

SPECIAL CONDITION: Minor Fasteners

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EXPLANATION OF POLICY

Summary

Product manufacturers completing a Product HPD or Supplier HPD may exclude specific types of minor commodity-type fasteners from the typical HPD Open Standard content inventory and hazard screening methods, for up to a percentage of the product weight. The policy identifies two thresholds, both of which comply with the policy: $\leq 1\%$ or $\leq 5\%$. This policy has specific scope limitations and requirements for data reporting.

Use of this Special Condition policy is optional, based on the decision of the manufacturer or supplier. Its use is intended for situations when the manufacturer/supplier has attempted to but cannot obtain detailed content inventory data for fasteners. If that data is available, the typical HPD reporting methods provide a more complete inventory and are preferred.

Scope

This Special Condition has several limitations on scope, as follows.

1. **Types of fasteners:** This policy is limited to sewing thread and solid, preformed fasteners and bearings. For example: screws, nuts, bolts, staples, nails, anchors, washers, buckles, brackets, clamps, clasps, cable ties, clips, clutches, pins, hooks, latches, pegs, retaining rings, as well as ball and roller bearings.
 - HPDC may periodically review this policy to consider additional types of components. This expansion would be based on manufacturer feedback and on the suitability of this reporting framework to those components, as well as harmonization with other organizations using this policy. Contact HPDC at customersupport@hpd-collaborative.org to inquire about other types of components.
 - The following components have been considered by HPDC for suitability under this current policy and are currently not eligible: gaskets, grommets, adhesives, adhesive tapes.
2. **Percentage:** Up to and including 1% or 5% by weight of the total product or part reported on the Product or Supplier HPD may be considered under this Special Condition. Within that threshold, there is no limitation on the weight of an individual fastener. Multiple types of fasteners may be reported under this Special Condition, as long as their combined weight does not exceed 1%/5% of total product/part weight.
 - **Two thresholds:** The HPD is a standardized reporting format that is intended to align with, and be used by, other material health certifications and labels. The $\leq 1\%$ by weight threshold is aligned with some programs, notably Cradle to Cradle Certified. The $\leq 5\%$ by weight threshold is aligned with other programs, notably

Declare. (See “Harmonization” below for more information.) Under this Special Condition, manufacturers may choose the threshold most relevant to their reporting needs. The chosen threshold will be displayed on the HPD as specified below.

3. Grouping: Manufacturers have discretion on the degree to which fasteners reported using this Special Condition are grouped versus itemized separately. It is preferable to list fasteners separately by type. For example, two different types of screws should be inventoried separately, with specific information entered for each one. This facilitates both the detailed reporting requirements herein, and, especially in the case of a Nested Materials Inventory, a better understanding for the HPD user of how the product fits together. However, in products with many different fasteners, there may be reasonable feasibility limitations. Grouping fasteners is allowed provided those different fasteners share the same responses to the required data reporting points below.
4. Commodity-type fasteners: This Special Condition is limited to fasteners that are sourced from third-party suppliers as a commodity. If the fastener is produced in-house by the same manufacturer or supplier that is completing the HPD, there is a reasonable presumption that they can supply typical HPD content inventory data. This applies both to product manufacturers completing a Product HPD and to suppliers completing a Supplier HPD.
 - Definition of commodity-type fastener: For the purposes of this policy, the following guidelines help to identify whether a fastener qualifies as a commodity.
 - Qualifies:
 - Purchased from a third party
 - Made to a generic specification, e.g., ASTM
 - Not made to order for the specific manufacturer
 - Commodity component may be embedded in a made-to-order assembly (only the component qualifies, not the whole assembly)
 - Does not qualify:
 - Made in-house
 - Made to order
 - Not made for other manufacturers
5. Binders, coatings, and finishes
 - Binders, coatings, and finishes: Supplier-applied galvanized coatings, metal plating, or other coatings that are part of the commodity fastener specification may be considered part of the fastener for the purposes of this Special Condition and do not need to be inventoried separately, although any content data about them that is available should be entered in the Notes. Coatings and finishes applied by the *product manufacturer* as part of the product or part manufacturing and assembly process must be inventoried as a separate

substance or material on the HPD, if they fall above the chosen reporting threshold. This applies both to product manufacturers completing a Product HPD and to suppliers completing a Supplier HPD.

