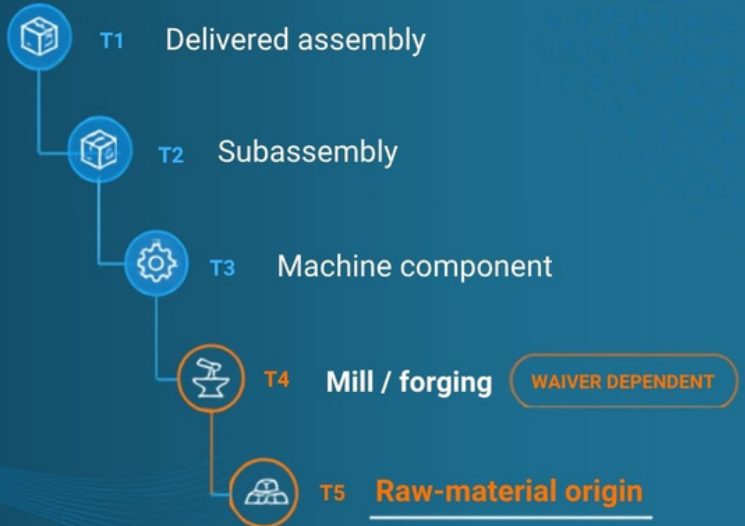


The waiver door closes

Prime or subcontractor at any tier.
The unit of proof is raw-material origin.



The Five Things Your Prime Will Ask For, and Where Each One Lives in Your Records

Executive Order 14415 (signed July 20, 2026) requires defense primes to trace every program to raw-material origin and to screen every supplier beneath them. Your Prime cannot provide the data without your input, so the obligation arrives at your desk as a data questionnaire **due on January 1st, 2027**

This brief lists the five requests you can expect from your Prime. Each answer already lives in your systems, but not knowing where to find them usually stops a supplier from responding. Those suppliers who answer with evidence stay on the program. The ones who answer with estimates get second-sourced.



01 Melt origin, per material

Not where you bought the material but where it was melted or produced. For specialty metals this is the question the law actually asks, and "our distributor is in Ohio" is not an answer. You will need the data per covered material, per part number.

WHERE IS THIS DATA?

Mill test reports and certificates of conformance are in your quality records; heat or lot numbers on receiving documents; your distributor's certificate package.

THE USUAL GAP

Certifications are filed by purchase order, not by part number, so the answer exists but cannot be assembled per product without a manual hunt. Distributor certifications often name the distributor, but not the mill.



02 An indentured Bill of Materials

"Indentured" means your parts broken down level by level to the materials inside them - component, subcomponent, material, by source - in a structured, exportable format.

WHERE IS THIS DATA?

Your ERP's BOM module holds the structure; routing and item masters hold the material identities; purchase records tied to each supplier.

THE USUAL GAP

The BOM stops at what you buy. The levels below, what your supplier put into the casting you purchased, are in their system, not yours, and these have never been requested.



03 Your supplier's suppliers

Who sits beneath you: the sources behind your Tier 1 vendors, so the Prime can screen the full chain for foreign ownership, control, or influence and financial measures. Expect to be asked to name sub-tier sources for critical items and to flow the same question down.

WHERE IS THIS DATA?

Nothing in your systems holds this needed data today. The fix is VERY transactional (a flow-down in your POs) and takes weeks of supplier correspondence, which is why starting after the questionnaire arrives is too late.

THE USUAL GAP

Approved vendor lists, supplier quality agreements, and mostly in your suppliers' own records, reachable only by asking.



04 Your single points of failure

The biggest fail point is where you depend on one supplier, one facility, or one country for anything critical. The order names sole-source dependence and over-reliance on a single source as a risk category. PRIMES must screen for - and the Department of War will model concentration risk from the data PRIMES submit, using AI. Your concentration will be visible; the question is whether you saw this first.

WHERE IS THIS DATA?

Country concentration hides one level down - three different vendors who all buy from the same country looks diversified in your system when, in fact, it is not.

THE USUAL GAP

Derivable from your ERP: spend by vendor by item, single-sourced can be flagged to identify supplier country of origin.



05 The certificates behind every answer

PRIMES must file evidence, not assertions, so each answer above needs a document behind it: mill certifications, certificates of conformance, country-of-origin declarations, and records that connect each document to the part and program it supports.

WHERE IS THIS DATA?

The documents exist, but no index ties certification to part to program, so every response is manual and time consuming.

THE USUAL GAP

Quality management system records, supplier cert packages, and receiving inspection files.

What to do in the next 30 days

The gaps surfaced above become a work list. Sequenced correctly, they close before the questionnaire arrives.



Map your
supplier network

Map your Bill
of Material

PRIME-ready
Auditable Evidence
(Digital Product Passport)



Get a Head Start Before the Questionnaire Arrives

Sustain360° provides evidence package from data already in your ERP system: every material traced to the mill, sub-tier suppliers illuminated, single-country concentration flagged with the dollar exposure it carries, and origin documentation in a form PRIMES will accept. LET US run our DIGITAL PRODUCT PASSPORT program on one product line at NO COST, for a week, nothing to install, and what we find is yours either way!

