

Product Compliance Frequently Asked Questions

No.	Question	Response	Reference
1.	What is an MDS?	MDS stands for Material Data Sheet, it is the structure used to report in IMDS or CDX.	
2.	Can I submit a new datasheet?	A new datasheet is only needed if the part number is new or has been changed, if received in place of a revised datasheet will result in a rejection of the submission.	IMDS Recommendation 001 Section 3.2.1
3.	Can I just send a letter saying my product meets requirements?	A letter is only good for a brief period, as CES 10903, the Cummins list of declarable / restricted and prohibited substances, is revised twice per year. It is Cummins policy to require Full Material Disclosure (FMD) submission of an MDS via IMDS or CDX.	Cummins Product Compliance Manual, Section 12
4.	What substances need to be reported?	All substances that are present in the finished product must be reported.	Cummins Product Compliance Manual, Section 4
5.	What changes require revision of an MDS submission?	Changes in material, weight, updates to prohibited and declarable / restricted substances, application codes or classifications require updates to MDS submissions	Cummins Product Compliance Manual, Section 5, 6, & 10
6.	Can I submit using my part number/name?	No, you must use the Cummins part number and name in your MDS submissions.	Cummins Product Compliance Manual, Section 9 & 10
7.	Can I use Jokers or Wildcards?	Yes, but you cannot use the Joker or Wildcard to hide a prohibited or declarable / restricted substance. No more than 10% of substance content can be Joker/Wildcard	Cummins Product Compliance Manual, Section 8
8.	Do I need to check my submission before sending?	Yes, MDS checks need to be completed before submission. You should be checking your submission to IMDS/CDX and Cummins requirements.	Cummins Product Compliance Manual, Section 9
9.	How long will it take to get my submission checked?	Due to complexity of some MDS receipts, it may take up to 30 days to receive a disposition on a submission.	
10.	Are there other ways to submit product data?	Cummins only accepts other types of product data submission when special permission is given in writing.	Cummins Supplier Requirements Manual

Most Frequent MDS Rejections

Rejection Cause		Correction
1.	Norms / Standards are not provided for Material more than 5g weight in Material Classification 1x to 4x.	Add Norms and Standards to material or use IMDS Committee materials in component.
2.	Use of Classification: 1.1 Steels / cast steel / sintered steel is used for materials which should be classified as 1.1.2 Highly alloyed or 1.1.1 Unalloyed, low alloyed.	Material classification 1.1 is only permitted to be used for Sintered steel. Any other type of metal must have three-digit material classifications. Find full list of proper application codes in Recommendation 001 Annex A.
3.	Incorrect classification of materials. Example use of 7.3 Other compounds (e.g. friction linings) classification and others.	Please refer to Recommendation 001A to identify proper classification of all materials. This information applies to CDX submissions also.

