

# EDA REACH Roadmap 2018 - 2020

TASK NAME	2017				2018												2019												2020																			
	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12	1	2	3	4	5	6	7	8	9	10	11	12								
<b>1. EDA ROLE IN REACH DEFENCE MATTERS (including Study Proposal 9.3.7)</b>																																																
(a) EDA REACH Plenary meetings with Member States (MS), covering all REACH Activities - Workpackages.																																																
(b) EDA REACH Task Force: Administration of work, covering specific REACH Workpackages at technical level																																																
(c) Interact with the European Commission (EC)																																																
(d) Interact with the European Chemical's Agency (ECHA)																																																
(e) Interact with the European Space Agency (ESA)																																																
(f) Interact with Defence Industry																																																
<b>2. R&amp;D FUNDING SCHEMES FOR INNOVATIVE SUBSTITUTION (Study proposal 9.1.1)</b>																																																
(a) Interact with EDA internal stakeholders responsible for EU-level R&T&D funding mechanisms (e.g. ESIF, EDIDP, EDF), providing input on REACH-specific considerations, as necessary.																																																
(b) Monitor evolution of discussions between EC, EDA and MS on EU R&T&D funding mechanisms (e.g. ESIF, EDIDP, EDF), providing input on REACH-specific considerations, as necessary.																																																
<b>3. COLLABORATIVE R&amp;T (Study Proposal 9.1.2)</b>																																																
(a) Liaise closely with EDA R&T communities (mainly CapTechs) on REACH considerations, in general, and promote enhanced collaborative R&T projects for innovative substitution of SVHCs, in particular.																																																
<b>4. EC REACH REFIT 2017 OUTCOME AND RELATED WAY-AHEAD FOR DEFENCE</b>																																																
(a) Monitor progress of EC's REACH Refit 2017 process and engage with EC in view of maximising the uptake of the following proposals and supporting their implementation: - Prolonged Annex XIV (authorisation) Timelines (Study Proposal 9.1.3) - Risk Management Option Analysis (RMOA) (Study Proposal 9.2.1) - Clarify REACH Links with Other EU Laws and Policies (Study Proposal 9.2.3) - Simplified Applications for Authorisation (AFAs), Specific Cases (Study Proposal 9.3.2) - REACH Art. 33 Revision (Study Proposal 9.3.4) - "Super" Downstream User (DU) Platform (Study Proposal 9.4.1) - EC REACH/CLP Single Web Hub (Study Proposal 9.4.3)																																																
(b) Analyse the EC REACH Refit 2017 Outcome (Final Report published 5 March 2018) vs. EDA REACH Study recommendations																																																
(c) Identify/endorse potential further actions/measures to support MS in minimising impact of REACH on Defence																																																
(d) Prioritise/Plan/Implement actions/measures identified under sub-task (c) above																																																
<b>5. ENGAGE WITH ECHA ON THE IMPLEMENTATION OF THE FOLLOWING EDA STUDY PROPOSALS (addressed to ECHA):</b>																																																
- Substance Tracking Tool (Study Proposal 9.4.2)																																																
- Authorisation Exemption Guidance (Study Proposal 9.4.4)																																																
<b>6. EDA CODE OF CONDUCT ON REACH (including Study Proposals 9.3.6 and 9.5.7)</b>																																																
<b>(a) Harmonization of REACH Defence Exemptions</b>																																																
(1) Conduct a mapping of current status of defence exemption procedures at national level																																																
(2) Monitor progress of harmonisation/EDA CoC implementation at national level																																																
(3) Maintain/Update EDA REACH Portal on the basis of inputs from Member States																																																
<b>(b) Promotion / implementation of reciprocal acknowledgement of REACH defence exemption decisions, among MS</b>																																																
(1) Monitor MS actions on incorporating reciprocal acknowledgement provisions on their national REACH defence exemptions procedures, and provide support to MS, if requested.																																																
(2) Share/disseminate MS best practices on reciprocal acknowledgement of REACH defence exemptions																																																
(3) Mapping of MS provisions on reciprocal acknowledgement of national REACH defence exemptions (a) MS to provide input on provisions concerning reciprocal acknowledgement of REACH defence exemptions of other MS, within their national procedures (b) Examine the input provided by MS																																																
<b>(c) Transparency of REACH Art. 2(3) Procedures and Decisions (Study Proposal 9.5.1)</b>																																																
(1) Internal Transparency between MS) Preparatory phase, gathering initial inputs/proposals from TF																																																
(2) Internal Transparency between MS) Define / propose the level of information to be disclosed on defence exemption decisions																																																
(3) Internal Transparency) Discuss proposals with pMS (non-Task Force) that have already granted REACH defence exemptions - approve at plenary level																																																
(4) Internal Transparency between MS) Implement / liaise with MS to provide the agreed information on the defence exemptions granted so far - analyse pMS approaches (especially when same substances have been exempted)																																																
(5) External Transparency towards external stakeholders) Discuss/Define/Approve Information (subset of information agreed under internal transparency) that may be disclosed also to external stakeholders (publicly)																																																
<b>(d) Evolutions of EDA CoC on REACH</b>																																																
<b>(1) Legal clarification of Art. 2(3) whether exemptions granted by individual MS "in the interest" of defence apply automatically in other EU MS (Study Proposal 9.3.6)</b>																																																