6. **Material types:** This policy is not limited to specific material types.
 - The policy was drafted with the expectation that it would mainly be used with metallic components, and secondarily, polymeric ones. However, with composite materials, engineered and refined materials, and other difficult-to-define boundaries, HPDC has chosen in this policy not to place a specific limit on material type.
 - Contact HPDC at customersupport@hpd-collaborative.org to inquire about whether a specific material is well-suited for this reporting method.

Required Data Reporting

Under this policy, manufacturers may report a more limited, specific subset of data than is typically required on an HPD. The following are the substitute data reporting requirements to be used under this Special Condition. All data reporting is optional, but lack of specific data points, as noted here, affects compliance with key indicators for the HPD [see 2.1.2.3 Characterized, Screened, Identified in the HPD Open Standard]:

- The following data is required to be provided for the content to be considered “Screened” on the HPD report:
 - *EU RoHS Conformance*¹. Indicate that the fastener conforms with the material restrictions of Article 4 of the RoHS Directive (2011/65/EU) and EU Directive 2015/863. Note any currently allowed exemptions by number².
 - *EU REACH SVHC Content*³. Indicate that no SVHCs (Substances of Very High Concern) are present in each article at levels above 0.1% by weight, and that it is compliant with all relevant restrictions of Annex XVII, as of the screening date shown on the HPD.⁴
 - Note: If SVHCs *are* known to be present, the HPD may still be marked “Yes” for “Screened” if those substances are reported in the HPD content

For all contents above the threshold, the manufacturer has:

Characterized	<input type="radio"/> Yes <input type="radio"/> No
<i>Provided weight and role</i>	
Screened	<input type="radio"/> Yes <input type="radio"/> No
<i>Provided screening results using HPDC-approved methods</i>	
Identified	<input type="radio"/> Yes <input type="radio"/> No
<i>Provided name and CAS RN or other identifier</i>	

¹ HPDC has chosen RoHS for this policy because it restricts the most toxic metals, flame retardants and phthalates that are of concern to HPDC stakeholders. RoHS thresholds are considered appropriate to this content, and due to demand from the electronics industry, a large volume of RoHS compliant fasteners is available on the market.

² See the link here to a table providing Annex III and IV exemptions:
https://ec.europa.eu/environment/waste/rohs_eee/adaptation_en.htm

³ HPDC has incorporated SVHC reporting requirements. Fasteners are considered as an article under REACH, meaning that there is an obligation to alert the supply chain if a fastener contains over 0.1% of a Substance of Very High Concern (SVHC). There will also be additional reporting requirements introduced by ECHA within the SCIP database in 2021. The requirement also references Annex XVII as a fundamental list of restricted substances.

⁴ As of the publishing of this edition of this guide, the most current SVHC list was published 2022-01-17.

inventory. If the percentage weight of those substances in the component (Nested Materials inventory) or product (Basic Inventory) is known, the percentage weight should be noted. If not known, it may be entered as “Residual/Impurity,” or as a likely range, e.g., 0.1%–0.5%.

- The following data is required to be provided for the content to be considered “Identified” on the HPD report:
 - *An identifier of the fastener(s)*. Be as specific as possible, using the product specification, e.g., “ASTM A325 Steel Structural Bolt,” or a description of its purposes or role in the product, not “Bolt.”
 - *Composition data*. For example, UNS designation for metal alloys, or for polymeric materials, note the type of polymer chemistry, e.g., PVC, epoxy, etc. Be as specific as possible.

Harmonization Note: These HPD screening requirements are aligned with C2C Certified and are an important first step in data reporting for manufacturers wishing to pursue C2C certification. However, a C2C Certified assessor is likely to seek additional documentation after reviewing the data provided here. For example, for non-metallic fasteners, manufacturers will likely need to provide a supplier’s declaration of compliance with the most recent version of the C2C Certified Restricted Substances List / Banned List.

