



#210

# Material Declaration Training

## How to Handle Substances Not Specifically Reported

*This 'Quick Start' guidance can be used by you, colleagues and suppliers to quickly understand the basics of collecting Material Declaration (MD) data for your product(s)*

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# Material Declaration Training

## 100 Series: Material Regulations

Regulation Overviews  
RoHS  
REACH  
Conflict Minerals  
CA Prop 65  
Canada DSL

## 200 Series: Reporting Parts

Workflow & Examples  
Reporting Options  
Report Training & Templates  
Supplier Data Requirement  
Letter Templates  
Supporting Details

You  
Are  
Here

## 300 Series: Project Management

Assessment  
Planning  
Execution  
Simplified Reporting  
Advanced Techniques  
Additional Resources

Training materials may be found on web page:  
<http://rohsready.org/training.html>



# Roster of Training – 200 Series

## Reporting Material Declarations

- #200 - Reporting a Part (Item)
- #201 - Selecting a Reporting Option
- #202 - Reporting in FMD Format
- #203 - Reporting in Specific MD Format
- #204 - Template for FMD Format
- #205 - Template for Specific MD Formats
- #206 - Supplier Requirement Letter Template
- #207 - Decomposition of BoMs (for Items & Building an MD-BoM)
- #208 - Material and Substance Identification & Weights
- #209 - RoHS Exemptions
- #210 - Substance Not Specifically Reportable
- #211 - Reviewing MD inputs from suppliers
- #212 - Applicability and Exceptions
- #213 - Units Conversion Guide

You are Here



#210

# How to Handle Substances Not Specifically Reported (FMD)

This guidance will help you learn recommended methods for planning and executing your Material Declaration data collection project

Key topics:

Conditions for 'Not Specifically Reported'  
Guidance for Entry to Reporting



# Not Specifically Reported

## ➤ Conditions

- Three primary conditions cover the situation of 'Not Specifically Reported Substance' when reporting to satisfy the RoHS Regulation (ref - Directive 2011/65/EU):  
**Proprietary, Unknown, Undetermined**
  - Manufacturers of products often allow 5% to 10% of the weight of a suppliers article to have this condition
    - **Allowance can help enable Full Material Declaration (FMD)**  
Ref - #200, #201 and #202
    - Confirm the allowance from your Customers
    - Determine how your Customers need this reported
- (cont.)



# Not Specifically Reported

## ➤ Conditions (cont.)

- If this condition is potentially caused by incorrect/missing missing part # identification, wrong supplier identified or similar issue, investigate and correct with engineering, sourcing or others as needed
- Please review occurrence of this condition with your Material Compliance, Regulatory, EHS, Quality or Stewardship leader to confirm specific interpretations or application



# Not Specifically Reported

## ➤ Conditions – Further Definition

### Proprietary

- The specific substance content of the material must be protected as proprietary by the supplier and is not revealed

### Unknown

- The specific material(s) and/or substance(s) are determinable, but do not have a specific substance CAS #(s) identifiable or known.

### Undetermined

- The specific material(s) and/or substance(s) are not determinable or supplier does not have specific information



# Not Specifically Reported

## ➤ Handling in Reporting

Apply the following to any of the 3 possible conditions:

- Ask supplier to provide as much clarification as possible per the following examples:
  - ‘We have reviewed the material and there is no intentional inclusion of regulated/reportable substance(s) by design or formulation.’
  - ‘We cannot determine the specific content of the material by design or formulation and have no further information.’
- Include supplier response from above in record notes
- Apply a ‘coding’ for CAS# indicating which of the 3 conditions exist to aid in future tracking





# Not Specifically Reported

## ➤ Handling in Reporting – Proprietary

For the Proprietary condition :

- Ask supplier to clarify if proprietary material / substances contain regulated/reportable substance(s) by design or formulation
  - Supplier should report as much specific substance content as possible, while still protecting proprietary
  - Supplier should be able to confirm regulation status
  - Low risk of non-compliance
- Require supplier to update when further information can be provided



# Not Specifically Reported

## ➤ Handling in Reporting – Unknown

For the Unknown condition :

- Ask supplier to clarify if unknown material / substances contain regulated/reportable substance(s) by design or formulation
  - Unknown is associated with CAS# unknown, not an absence of information about the material
  - Supplier should be able to confirm
  - Low risk of non-compliance
- Require supplier to update when further information can be provided



# Not Specifically Reported

## ➤ Handling in Reporting – Undetermined

For the Undetermined condition :

- Ask supplier to clarify undetermined material / substances with respect to the other materials in the article or material
  - Provide additional info on the sources of other materials, processes for materials, etc. in the part
  - Can occur for obsolete parts
  - Increased risk of non-compliance vs. other conditions
- Conduct risk assessment with Material Compliance, Regulatory, EHS, Quality or Stewardship leader



# Not Specifically Reported

## ➤ Handling in Reporting – Undetermined (cont.)

For the Undetermined condition :

- Consider action for article based on risk result
  - Risk is low – accept on a conditional basis, require supplier to inform of any updates
  - Risk is increased – work with engineering and sourcing
    - Consider use of screening tests, laboratory analysis or similar (rare need)
    - Consider change of source/supplier for a material/part with documented content



# Not Specifically Reported

- Example (s) ?  
(or in Appendix of #202 ?)



# Next Steps

- Review any substances where supplier has indicated 'Not Specifically Reported' or similar  
Ref - #200
- Define a tracking and periodic review process for parts / items with this condition to enable future review for potential updates
  - Regulation updates may require re-examination of article/part reporting
  - Supplier may be able to provide improved information



# Additional Resources

Please see [www.RoHSReady.org](http://www.RoHSReady.org)  
for additional resources