

## DFARS Compliance: A SHORT GUIDE TO FULL COMPLIANCE

An American Wire Cloth Institute position statement on compliance with the requirements of the Defense Federal Acquisition Regulation Supplement (DFARS), clauses 252.225.7008, 252.225.7009, and 252.225.7014, ALT 1, Reserved, "Specialty Metals Restriction". (10 U.S.C. 2533b)

"Specialty Metals" include:

Stainless Steel	Inconel	Monel
Nickel	Nickel-Chrome	Titanium
Tantalum	Hastelloy	Carpenter
Tungsten	Zirconium	Aluminum

And other Steel alloys, containing significant percentages of Nickel, Chrome, Aluminum, Cobalt, Columbium, Molybdenum, Titanium, Tungsten, Vanadium, and Zirconium, etc.

Clause 252.225.7008: "Special Metals" melts restricted to U.S.

Clause 252.225.7009/252.225.7014: "Specialty Metals" melts from U.S., or qualifying countries

Qualifying countries [DFARS 225.003 (10)] include:

Australia	Egypt	Israel	Norway	Switzerland
Austria	Estonia	Italy	Poland	Turkey
Belgium	Finland	Japan	Portugal	United Kingdom/Northern Ireland
Canada	France	Latvia	Slovenia	United States
Czech Republic	Germany	Luxemburg	Spain	
Denmark	Greece	Netherlands	Sweden	

When a United States prime contractor, or sub-tier contractor wire cloth purchaser, invokes a "DFARS compliant" clause, for either wire cloth or a fabrication including wire cloth as a key component, this Restriction on Acquisition of Certain Articles Containing Specialty Metals is mandatory, and must be passed down to all sub-contractors. Only wire cloth containing specialty metal melted in the United States, or a qualifying country, can be offered, or supplied. No deviation is permitted, except with the expressed written permission of the United States prime contractor.

Certifications from your wire supplier, or supplier of wire cloth, reading "Country of Origin", will not suffice. It is the "Country of Melt" that is the key to compliance. To confirm the authenticity of the "Specialty Metal" product you supply to your customer, certification should be supplied identifying the "Country of Melt".

Cautionary Note: Prime contracts issued prior to 2017 may not accept melts from all of the current qualifying countries. Prime contracts issued in 2017 and subsequent years, are more likely to accept melts from all countries listed. However, it will depend on the terms and conditions found in each prime contract.