

EDA Roadmap 2021-2023 for REACH and related EU 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																														
(2) Monitor progress of CLP Revision process, in consultation with defence industry and EC																																																																		
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																																																																		
(1) Develop/agree at technical level, on a high-level document text for a Code of Conduct on CLP Defence Exemptions																																																																		
(b) Adoption of updated EDA pMS Common Position on Ammunition Classification by EDA pMS and NO																																																																		
(1) Develop/agree at technical level, on a high-level document text for a Code of Conduct on CLP Defence Exemptions																																																																		
(c) Monitoring and assessment of Feedback from Stakeholders on the updated EDA pMS Common Position																																																																		
(1) Develop/agree at technical level, on a high-level document text for a Code of Conduct on CLP Defence Exemptions																																																																		
7. EDA CODE OF CONDUCT ON CLP DEFENCE EXEMPTIONS																																																																		
(a) Harmonised approach on CLP Defence Exemptions																																																																		
(1) Develop/agree at technical level, on a high-level document text for a Code of Conduct on CLP Defence Exemptions																																																																		
(2) Approve EDA CoC on CLP Defence Exemptions at EDA pMS level																																																																		
(3) sMS Subscription to the EDA CoC on CLP Defence Exemptions																																																																		

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11. BPR, POPs, ODS, F-GAS, RoHS IMPLEMENTATION																																				
(a) Monitor the evolution of the BPR, POPs, ODS, F-GAS, RoHS related issue at EU level and share information on the impact identified by EDA pMS	[Continuously implemented]																																			
(b) Examine/Review EDA Study outcome/proposals with TF experts and decide on follow-up activities	[Specifically implemented]																																			
(c) Exchange of information on procurement requirements at national level	[Continuously implemented]																																			
(1) Conduct an initial mapping of RoHS and F-Gas related procurement requirements	[Specifically implemented]																																			
(d) Other activities following the EDA 2020 study*	[Continuously implemented]																																			
12. SUBSTANCE/AREA-SPECIFIC ISSUES																																				
(a) Use of PFAS in military applications (e.g. firefighting foams, textiles, lubricants)	[Continuously implemented]																																			
(1) Monitoring of regulatory evolution at international and EU level and developments of PFAS-free alternatives	[Continuously implemented]																																			
(2) Formation of a PFAS Sub-Working Group	[Specifically implemented]																																			
(3) Contribute to the restriction process on PFAS in Fire-Fighting Foams by providing feedback from the EU defence sector to EC and ECHA	[Continuously implemented]																																			
(4) Conduct a mapping on pMS/Armed Forces uses of PFAS, seeking also input from industry	[Continuously implemented]																																			
(5) Identify/mitigate potential impacts to MoDs by contributing to EU-level process/debates	[Continuously implemented]																																			
(6) Promote cooperative pMS activities for R&T innovative substitution	[Continuously implemented]																																			
(b) Lead in Ammunition/Military uses	[Continuously implemented]																																			
(1) Monitoring of regulatory evolution at EU level and developments of lead-free alternatives at international level	[Continuously implemented]																																			
(2) Conduct a mapping on pMS/Armed Forces uses of Lead in Ammunition, seeking also input from industry	[Continuously implemented]																																			
(3) Identify/mitigate potential impacts to MoDs by contributing to EU-level process/debates	[Continuously implemented]																																			
(4) Promote cooperative pMS activities fro R&T innovative substitution, incl. through funding at EU level	[Continuously implemented]																																			
(c) Other Ammunition-related REACH/CLP implementation issues	[Continuously implemented]																																			
(1) Discuss and exchange views on the various scenarios of ammunition-related authorisations / defence exemptions, on the basis of consolidated pMS inputs	[Continuously implemented]																																			
(2) Discuss and exchange views on the obligation to notify to CLP Poison Centre Notification for ammunition/explosives	[Continuously implemented]																																			

[Light Blue]	CONTINUOUS Task / Sub-Task / Sub-Task Action under implementation/in progress
[Light Green]	SPECIFIC Task / Sub-Task / Sub-Task Action under implementation/in progress
[Yellow]	Specific Task/Sub-Task previously COMPLETED/CONCLUDED
[Diamond]	Meeting Conducted
[Red Diamond]	Specific Milestone/Event

* To be elaborated in a next revised version of the EDA Roadmap.