(a) Development and circulation of written proposal by DE (not submitted eventually)																																																
(b) Examination of issue at a national level by MS																																																
(c) Examination of the issue at EDA level on the basis of MS' feedback																																																
(d) 11th REACH Plenary meeting 22 November 2018: Decision to close issue and considered the sub-task as completed; focus actions henceforth on promotion of Reciprocal Acknowledgment (sub-task (b) under CoC)																																																
<b>(2) Harmonised approach on CLP defence exemptions (incl. Study Proposal 9.5.7)</b>																																																
(a) Investigate possible options (e.g. new CoC, updated existing CoC)																																																
(b) Identify common technical requirements for applying CLP Defence Exemptions																																																
<b>(e) EU-Transnational Use of REACH / Joint Defence Exemptions / Complex CoC Scenarios (incl. in Study Proposals 9.3.6 and 9.5.7)</b>																																																
(1) Establish a cooperative REACH defence exemptions' mechanism for transnational use of EDA REACH CoC (a) Develop and distribute to EDA REACH TF a related proposal, building on similar / existing EDA mechanisms (e.g. Ad Hoc Cat A and B programmes for R&D) (b) Examine and finalise potential mechanism																																																
(c) 10th REACH Plenary meeting 13-14 June 2018: Decision to stop work and re-commence at a later stage (Nov 2019); focus actions on promotion of Reciprocal Acknowledgment (sub-task (b) under CoC)																																																
(2) Approval and dissemination of mechanism to stakeholders																																																
<b>7. AMMUNITION CLASSIFICATION UNDER REACH (including Study Proposal 9.5.5)</b>																																																
(a) Ammunition Classification Stage 1 (Adoption of EDA MS Common Position on Ammunition Classification)																																																
(b) Assessment of Feedback from Stakeholders on Ammunition Classification Stage 1 Outcome (EDA MS Common Position on Ammunition Classification)																																																
(c) Ammunition Classification Stage 2																																																
<b>8. EU-LEVEL CLARIFICATION - ARE MoDs / ARMED FORCES REACH ADDRESSEES? (Study Proposal 9.3.5)</b>																																																
(a) Liaise with DG GROW to monitor the relevant progress of the CION legal services on the matter																																																
(b) CION Letter to EDA on the subject																																																
(c) Communicate the outcome of the CION legal position to MS																																																
(d) Examination of CION position by MS at national level																																																
(e) MS feedback to EDA/discussion at EDA level on MS positions																																																
<b>9. ALIGN PROCUREMENT CONTRACT TERMS WITH REACH (Study Proposal 9.5.3)</b>																																																
(a) Gather REACH-related national procurement practices																																																
(b) Liaise with industry on supply chain best practices																																																
(c) Prepare a proposal for an EDA sector-level recommendation on REACH related procurement requirements																																																
(d) Approval and dissemination of the EDA sector-level guidance on REACH related procurement requirements																																																
(e) EDA to monitor implementation of the EDA sector-level guidance by Member States at national level																																																
<b>10. AMMUNITION CLP LABELLING (Study Proposal 9.5.6)</b>																																																
(a) Review ASD paper of 09-5-2016																																																
(b) Gather national CLP labelling practices																																																
(c) Prepare a proposal for an EDA sector-level guidance on ammunition CLP labelling requirements with respect to REACH																																																
(d) Approval and dissemination of the EDA sector-level guidance on ammunition CLP labelling																																																
(e) EDA to monitor implementation of the EDA sector-level guidance by Member States at national level																																																
<b>11. REACH Art. 33 IMPLEMENTATION - COMMON APPROACH (Study Proposal 9.3.3)</b>																																																
(a) Disseminate the ASD "Sectoral Guidance for Substances in Articles under REACH" to EDA REACH TF																																																
(b) Review the ASD "Sectoral Guidance for Substances in Articles under REACH" - provide feedback to ASD and identify potential actions for EDA/MS																																																
(c) Monitor the evolution of the updated Waste Directive / ECHA Database issue and identify potential actions for EDA/MS																																																
<b>12. CLARIFY REACH LINKS WITH OTHER EU LAWS AND POLICIES (Study Proposal 9.2.3)</b>																																																
<b>(a) REACH and Circular Economy</b>																																																
<b>(b) Study on Consistency of EU Chemicals' / Products' Laws Impacting Defence (Study Proposal 9.2.2)</b>																																																
(1) Preparation of the tender specifications																																																
(2) Launch tender - award contract - implement Study																																																
<b>13. FIT-FOR-PURPOSE (F4P) MILITARY APPLICATIONS FOR AUTHORISATION (AFAs) (Study Proposal 9.3.1)</b>																																																
(a) Liaise with ECHA																																																
(b) Liaise with industry																																																
(c) Development of a military AFA guidance document (if required based on developments)																																																

Blue	Generic / Continuous Task
Light Blue	Generic / Continuous Sub-Task
Green	Specific Task / Project
Light Green	Specific Task / Project Sub-Task
Dark Green	Specific Task / Project Sub-Task Action
Grey	Specific Task / Project Sub-Task Sub-Action