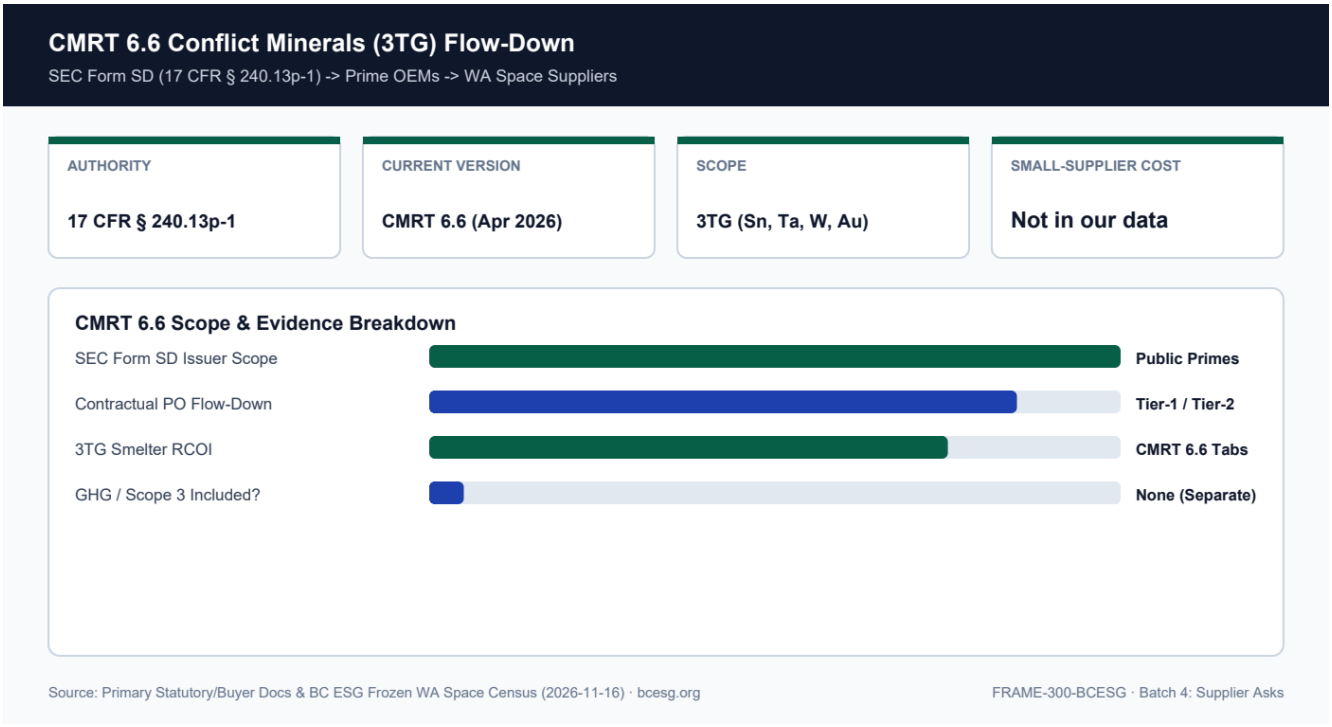
CMRT 6.6 Conflict Minerals (3TG) Requests for WA Space Suppliers

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Verification & Authority Baseline: Issued by SEC-reporting aerospace primes and Tier-1 OEMs under SEC Rule 13p-1 (17 CFR § 240.13p-1). Statutorily binding on SEC issuers; contractually binding on private WA suppliers only when incorporated into purchase orders. Current RMI template is CMRT 6.6 (released April 17, 2026).



Dimension	Verified Requirement / Current State	Primary Source
Statutory Authority	SEC Rule 13p-1 (Dodd-Frank § 1502) — Form SD issuers only	17 CFR § 240.13p-1
Supplier Binding Status	Contractually binding when included in Prime PO / Terms	Prime Supplier Terms
Active Template	RMI CMRT 6.6 (released April 17, 2026)	Responsible Minerals Initiative
Materials Covered	Tin, Tantalum, Tungsten, Gold (3TG) only	RMI CMRT 6.6
GHG / Scope 3 Mandate	None; FAR Case 2021-015 withdrawn Jan 13, 2025 (90 FR 2663)	Federal Register
RMI Template Fee	$0 (free download); internal labor cost not in our data	RMI Portal

Who Issues This Ask, Authority, and Binding Status

CMRT requests are issued by publicly traded aerospace and defense primes—including The Boeing Company, Honeywell Aerospace, Aerojet Rocketdyne (L3Harris), Amazon Leo, BlackSky, and ARKA (CACI)—to fulfill their annual SEC Form SD filing under Dodd-Frank Section 1502 (`17 CFR § 240.13p-1`).

Statutorily, Rule 13p-1 binds only SEC-reporting issuers, not privately held Washington machine shops or electronics assemblers. However, once a prime embeds conflict-minerals flow-down clauses into its Master Terms or Purchase Order, **the ask becomes contractually binding** on the supplier. Note the dead-rule boundary: CMRT 6.6 covers **3TG minerals only** (tin, tantalum, tungsten, gold) and carries **zero** GHG or Scope 3 reporting mandate; the proposed FAR Climate Rule (`FAR Case 2021-015`) was withdrawn on January 13, 2025 (`90 FR 2663`).

Evidence Required & Small-Supplier Effort Cost

A supplier satisfies the request by downloading the official **CMRT 6.6** Excel workbook from RMI, completing the `Declaration` tab (answering Questions 1–7 on 3TG presence and Reasonable Country of Origin Inquiry), populating the `Smelter List` tab with verified RMI Smelter IDs from upstream mill/alloy certificates, and passing the built-in `Checker` tab with zero errors.

In effort terms, RMI does not charge a fee to download or submit CMRT 6.6. Exact small-supplier labor hours and software costs are **not in our data**; effort scales with BOM complexity—a single-alloy CNC shop (e.g., 6061 aluminum or 304 stainless with zero 3TG) typically completes a company-level negative declaration in one pass, whereas PCB assemblers using tin-lead/SAC solder and gold-plated connectors must roll up distributor CMRTs.

WA Space Cluster Segments & Companies Affected

CMRT 6.6 lands most heavily on WA electronics, RF, guidance, and avionics suppliers in Components & Suppliers and Satellite Manufacturing—specifically Xanfab (SeaTac SMT PCB assembly), Crane Aerospace & Electronics (Lynnwood RF/power), PacAero (hermetic seals/connectors), Kymeta (Redmond antennas), and Space Valves.

Verified Primary Sources & Internal Bridges

• eCFR — 17 CFR § 240.13p-1 (Conflict Minerals):
https://www.ecfr.gov/current/title-17/chapter-II/part-240/section-240.13p-1

• RMI — Conflict Minerals Reporting Template (CMRT 6.6):
https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/