ST1, WG1's consultant uses DEL-001 to generate the RSL and RCL.

3.2.2 How is DEL-001 Developed?

DEL-001 is produced and maintained as a revision-controlled inventory of international, national, and regional regulations that could affect the AD industry. WG1's consultant collects candidate regulatory entries from authoritative sources and applies scope filters so only regulations relevant to product-related restrictions, presence in articles/mixtures, mandatory disclosure requirements, or potential preemptive listings are included (regulations that apply only to consumer or professional products are excluded). Priority jurisdictions are monitored as a baseline and WG1's consultants or members may propose additional jurisdictions or regulations for WG1's consideration.

3.2.3 How Should I Request an Addition to DEL-001?

If your suggested regulatory addition falls within the scheduled DEL-001 update period (typically December to January), raise the item during the regularly scheduled ST1 meetings. If outside that window, bring the item to an ST1 meeting or submit it by email to the ST1 Lead and WG1 Lead or to WG1@iaeg.com. Your request should include any pertinent regulatory background and a clear justification for inclusion. ST1 will review the proposal and, if appropriate, approve it for inclusion in next DEL-001 release.

3.3 Regulated Substances List (RSL) and Regulatory Criteria List (RCL)

3.3.1 How are Substances Selected for Inclusion on the RSL/RCL?

Substances are selected for inclusion on the RSL and RCL through a structured process governed by WG1 and administered by WG1's consultant. This process begins with the development and maintenance of a comprehensive List of Global Substance Regulations that May Impact the AD industry (DEL-001). DEL-001 focuses on regulations that restrict or require disclosure of substances, focusing on key regions such as the United States, Canada, the European Union, and others.

Substances associated with these regulations are pulled together to form the RSL and RCL and are included based on their relevance to aerospace applications, ensuring that only those with significant regulatory implications are included.

3.3.2 What is the Difference Between the RSL and RCL?

The RSL and the RCL contain the same underlying set of chemicals and substance families that meet IAEG's regulatory selection criteria, but they are organized differently to support different tasks. The RSL is a substance-centric, consolidated view: each substance (IAEG ID) appears on a single row and the columns summarize that substance's aggregated listing status and criteria across relevant regulations. Because it highlights family groupings, aggregated regulatory criteria, and a consolidated change history, the RSL is the basis for the response form distributed to member companies during the member screening process.

By contrast, the RCL is a regulation-centric, granular view in which every substance–regulation pairing occupies its own row. The RCL maps specific regulatory drivers, jurisdictions, clause level notes, and the criterion assigned for that particular regulation–substance pair, making it the preferred tool for tracing the exact regulatory sources and justifying criterion assignments.

In short, use the RCL when you need to see which regulation(s) drive a substance and examine the regulatory detail; use the RSL when you would prefer an aggregated view, or more detailed information for chemical family groupings. Both lists are derived from DEL-001, are revision controlled, and include change logs to maintain traceability.

3.3.3 What is the Difference Between Primary and Secondary Substances?

Primary substances have their Chemical Abstract Service Registry Number (CASRN) listed directly in a regulation and/or regulatory list while secondary substances are included in the RSL because they meet the criteria of a regulatory entry (though not directly cited).

3.3.4 Why are Certain Chemical Family Groupings listed on the RSL?

When a regulation lists a chemical group (for example, "Cadmium and its compounds") rather than individual CASRN, IAEG records both the regulatory group entry and the specific substances that, based on the regulation's description (structure, properties, or scope) and subject matter expert review, reasonably fall within that group. Members of these families are flagged in the RSL so users can connect substances to regulatory groups. The discrete member list is intended to capture the most relevant CAS entries for AD applications (while it is non-exhaustive) and make it easier for member companies to screen for dependencies and assess regulatory risk. ST1 reviews chemical family groups annually; member companies should contact ST1's lead if there is interest in adding new groups.

