

Webinar Q&A: Understanding Extended Minerals: Meeting Due Diligence Requirements under Battery Regulations

How do you recommend addressing responsible mineral sourcing requirements for critical minerals that fall outside the scope of CMRT & EMRT? Does CDX also handle AMRT data?

Can DXC provide RMI member-only data to CDX clients which are also RMI members?

We are not falling under Battery Regulation - i.e. general due diligence approach by my company would be the reason to "investigate" EMRT, right? But it can be denied too, as there is no legal demand, correct?

Who is responsible for fulfilling the due diligence requirements for battery obligations—the manufacturer, the company that sold the product, or both?

When filling out EMRTs how are materials such as Stainless Steel handled due to nickel or copper being present in small percentages?

Is it necessary to have an IMDS Connect license to migrate data from IMDS to CDX?

Do we need a license for EMRT? Can't we do it with the free version? If it is free then, can we upload our own EMRT to CDX and then add a recipient directly?

How can we obtain an account? Is the same account as for IMDS?

If suppliers can't send EMRD to cdx account, if there any other solution to put the declarations EMRT or CMRT into CDX?

Regarding the Packaging Waste Regulation is it possible to use the CDX data to demonstrate compliance to chemical restrictions of this requirement? what is the standard for that requirement?

How do you recommend addressing responsible mineral sourcing requirements for critical minerals that fall outside the scope of CMRT & EMRT? Does CDX also handle AMRT data?

For minerals outside 3TG and the EMRT scope (e.g. other critical or high-risk minerals), the RMI provides the Additional Minerals Reporting Template (AMRT), which lets you track up to ten user-selected minerals of concern per template. RMI reports the correct questions to ask for these additional minerals are not yet known, and the AMRT does not follow any underlying data exchange standard to facilitate rollup. So the RMI's intention is to add AMRT minerals to the EMRT as the business needs become better understood. Today CDX supports CMRT and EMRT natively.

Can DXC provide RMI member-only data to CDX clients which are also RMI members?

As over 98% of EMRT users are not RMI members, RMI imposes substantial restrictions on use of non-public information, and RMI member-only information cannot be shared with non-members, DXC provides only publicly available information. This ensures all companies using CDX are sharing the same information, reducing confusion and improving communication.

We are not falling under Battery Regulation - i.e. general due diligence approach by my company would be the reason to "investigate" EMRT, right? But it can be denied too, as there is no legal demand, correct?

If your company is not subject to the EU Battery Regulation, there is no legal obligation to complete or provide an EMRT. However, your customer's own due diligence program may drive the request, they need supply chain data to fulfill their obligations, which is a valid business reason to ask.

That said, a supplier receiving such a request may be permitted to deny it, as they may have no legal mandate which applies to them, and they may not have contractual obligations to their customers. As with the CMRT, most companies which create them do so from a contractual obligation rather than a direct legal requirement. The Responsible Sourcing Initiative (RMI) itself acknowledges that this and companies not subject to the Regulation should set expectations with their suppliers and customers around EMRT reporting. This would include information about which minerals they have prioritized and why, and recommends reaching consensus in advance on whether and when a response can be provided. Before refusing, companies should consider the potential risks of unknown and unasked supply chain misconduct.

In practice, refusal is legally defensible, but declining may create commercial friction, as customers increasingly embed EMRT requests into supplier onboarding and ESG audits.

Who is responsible for fulfilling the due diligence requirements for battery obligations—the manufacturer, the company that sold the product, or both?

Under the EU Battery Regulation (EU) 2023/1542, the due diligence obligation applies to economic operators placing batteries on the EU market. In practice: the manufacturer is responsible if the battery is produced within the EU, while the importer takes on the obligation when batteries originate from outside the EU. Distributors play a supporting role verifying compliance, but are not required to conduct full supply chain due diligence. Beyond the regulation requirements, companies which are suppliers to companies with regulatory obligations may have contractual obligations.

These obligations apply only to large companies (annual turnover above €40M) and cover EV batteries, industrial batteries >2 kWh, and LMT batteries. SMEs are exempt.

When filling out EMRTs how are materials such as Stainless Steel handled due to nickel or copper being present in small percentages?

In the EMRT, what matters is not the percentage but the intent. If a mineral (like nickel in stainless steel) is intentionally added as part of the alloy specification, it must be declared and the full smelter traceability chain applies. If it's only an incidental trace contaminant, not part of the material design, it can be answered "No" and no further reporting is needed.

Is it necessary to have an IMDS Connect license to migrate data from IMDS to CDX?

Although IMDS information can be made available in CDX with an IMDS Connect license, CDX is a separate product. Your organization would need a separate CDX account, and some functionality would require a license.

Do we need a license for EMRT? Can't we do it with the free version? If it is free then, can we upload our own EMRT to CDX and then add a recipient directly?

There is no license needed to use the EMRT itself, or to upload an EMRT to CDX for submission to a licensed CDX RMD Manager client. If your company would benefit from and appreciate the robust capabilities CDX adds to send EMRT Requests, manage and aggregate the responses and document your company's due diligence, then a CDX RMD Manager license is required.



How can we obtain an account? Is the same account as for IMDS?

To get a CDX account, you register your company via the CDX login page (“Register your company”) and set up a company administrator. After email activation you can start using CDX. Any CDX Company Administrator can order a license using menu Administration à Licenses. IMDS and CDX are separate systems, but they are operated by the same provider (DXC Technology).

If suppliers can't send EMRD to cdx account, if there any other solution to put the declarations EMRT or CMRT into CDX?

Suppliers can submit EMRTs to CDX clients at no cost to themselves simply by registering for a CDX supplier account. Suppliers who register receive the benefit of seeing the CDX EMD “quality check” results, helping reduce rework and making the extra effort to upload worthwhile. Suppliers can also send EMRT/CMRT as normal RMI Template Excel files by email or via a supplier portal. Your company (as CDX user with license) then imports those templates into CDX and assigns the resulting declaration to the request. So suppliers do not have to log into CDX themselves; you can collect the Excel templates off-system and then upload/import or manage them centrally.

Regarding the Packaging Waste Regulation is it possible to use the CDX data to demonstrate compliance to chemical restrictions of this requirement? what is the standard for that requirement?

Today, CDX can already be used to document packaging material composition and support evidence for PPWR-related substance limits. Beyond that, dedicated PPWR functionality is on our roadmap: while it is not in immediate development, it remains an active candidate and is under ongoing evaluation. We see this as an open door for collaboration, and we invite companies that see strategic value in such a solution to co-fund and shape it as a dedicated project. If this is a priority for your organization, we would be very happy to discuss how we could initiate such a project together.



DXC Technology

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