

EDA Study on REACH and CLP Impact on the Defence Sector



totojang1977 @ shutterstock

Why a dedicated REACH defence study – EDA's role

The European defence sector is fundamentally shaped by a combination of characteristics relating to the manufacture, import or through life use of highly sophisticated performance-driven systems, supported by complex multi-tier, international product supply chains. REACH and CLP Regulations (and the processes involved e.g. authorisation, restrictions) may have a significant impact on European defence capabilities during the whole life cycle of defence equipment (design, manufacturing, in-service use and maintenance, disposal) and therefore on the European Defence Technological and Industrial Base (EDTIB).

In recent years, EDA has assumed a facilitator's role as military coordinator of REACH defence related issues, supported by all stakeholders (Member States, Commission, ECHA and the Defence Industry).

Why a study now

The European Commission review of the REACH regulation and its processes is taking place in 2017.

Study principles

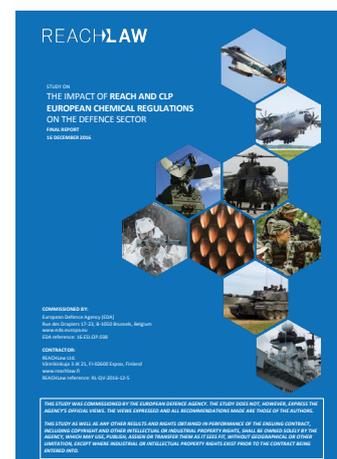
Through the study, EDA intended to serve two principles: a) high level of health and environmental protection and b) operational effectiveness of Member States' Armed Forces, including through enhancing the competitiveness and innovation of the European Defence Technological and Industrial Base (EDTIB).

Main study elements - objectives

1. Impact analysis of REACH and CLP on EU defence sector, both industry and governments.
2. Practical proposals on improvements for REACH and CLP and their current implementation regime, to serve as a basis for EDA, and its participating Member States' (pMS), input to the EC for the 2017 REACH review and as suggestions for REACH evolutions beyond 2018.

Wide study consultation

During the study consultation, input from a wide range of stakeholders was gathered from over 100 organisations in 20 EU Member States and the United States (US). Key stakeholders consulted included EU Member States' MoDs, the EC (DG GROW and DG ENV), ECHA, Member States' Competent Authorities on REACH and CLP, and EU defence industry including ASD, NDIAs and REACH Consortia, as well as major non-EU/US companies.



[EDA REACH Study Final Report](#)

Study report findings - proposals

The study report concluded in December 2016 and related REACH impact assessment identified total 21 findings, leading to main conclusion :

REACH and its processes, as they stand now, may impact the actual operability of Member States' Armed Forces, especially considering the long lifecycles of military equipment.

Thus, the study provided key recommendations for further actions by competent stakeholders. A total of 26 improvement proposals (not only defence-specific but also general) were identified, 14 of which related to the EC REACH Review 2017, for the improvement of REACH and its current implementation regime, while the remainder are addressed to defence sector stakeholders.

The EDA submitted the study report to the Commission as input to 2017 REACH review, and informed all other competent stakeholders (Member States' MoDs, ECHA and the defence industry) on the outcome of the study. The study was also made publicly available on the EDA website.

The Agency is now in the process to further liaise with all stakeholders to support further examination and implementation of the study proposals.

More information available on the EDA REACH [project page](#).

Last update: 17 March 2017