Optional Data Reporting

Providing the following data is optional, but relevant to manufacturers pursuing Declare.

- *LBC Red List Compliance*. If pursuing a Declare label, indicate if ILFI Red List chemicals are present. (This will impact Declare status; see the Declare Manufacturer’s Guide for more information.)

Note to Manufacturers and Suppliers – Use the Supplier HPD to capture fastener content data at the source

This Special Condition recognizes that obtaining detailed content inventory data from suppliers can be difficult, due to the commodity nature of fasteners and methods in the supply chain procurement process that may source such commodities from many different suppliers.

However, to help close the loop on information about the content of fasteners, HPDC strongly encourages manufacturers to request Supplier HPDs—or other transparency documentation—from producers of fasteners. The Supplier HPD enables the producer of a fastener to report the fastener content using the typical content inventory reporting method of the HPD Open Standard. Manufacturers completing a Product HPD for a complete product can then reference the Supplier HPD for that fastener without relying on this Special Condition.

Note that while this policy encourages manufacturers to request Supplier HPDs, documentation of these requests is not required as part of the utilization of this Special Condition.

BACKGROUND: WHY THIS IS A SPECIAL CONDITION

Why this is a Special Condition

Special Conditions have been defined to address situations where a content inventory can be created in theory with current HPD methods, but it is not practical to do so, and the value of having a complete inventory does not clearly justify the costs to create it, in terms of providing to decision-makers useful insight into the human and environmental attributes of a product.

In the case of fasteners:

- It may not be feasible to obtain content inventory data for fasteners purchased as commodity components, given variable composition and sourcing methods.
- Product manufacturers completing HPD reports have indicated that it is particularly difficult to obtain information necessary for a content inventory from third-party suppliers of fasteners and small hardware components.
- While detailed information supporting a “typical” HPD content inventory is difficult to obtain, less-detailed information is feasible to obtain, and alternative screening information can be obtained per relevant regulations (specifically, EU RoHS and REACH SVHC).

This Special Condition is specifically intended for components representing a nominal proportion of the total product mass. This guidance may be revisited or phased out as the availability of data on such components improves over time.

Harmonization

This Special Condition has been harmonized with the following:

- Declare has an exception for hardware that aligns with the percentage exclusions described in the scope. Declare defines “small product hardware” as “Individual pieces of product hardware... less than 0.5% of the weight of the finished product and no more than 5% by weight of the complete product.” In Declare, product hardware must be reported by ingredient and CAS RN. However, supplier documentation is not required, even for verified Declare labels. This acts as an exception in which product manufacturers may provide content inventory data using their own best judgment, with documentation expectations relaxed. “Product hardware will still impact Declaration Status if Red List chemicals are used.”
- The C2C Certified v4 standard (as of this date, in draft/proposed form) contains an exemption for the following components for the purpose of the Material Health assessment: sewing thread and preformed fasteners and bearings. Exempt components may not represent more than 1% of the product by weight. The supplier/manufacturer of the fastener or bearing must provide an attestation that the component is RoHS compliant.

- ANSI/BIFMA e3 – 2019 Section 6.7 Life Cycle Assessment (LCA) contains the following exemption: “Unless otherwise specified, processes for the manufacture of small components (e.g., fasteners, screws, washers, glides, labels), that combined comprise up to 5% of the product by weight, may be excluded from the scope of LCA credits.” In Section 7.5 Product Level Chemical Inventory, Assessment, and Optimization, there is no exception for small components; however, manufacturers may choose to exclude them from the identification and assessment process depending on the level of certification being sought, based on meeting threshold requirements.

INSTRUCTIONS

Special Conditions instructions for specific data fields follow; ***if there are no Special Conditions instructions for a data field, the requirements of the HPD Open Standard should be followed.*** If the HPD Open Standard and Special Conditions instructions are followed, the use of the policy will not prevent the HPD from qualifying for the LEED v4/4.1 Material Disclosure and Optimization, Material Ingredients credit.

