Material Declarations Readiness: CMRT, EMRT/AMRT, IPC-1754, REACH & TSCA PFAS

Pillar: Supplier-Ask & Audit Readiness | **Basis:** Batch 4 Material Asks & Batch 5 TSCA Rule | **Primary Source:** RMI / IAEG / EPA (40 CFR 705) | **As Of:** 2026-11-16

Procurement and engineering teams at Washington space suppliers face six distinct material-declaration asks across conflict minerals, extended minerals, aerospace substance lists, EU REACH/RoHS, and EPA TSCA Part 705 PFAS inquiries.

Readiness Checklist & Corpus Traceability

• **CMRT (3TG) & EMRT/AMRT:** Maintain current-revision smelter-level supplier roll-ups per CMRT Conflict Minerals and EMRT/AMRT Extended Minerals.

• **IPC-1754 & IAEG AD-DSL:** Map BOM chemical substances to aerospace formats per IPC-1754 Material Declarations and IAEG AD-DSL Substances.

• **EU REACH SVHC & RoHS:** Track >0.1% w/w SVHC articles for export hardware per EU REACH SVHC & RoHS.

• **EPA TSCA Part 705 PFAS:** Audit fluoropolymer seals, coatings, and lubricants under TSCA PFAS Part 705 Inquiries and EPA TSCA Part 705 LIVE.

Material Declaration Readiness Checklist

Declaration / Rule	Owner & Action	Corpus Source
CMRT (3TG)	Procurement collects annual smelter roll-up	#1786 CMRT
EMRT / AMRT	Track cobalt, mica, copper, nickel & lithium	#1789 EMRT/AMRT
IPC-1754 / AD-DSL	BOM chemical disclosure for aerospace primes	#1792 IPC-1754
EU REACH / RoHS	Screen export hardware for SVHC >0.1% w/w	#1798 EU REACH
EPA TSCA Part 705	Log PFAS-containing seals/coatings & records	#1981 TSCA LIVE

Operator Execution & Boundary Notes

• Route all vendor substance requests through Procurement Material Declarations so engineering approves chemical equivalents once.

• Flag legacy fluoropolymer gaskets and wire insulation early—TSCA Part 705 is LIVE (`40 CFR Part 705`) and affects imported articles.

• Keep signed supplier sub-tier declarations indexed by part number for 5+ years to support prime audits.

Corpus Source Pieces & Primary Authorities

• **CMRT Conflict Minerals:** https://bcesg.org/wa-space-ask-cmrt-conflict-minerals/

• **IAEG AD-DSL Substances:** https://bcesg.org/wa-space-ask-iaeg-ad-dsl-substances/

• **EPA TSCA PFAS Part 705 Inquiries:** https://bcesg.org/wa-space-ask-tsca-pfas-part-705/

• **EPA TSCA Part 705 (LIVE):** https://bcesg.org/wa-space-rule-epa-tsca-pfas-part-705-live/

• **Procurement Material Declarations:** https://bcesg.org/wa-space-role-procurement-material-declarations/

• **40 CFR Part 705 (eCFR):** https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-705

• **Responsible Minerals Initiative:** https://www.responsiblemineralsinitiative.org/

• **IAEG:** https://www.iaeg.com/

Provenance Note: Synthesized from BC ESG Batch 4 (#1786–#1801), Batch 5 (#1981), and Batch 6 (#2055). No new regulatory thresholds added.