3.4 Member Screening

3.4.1 How Long Does Member Screening Normally Last?

Member screening is the process where IAEG member companies review the RSL and declare whether each listed substance is used in their products, manufacturing, operation, or maintenance. The screening activity is performed on a scheduled cycle (the declaration form is distributed to members approximately once every 12 months) and members are provided a defined submission window. Exact submission periods and deadlines are communicated with the member screening guidance, but response is usually requested within four weeks.

3.4.2 Who Should I Return My Declaration Form To?

Completed declaration forms and any requested supporting information are returned to the designated WG1 consultant point of contact. WG1's consultant is responsible for anonymizing and aggregating individual member responses before sharing consolidated results with WG1.

3.4.3 What Happens with my Company's Response?

Member responses are treated as confidential. WG1's consultant anonymizes individual submissions and performs quality checks (one declaration per member, validation by the designated Point of Contact, and follow-ups for any questionable or sole claim dependencies). Aggregated results (counts of how many members declared a substance) are incorporated into the iAD-DSL. WG1's consultant will not disclose individual member identities if five or fewer members submitted; if six or more members submit and WG1 requests it, the consultant can supply a list of submitting company names but will never share individual member responses. Responses may also trigger follow-up queries (for example, if a single member is the only claimant for a substance) to ensure data quality.

3.5 Internal AD-DSL

3.5.1 How is the Internal AD-DSL Developed?

The Internal AD-DSL (iAD-DSL) is produced by the WG1 consultant after member screening is complete. The iAD-DSL includes all original RSL details, expands any regulatory family (group) entries to list their individual members, and adds an additional column showing how many member companies declared use of each substance. ST1 reviews the iAD-DSL and may request manual additions, removals, or further analysis from the WG1 consultant before the approved file is saved to SAE.

3.5.2 How is the iAD-DSL Different from the External Version?

The iAD-DSL is an internal, richer dataset used to develop the external AD-DSL. It contains the full RSL data plus current and historical member screening results (member count information for each substance), family member expansions, and internal change log history. The external AD-DSL is a pared down, published version derived from the iAD-DSL: it generally removes substances not declared during the screening process, omits regulation-level details, and member screening data so it is suitable for external distribution.

3.5.3 How is the iAD-DSL Helpful to Member Companies?

The iAD-DSL helps members and WG1 stakeholders understand industry-wide dependencies and regulatory risk by showing the underlying RSL details together with how many companies reported use of each substance. The expanded family member listings make it easier for companies to identify CAS numbers relevant to their products. Information found in the iAD-DSL is regularly used by other WGs (2, 5, and 9) to support the development of their work products.

4 PFAS Lists

4.1 Introduction

The IAEG-PL was specifically created to address a sector's need: identifying the use of PFAS in the supply chain and production processes, including those that are not currently regulated. One of the main challenges with PFAS is detecting them in materials and finished products. To address this challenge, the idea was to compile a set of PFAS molecules that are active in commerce so that IAEG member companies could identify the uses they depend on and take appropriate measures in case of regulatory obligations or other market impacts. The result is two deliverables: the IAEG-PL and the IAEG Trade Name list.

4.2 IAEG PFAS List (IAEG-PL)

4.2.1 How was the IAEG-PL Created?

The IAEG-PL was assembled by identifying and compiling organic fluorinated substances appearing in various global chemical inventories of interest to the AD industry and its supply chain. Each candidate substance was subsequently evaluated against the Organisation for Economic Co-operation and Development (OECD) PFAS definition1 of organic fluorine substances that contain at least one fully fluorinated methyl (– CF3) or methylene (–CF2–) carbon atom (without any other non-fluoride halogen atoms attached to it), eliminating those that do not meet the OECD definition. The resulting list therefore reflects PFAS of potential relevance to the AD industry rather than reproducing jurisdiction-specific regulatory requirements. This process was repeated anew with the publishing of Version 2 of the IAEG-PL.

