

EDA Roadmap 2021-2023 for REACH and related Chemicals/Waste Regulations

Gantt Chart

TASK NAME	2021												2022												2023												
	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	
(d) EC CLP Revision 2021																																					
(1) Develop/agree at technical level, with support from pMS experts and in consultation with EC and industry, a proposal for a contribution to the open public consultation on the CLP Revision 2021 (with a focus on CLP labelling of ammunition) to be used by pMS as an input to their contribution at national level, if needed																																					
4. EDA CODE OF CONDUCT ON REACH DEFENCE EXEMPTIONS																																					
(a) Harmonisation of REACH Defence Exemptions																																					
(1) Monitor progress of harmonisation/EDA CoC implementation at national EDA sMS level																																					
(2) Maintain/Update EDA REACH Portal on the basis of inputs from EDA sMS																																					
(b) Promotion / Implementation of reciprocal acknowledgement of REACH Defence Exemption decisions, among EDA sMS																																					
(1) Monitor EDA sMS actions on incorporating reciprocal acknowledgement provisions on their national REACH defence exemptions procedures, and provide support to EDA sMS, if requested																																					
(2) Share/disseminate EDA sMS best practices on reciprocal acknowledgement of REACH defence exemptions																																					
(3) Update the initial mapping of EDA sMS provisions on reciprocal acknowledgement of national REACH defence exemptions																																					
(c) Transparency of REACH Art. 2(3) Procedures and Decisions																																					
(1) (Internal and External Transparency between EDA pMS) Approve technical-level proposals on information to be disclosed on defence exemptions decisions, at EDA pMS level																																					
(2) (Internal and External Transparency between EDA pMS) Implement/liaise with EDA pMS to gather the agreed information - Analyse EDA pMS' approaches (especially when same substances have been exempted)																																					
(3) (Internal and External Transparency between EDA pMS) Populate the ECP (internal transparency) and the EDA Portal (external transparency), based on pMS information received																																					
5. COMMON/HARMONISED IMPLEMENTATION APPROACH																																					
(a) Align procurement contract terms with REACH / Monitor implementation of the EDA document/Recommendations on "Alignment of pMS' Procurement Contracts with REACH" by EDA pMS at national level, taking also industry's input into account, as necessary																																					
(1) Seek periodic feedback on any changes/improvement (for those EDA pMS that mapping on degree of EDA pMS procedures' alignment to EDA Recommendations will show not fully aligned)																																					
(2) Update the initial mapping on degree of EDA pMS procedures' alignment to EDA Recommendations																																					
(3) Gather pMS' inputs on other topics of interest and elaborate further on other relevant topics related to REACH/procurement of interest to pMS (e.g. REACH and FMS)																																					
(b) REACH Art. 33 implementation / Common/Harmonised Implementation Approach																																					
(1) Work towards a harmonised practical implementation of REACH Article 33 by EDA pMS																																					
(2) Monitor further developments in interactions/exchange between the Commission, ECHA and industry on the implementation of the REACH Art. 33 requirements, so as to take into account in further work on this activity																																					
(c) Exchange of pMS Views on their Roles under REACH - If MoDs/Armed Forces are REACH Addressees																																					
(1) Facilitate exchange of view between pMS, taking into account also potential views expressed by EC																																					
(d) REACH/CLP and US ITAR																																					
(1) Share experiences/potential challenges, best practices, lessons learned between pMS experts, in this area, also on the basis of a possible information to be received on this issue, through the informal technical exchange between EDA and US DoD/AIA on REACH																																					
6. AMMUNITION CLASSIFICATION UNDER REACH																																					
(a) Develop a technical proposal for a updated EDA pMS Common position																																					
(b) Adoption of updated EDA pMS Common Position on Ammunition Classification by EDA pMS and NO																																					
(c) Monitoring and assessment of Feedback from Stakeholders on the updated EDA pMS Common Position																																					

