

FULL MATERIAL DISCLOSURES

FREQUENTLY ASKED QUESTIONS

INTRODUCTION

A full material disclosure (FMD) is an important tool for organizations that are working to meet evolving regulatory requirements. Many suppliers may not be directly in scope of the same regulations as their customers, but they are often expected to provide information to support their customers' compliance activities. This may involve providing an FMD.

In this FAQ, we will answer some of the most commonly-asked questions about preparing and using FMDs.

ABOUT

1. WHAT IS AN FMD?

An FMD provides complete information on the composition of a product, down to the homogeneous level.

2. WHY AM I BEING ASKED TO SUBMIT AN FMD?

Generally, companies request FMDs from their suppliers in order to gather the data needed to meet a variety of product compliance requirements.

3. WHAT ARE THE BENEFITS OF HAVING AN FMD PROGRAM?

For a supplier, maintaining a robust FMD program ensures that complete product data can be quickly provided to customers upon request. This enables customers to meet a variety of needs — including compliance requirements and strategic product design — and proactively plan for regulatory changes.

DATA EXCHANGE

4. DO I HAVE TO INCLUDE COMPLETE SUBSTANCE INFORMATION IN AN FMD?

You may choose not to disclose proprietary information, or information that could give away a trade secret. However, failure to disclose complete product information could have a negative impact on the customer-supplier relationship, and/or result in a loss of contract.



5. HOW CAN I MAINTAIN A GOOD RELATIONSHIP WITH MY CUSTOMER WITHOUT GIVING AWAY PROPRIETARY INFORMATION?

Reporting requirements surrounding proprietary data can be negotiated between companies. In some cases, suppliers may be allowed to anonymize the substance or mark it as confidential.

If the supplier lists a substance as confidential in an FMD, they can still use the data to generate a compliance declaration by producing a statement confirming:

- » The substance data is accurate every time a restricted substance list is updated.
- » That none of the confidential substances are currently included on any restricted or declarable substance lists.

6. HOW DO I CREATE AN FMD?

Industry-standard schemas such as IPC-1752A and IEC 62474 can fulfill this requirement. Company or industry-standard full disclosure forms, such as safety data sheets or schematics, are also accepted as long as they contain all material/substance disclosures.

The IPC-1754 Material Declaration Standard for Aerospace and Defense is a new standard that establishes the requirements for exchanging substance data across the supply chain for aerospace and defense, heavy equipment, and other industries.

7. WHAT DATA FORMATS BEST SUPPORT FMD DECLARATIONS?

Due to the level of data complexity, FMDs should be submitted in a consistent, machine-readable data exchange format. The IPC-1752A, IPC-1754, and IEC 62474 standards all use eXtensible Markup Language (XML) format, which is the most commonly-used format in various industries.

DATA MANAGEMENT SOLUTION BENEFITS

8. ARE THERE ANY TOOLS AVAILABLE FOR ME TO USE?

A materials declaration tool such as the Assent Materials Declaration Tool can be used to upload, edit and export IPC-1752A and IPC-1754 declaration files.

To learn more about creating and using FMDs, or building an FMD program, contact our regulatory experts at info@assentcompliance.com.



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