4.2.2 Why is the IAEG-PL Separate from the AD-DSL?

Since PFAS regulations are still evolving, many of the chemicals that belong to this substance group are not currently regulated or restricted. As a result, these unregulated substances would not be included in the RSL and consequently would be absent from the AD-DSL by process. Therefore, these unregulated PFAS are included in the IAEG-PL, as well as those that are regulated and thus listed on the AD-DSL.

4.2.3 How Can I Use the IAEG-PL?

The IAEG-PL can be used in several practical ways to support PFAS awareness and management across your supply chain and products:

- Querying supply chains to obtain supplier disclosures for PFAS in supplied products and those PFAS required to produce those products.
- Checking which PFAS may be present in your products, processes, or product maintenance or repair activities and using such data to guide material selection decisions
- Consulting IAEG member screening data (internal work product) to understand AD industry PFAS use.
- Screening candidate replacement materials to avoid reintroducing PFAS.

Note: the IAEG-PL focuses on substance identification and market presence, not regulatory obligations — consult iAD-DSL work products for regulation-level detail.

[1] Organisation for Economic Co-operation and Development (OECD). https://www.oecd.org/en/topics/sub-issues/risk-management-risk-reduction-and-sustainable-chemistry/per-and-poly-fluorinated-chemicals.html. Accessed 1 December 2025.

4.2.4 Why do Some IAEG IDs Have the Letter "P" at the end?

IAEG IDs are unique identifiers assigned by IAEG to all substances in WG1's work products. These IDs help track substances, particularly those that lack identifiers like CAS or EC numbers.

The "P" suffix in certain IAEG IDs indicates that the substance is a PFAS that is included as active in at least one national inventory but is not yet regulated under an international convention or a global regulation of interest to AD. It is important to note that not all PFAS substances will have a "P" at the end of their IAEG IDs. Once a substance with a "P" suffix becomes regulated, the suffix will be removed, signifying that it is now associated with a regulatory driver

4.3 IAEG Trade Name List

4.3.1 How was the IAEG Trade Name List Created?

The IAEG PFAS Trade Name List was developed to help member companies prepare for potential PFAS restrictions by providing fluoropolymer trade name and manufacturer information alongside known typical uses of those materials. These were compiled from IAEG member companies' information reviewed to ensure completeness and accuracy. WG1 members may submit updates as new information is identified, ensuring the list remains accurate and as current as possible.

4.3.2 How Can This List Be Used?

The list can be used to track fluoropolymer usage more effectively. Since commercial product names are often more recognizable in supply chain documentation than chemical identifiers (e.g. CASRN, EC Number), this list helps companies identify fluoropolymer presence based on trade names. It is hosted on SharePoint and continuously updated through member contributions.

5 Aerospace and Defense Substance Reporting Tool

5.1 Introduction

The Aerospace and Defense Substance Reporting Tool (AD-SRT) is a data reporting tool that is currently compatible with IPC-1754 (Materials and Substances Declaration for Aerospace and Defense and Other Industries) and is intended for companies in the aerospace and defense supply chain to use for materials and substances declarations. Further, the AD-SRT is designed to be used with the AD-DSL in providing substance declarations. The AD-SRT, AD-DSL and other supporting tools and data developed by IAEG are provided for voluntary use.

5.2 General Questions about the AD-SRT

5.2.1 Where Can I Find Additional Data on the AD-SRT?

IAEG has developed the AD-SRT to support materials and substances declarations for the AD industry and its global supply chain. The AD-SRT supports the use of the data exchange standard IPC-1754 Materials and Substances Declaration for the Aerospace and Defense, and Other Industries. The AD-SRT is intended to be used with the AD-DSL and available on the IAEG website: https://www.iaeg.com/chemicalrpt/adsrt.

5.2.2 Does the AD-SRT Reflect Substance Regulatory Derogations/Exemptions Applicable to AD Product Applications or Uses?

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

5.2.3 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 Website:http://www.iaeg.com/chemicalrpt/

5.3 Using the AD-SRT

5.3.1 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 developing and implementing a declaration process with realistic expectations and schedules. The AD-SRT training modules are available at this link on the IAEG website: https://www.iaeg.com/chemicalrpt/adsrt/training-lessons.