*Data field auto-fills if using HPD Online Builder

HPD Data Field	Special Condition Reporting Requirements
SECTION 1: SUMMARY	
Content in Descending Order of Quantity*	Component content is listed by name, e.g. “ASTM A325 Steel Structural Bolt,” as instructed in Section 2.
Characterized, Screened, Identified*	“Yes” should be checked if all Standard requirements are met, and all reporting requirements are met below. See notes below where “No” should be marked for one or more indicators.
Inventory and Screening Notes*	Include the following notes: <ul style="list-style-type: none"> ○ “Special Conditions applied: [MinorFastener].”
SECTION 2: CONTENT IN DESCENDING ORDER OF QUANTITY	
Nested Materials – instructions apply only to Nested Materials Inventory format	
Material Name (top	A fastener should usually be entered as its own Material in a Nested Materials inventory. In this case, enter a descriptive name here for the

level in Nested inventory)	fastener, e.g., “ASTM A325 Steel Structural Bolt,” etc.
Residuals and Impurities Notes	<p>Instructions are applicable if marking “Yes” for considering residuals and impurities for this Material or Product.</p> <ul style="list-style-type: none"> Enter “Defined by UNS” if you are reporting a fastener made with a metal alloy with a UNS designation, or “Defined by CEN,” etc., depending on the classification system you are using. <p>Enter any other information as applicable to the material type or method for considering residuals and impurities.</p>

Content – instructions apply to both Nested Materials and Basic Inventory formats. Enter the alloy content as a Material, not a Substance, using the following data fields. These fields are customized to this Special Condition guidance. Fields unique to this Special Condition are marked below with a double asterisk**. This mockup shows a typical result of the following instructions:

ASTM A325 STEEL STRUCTURAL BOLT ID: Fastener

HAZARD DATA SOURCE: **HPDC Special Conditions Policy**

%: 1.0000 - 1.0000 GreenScreen: **Not Required** RC: **None** NANO: **No** MATERIAL ROLE: **Fastener**

HAZARD TYPE	AGENCY AND LIST TITLES	WARNINGS
Hazard Screening is not applicable to this Special Condition		

COMPONENT COMPOSITION: **Stainless Steel UNS S30400**

COMPONENT SCREENING: Conformant with the material restrictions of Article 4 of the RoHS Directive (2011/65/EU) and EU Directive 2015/863; no SVHCs (Substances of Very High Concern) are present in the article at levels above 0.1% by weight, and it is compliant with all relevant restrictions of Annex XVII as of the screening date.

LBC RED LIST COMPLIANCE: **No LBC Red List chemicals.**

MATERIAL CONTENT NOTES: **No EU RoHS exemptions.**
This material is contributing to a ≤1% threshold for minor fasteners in this HPD using this Special Condition.

Material Name	Enter a name for the fastener. This may be generic (“Bolt”) or more specific (“ASTM A325 Steel Structural Bolt”). Greater specificity is strongly encouraged.
ID (Identifier):	Enter “Fastener”
Hazard Data Source*	Enter “HPDC Special Conditions Policy.”
GreenScreen*	Enter “Not Required.”
Material Role	Select an appropriate role. This will most likely be “Fastener.”

<p>Hazards and Agency(ies) with Warnings*</p>	<p>Enter “Not required under this Special Condition.”</p>
<p>Component Composition*</p>	<p>Enter the most specific available composition data, such as UNS designation for metal alloys, or polymer type for plastic fasteners.</p>
<p>Component Screening**</p>	<p>Note: The following dialogue results in a two-part fastener screening statement. Both parts are required.</p> <p>The manufacturer will be presented with the following dialogue:</p> <ol style="list-style-type: none"> 1. EU RoHS Conformance Question: “<i>EU RoHS Conformance</i>. Indicate that the component conforms with the material restrictions of Article 4 of the RoHS Directive (2011/65/EU) and EU Directive 2015/863. You will have the opportunity later to note any currently allowed exemptions. [Yes/No] 2. EU REACH SVHC Content. Question: “<i>Special Condition REACH SVHC Requirements</i>. Select ‘Yes’ if the fastener meets the REACH SVHC (Substances of Very High Concern) requirements outlined in this Special Condition: SVHCs are <u>not</u> present in the article over 0.1% by weight, and the component complies with all relevant restrictions of Annex XVII, as of the today’s date. Otherwise, select ‘No.’” [Yes/No] 3. EU RoHS exemptions Question: “Note any EU RoHS exemptions being claimed here.” [open data field] Enter response in Material Notes, below. 4. [Display this question if “No” was selected for Question 2.] Question: “You indicated that SVHCs are present in the article over 0.1% by weight. For this material and this HPD to be considered “Screened,” these must be entered on the HPD content inventory with either percentage weights, or as “Residual/Impurity” for this material. OR, if you do not have this information or prefer not to disclose it, this material cannot be considered “Screened” and the HPD will be marked “No” for “Screened.” [Substances will be reported on the HPD/Substances will not be reported] <p>Output from dialogue:</p> <ul style="list-style-type: none"> • If “Yes” was entered to questions 1 and 2: <ul style="list-style-type: none"> ○ the HPD may be marked “Yes” for “Screened” (if there are no other obstacles to this elsewhere on the HPD),