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4.	Polymeric part marking not present or answering question “No”.	Polymeric marking is required for legal purposes in multiple countries. This question must be answered as “Yes” or “NA”, no other response will be accepted.														
5.	Use of Application code 32 for Nickel.	Application code 32 should only be used for components that are routinely touched such as knobs and key fobs. All other materials using nickel or nickel alloys must use Application code 33 or 34.														
6.	Water or solvent being used in a cured (dried) material.	Substances such as paint or ink, must be reported in the cured state, water, solvent, or any other type of liquid should not be present. These submissions will be rejected.														
7.	Use of incorrect application code.	IMDS only suggests an application code for your substance, you need to verify the proper application code is used for your substances. A list of available application codes is available on the IMDS Public pages @ https://public.mdsystem.com/en/web/imds-public-pages														
8.	Range of portion may not exceed allowed percentage.	Per Recommendation 001 Rule 4.3.2.B, “If the portion type “range” is selected, for semi-components or materials that are attached to a semi-component, the following maximum portion range applies: Maximum $M = Y\% - X\% M \leq 20\%$.”														
9.	A polymer material (classification 5.1.b) should have at least two substances attached.	Per Guideline 4.4.1.A, “A polymer material (classification 5.x) should have at least two substances attached to it.” Most OEM customers reject for this warning. Make sure to attach two substances to these material types.														
10.	Prohibited CES 10903 substances being used in materials and components.	Please refer to the link below for access to the Cummins Prohibited and Restricted Substance list: https://supplier.cummins.com/materials-disclosure-requirements-and-guide														
11.	Excess Weight deviation.	Per IMDS Recommendation 001, Rule 4.2.2.C, The deviation between measured and calculated weight per item must not exceed the defined values in the table below. <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Weight of component (X)</th> <th>Max. deviation in %</th> </tr> </thead> <tbody> <tr> <td>$X < 1g$</td> <td>100%</td> </tr> <tr> <td>$1g < X \leq 100g$</td> <td>10%</td> </tr> <tr> <td>$100g \leq X < 1kg$</td> <td>5%</td> </tr> <tr> <td>$1kg \leq X < 10kg$</td> <td>2%</td> </tr> <tr> <td>$10kg \leq X < 100kg$</td> <td>1%</td> </tr> <tr> <td>$X \geq 100kg$</td> <td>0.5%</td> </tr> </tbody> </table>	Weight of component (X)	Max. deviation in %	$X < 1g$	100%	$1g < X \leq 100g$	10%	$100g \leq X < 1kg$	5%	$1kg \leq X < 10kg$	2%	$10kg \leq X < 100kg$	1%	$X \geq 100kg$	0.5%
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12.	Assume pressing the green check mark checks the entire MDS.	The green check mark is the equivalent of spell check in IMDS, it performs the SC90 checks only. Manual checks are still required to be completed. Do not forget to check the right side of the MDS, focusing only on the tree misses many items that may cause a rejection.														

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13.	For CDX – 100% declaration box not checked	100% declaration box must be checked
14.	Part or material naming errors such as including “Copy_” or part number in the name, name not being descriptive.	Per Recommendation 001 Rule 4.2.2.D, “If no name is available which is described in a public standard, then the name must be descriptive”. Use a substance name that a person not familiar with the industry will understand.
15.	Missing recycle information.	Recyclate information must be shared if available. For 5.x material classification, recyclate question must be answered YES or NO. If YES, complete the required Recyclate screen.
16.	Use of Jokers and Wildcards for more than 10% of reported substances.	Per Recommendation 001, Rule 4.5.3.E “The sum of confidential substances, including jokers/wildcards for highly confidential substances, must not exceed 10 % of a material.” Rule 4.5.3, “Wildcards must not be used to hide substances that are declarable or prohibited according to GADSL, an SVHC, or require an application code.” It is easier to identify the substance as “Confidential” than to try to use Jokers or Wildcards. Do not use “Rest” with a Joker or Wildcard because it can cause the percentage to be over the 10% allowed.
17.	Deactivated MDS/Modules being used.	Do not use MDS with deactivated MDS or modules unless for legacy or aftermarket products. Request an updated submission from your supplier.
18.	For CDX – Supplier code must be present.	Include supplier code in proper field.
19.	Preliminary MDS box checked.	Do not check the Preliminary MDS box, we cannot use the submission. A resubmission without the box checked will be requested.
20.	Additional questions not answered above?	Contact us at supplier.compliance@cummins.com

Note: Text in blue is CDX specific information

Useful Links:

To get an IMDS account set up and see available IMDS training: <https://www.mdssystem.com/imdsnt/faces/login>

OEM Specific requirements and public information: <https://public.mdssystem.com/en/web/imds-public-pages>

Supplier Portal Materials Disclosure Requirements, including Prohibited and Declarable Substances Lists: <https://supplier.cummins.com/materials-disclosure-requirements-and-guide>

Cummins Product Compliance Manual: <https://supplier.cummins.com/sites/supplier-portal/files/03-2023/Cummins%20Product%20Compliance%20Manual.pdf>