5.3.2 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 address 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. In addition, you could use the "IAEG Materials & Substances Declaration Development Document" as reference support to process your declaration request.

5.3.3 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 multiple single product declarations and product group declarations.

5.3.4 Why are Some AD-SRT Data Fields Mandatory versus Optional and Which AD-SRT Data Fields are Considered "Mandatory"?

According to the data exchange 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).

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.

5.3.5 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.

5.3.6 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 if all mandatory data elements are completed.

5.3.7 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, that may be applicable to the declaration. Please remember to review your contractual requirement and consult the requester if you have questions.

5.4 Requester-Supplier Data

5.4.1 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). 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.

5.4.2 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.

5.4.3 Is the Document Identification (ID) Provided by the Requester, 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.

5.4.4 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 (e.g., DUNS, CAGE). 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).

5.4.5 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 be 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.

5.5 Product Group

5.5.1 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.

5.5.2 Where Do You Place MPN in the Product Group tab?

Enter the Manufacturer Part Number (MPN) in the field titled "Supplier Product Number".

5.6 Product Statement

5.6.1 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.

5.7 Substance-in-Product Declarations

5.7.1 Is There a Place to Report a Bill of Material Level?

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

5.7.2 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.

5.7.3 How is 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 used only when a BOM is provided and can precisely locate what subproduct contains specific substances.

5.7.4 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 present.

5.7.5 Is the Chemical Abstracts 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.

5.7.6 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.

5.7.7 Our Manufacturing Process is Defined as "Build to Print" in Which We Use Components According to the Customer's Exact Specifications, Are We Still Required to Supply Data about Materials/Substances Present in Those Products on our AD-SRT?

Yes, if the substances are listed on the AD-DSL, then you must provide that data in your declaration. In that case, the customer is the de-facto “supplier” of that data. The declaration may be exempt if the information already exists internally, as confirmed by the requester.

5.7.8 How Do I Get Help on Substance Mass Calculations?

Contact the requester for guidance on calculating 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. In addition, you could use the “IAEG Materials & Substances Declaration Development Document” as a reference to calculate substance masses in the article (part).

5.7.9 Can a Supplier Declare on a Subset of AD-DSL Substances? See Example Below

Example: 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 Acceptance* tab # 7 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.

5.7.10 Cost may be Challenging when Lab Testing is Needed to Confirm Data for Product Substance Content. How Can Companies Justify this Added Cost?

Lab testing is not required to confirm product substance content data. 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.

5.7.11 How do I Declare Substances in Items Purchased From Suppliers When No Data Is Available?

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.

5.7.12 Can I Use a SDS to complete a Substance Declaration for my Products?

You cannot use a Safety Data Sheet (SDS) alone to complete a substance declaration. An SDS may provide valuable data about the substances that could be contained in a supplied article product, but the data in an SDS may not be 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 received 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.

5.7.13 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 always accurate for the cured paint or sealant substance compositions, as their ingredients are often subject to items such as reactions or evaporation that may affect their composition in the final product. For further information, please refer to the “IAEG Materials & Substances Declaration Development Document” available on the IAEG website: https://www.iaeg.com/binaries/content/assets/iaeg/iaeg-materials--substances-declaration-development_v2.2_final_6-28-22.pdf

5.7.14 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).

5.7.15 Does the AD-SRT Allow Different Regulatory Substance Thresholds for Substance Reporting? See Example Below.

Example: 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. In addition, please review your business-to-business (B2B) contractual agreement and consult with your requester.

5.7.16 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-Disclosure Agreements (NDA).

5.7.17 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).

5.7.18 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, (FMD) require all substances in the product be declared, including those contained in base alloys.

5.7.19 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.

5.8 Substance-in-Process Declarations

5.8.1 Are Substance-in-Process Declarations Mandatory?

Substance-in-process declarations ("process declarations") are not mandatory unless required by agreed-to contractual requirements.