	<ul style="list-style-type: none"> ○ and enter the following in Component Screening: “Conformant with the material restrictions of Article 4 of the RoHS Directive (2011/65/EU) and EU Directive 2015/863); no SVHCs (Substances of Very High Concern) are present in the article at levels above 0.1% by weight, and it is compliant with all relevant restrictions of Annex XVII as of the screening date.” ● If “No” was entered to Question 1: <ul style="list-style-type: none"> ○ the HPD must be marked “No” for Screened. ○ enter “Not EU RoHS Conformant” at the beginning of the Fastener Screening statement. ● Any result from Question 3 should be entered into the Material Notes field. ● If “No” was entered for Question 2, check the response to Question 4: <ul style="list-style-type: none"> ○ If “Substances will be reported on the HPD”: <ul style="list-style-type: none"> ▪ HPD can be marked “Yes” for Screened, ▪ and modify the SVHC part of the screening statement as follows: “SVHCs (Substances of Very High Concern) are present in the article at levels above 0.1% by weight and are reported on the HPD content inventory.” ▪ and present the following dialogue in the HPD Builder: “Please proceed to enter SVHCs present in the article above 0.1% in the HPD content inventory, either with known percentage weight, or as ‘Residual/Impurity.’” ○ If “Substances will not be reported” is selected: <ul style="list-style-type: none"> ▪ HPD is marked “No” for Screened, ▪ and modify the SVHC part of the screening statement as follows: “SVHCs (Substances of Very High Concern) are known to be present in the article at levels above 0.1%, but are not disclosed on this HPD.”
<p>LBC Red List Compliance** (optional)</p>	<p>If pursuing a Declare label, indicate if ILFI Red List chemicals are present. (This will impact Declare status; see the Declare Manufacturer’s Guide for more information.)</p>

<p>Material Notes**</p>	<p>Enter any optional notes here. Note “EU RoHS exemptions:” with any numbers noted above.</p> <p>In addition, the manufacturer will be presented with the following dialogue:</p> <p>1. This Special Condition offers the choice of two thresholds. A $\leq 1\%$ by weight threshold is aligned with some programs, notably Cradle to Cradle Certified. A $\leq 5\%$ by weight threshold is aligned with other programs, notably Declare. You may choose the threshold most relevant to your reporting needs, and it will be displayed on the HPD. Please select: [This material is contributing to a $\leq 1\%$ threshold for minor fasteners in this HPD using this Special Condition. / This material is contributing to a $\leq 5\%$ threshold for minor fasteners in this HPD using this Special Condition.] <i>Display choice in Material Notes.</i></p>
<p>SECTION 3: CERTIFICATIONS AND COMPLIANCE</p>	
<p>No changes to requirements for Special Conditions</p>	
<p>SECTION 4: ACCESSORIES</p>	
<p>No changes to requirements for Special Conditions</p>	
<p>SECTION 5: GENERAL NOTES</p>	
<p>No changes to requirements for Special Conditions</p>	
<p>SECTION 6: REFERENCES</p>	
<p>No changes to requirements for Special Conditions</p>	