5.9 Attachments

5.9.1 Can you Attach Files (e.g., Supporting Documentation) 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.

5.10 Supplier-Acceptance

5.10.1 What is the Purpose of the Supplier-Acceptance Tab Acceptance Statement?

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

5.11 Supporting Lists

Materials and Substances Declaration Supporting lists include the AD industry Query List (AD-QL) and lists for optional material and substance function data in AD industry declarations – a Material Function Use Descriptor List (AD-MFUDL) and a Substance Function Use Descriptor List (AD-SFUDL).

These lists are available on the IAEG website: https://www.iaeg.com/chemicalrpt/lst

APPENDIX A

List of Acronyms

Abbreviation	Definition
AD	Aerospace and Defense
AD-DSL	Aerospace and Defense Declarable Substances List
AD-MFUDL	Aerospace and Defense industry Material Function Use Descriptor List
AD-QL	AD industry Query List
AD-SFUDL	Aerospace and Defense industry Substance Function Use Descriptor List
AD-SRT	Aerospace and Defense Substance Reporting Tool
B2B	Business to business (B2B) *agreements*
BOM	Bill of Material
CAGE	Commercial and Government Entity
CAS No.	Chemical Abstracts Service Number - A unique numeric identifier for a chemical substance.
CASRN	CAS Registry Number (see CAS No.)
D1	Declarable in articles - At least one regulation, in one or more regions, requires the disclosure of the substance when present in AD articles.
DEL-001	The DEL-001 is the version-controlled reference list of global substance regulations that may affect the AD industry and is the first step in the AD-DSL development process
DSL	Declarable Substances List
DUNS	Data Universal Numbering System
EC No.	European Community Number - A unique seven-digit identifier assigned to a chemical substance within the European Union, used to identify it for regulatory purposes within the REACH system.
ECHA	European Chemicals Agency
FAQ	Frequently Asked Questions
FMD	Full Material Declaration
FSD	Full Substances Declaration
HMTL	Hazardous Materials Target List
I	The substance is not currently identified as meeting any criteria for R1, R2 or D1; however, it may be otherwise regulated in one or more regions. The substance is of interest due to uses in AD applications and may have been identified as a candidate for future regulatory activity in at least one region.
iAD-DSL	The internal AD-DSL (iAD-DSL) is an internal, expanded dataset that combines full RSL details with family-member expansions and current/historical member screening results (including company-use counts) to support development of the external AD-DSL and inform industry regulatory risk.
IAEG	International Aerospace Environmental Group
IAEG-FPL	An internally maintained list of fluoropolymer tradenames.
IAEG-ID	A unique identifier for each substance on WG1's work products. The identifier remains fixed to an individual substance once it is assigned, ensuring consistency and trackability.
IAEG-iPL	An internally maintained list of the IAEG-PL that contains member screening results.
IAEG-PL	IAEG Per- and Polyfluorinated Alkyl Substances List
IPC	formerly known as the Institute of Printed Circuits, now goes by IPC or IPC International
MPN	Manufacturer Part Number

Abbreviation	Definition
NDA	Non- Disclosure Agreement
OECD	Organisation for Economic Co-operation and Development
OEM	Original Equipment Manufacturer
PFAS	Per- and Polyfluorinated Alkyl Substances
R1	Restricted in articles - At least one regulation, in one or more regions, restricts (totally or partially) the presence of the substance in AD articles and/or requires an authorization/permit in order to continue to use the substance in articles
R2	Restricted in substances and mixtures - At least one regulation, in one or more regions, restricts (totally or partially) the use of the substance (either alone or in mixtures) and/or requires an authorization/permit in order to continue to use the substance.
RCL	Regulatory Criteria List
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
RoHS	Restriction of Hazardous Substances
RSL	Regulated Substance List
SCIP	Substances of Concern In Products
SDS	Safety Data Sheet
ST	Sub Team
WG1	Working Group 1

Note:

This list is for acronyms only; does not include measurements or chemical formulas.