

Review of ECHA's Strategy 2019-2023

61st Meeting of the Management Board 25 March 2021

Proposal

The Management Board (MB) is invited to

- Discuss the purpose and ambition level of the review of ECHA's Strategy 2019-2023
- Review the proposed approach and timeline
- Establish the strategy review ad hoc MB subgroup and
- Agree to conduct the review on this basis.

The MB Subgroup Strategy, Planning and Implementation (SG SPI) reviewed the proposal during its meeting of 2 March 2021 and expressed its support to conducting the review and the proposed ambition level. The input received has been reflected in the updated proposal.

Background

The Management Board decided to initiate the mid-term review of ECHA's Strategy 2019-2023 in December 2020. The main drivers of this decision were to account for the significant evolution of ECHA's organisational and policy context and to take stock of the strategy implementation so far.

Since the development of the Strategy in 2017-18, ECHA's mandate has evolved and significant new policy initiatives have been launched by the Commission (e.g. Green Deal and Chemicals Strategy for Sustainability), with corresponding expectations expressed by the European Parliament and Member States. The EU's multi-annual financing until 2027 was established and the "new normal" caused by the pandemic will influence the way ECHA works and interacts with its partners in the future. These developments are already present in ECHA's business and will continue to influence ECHA's operating context. They bring new and different opportunities as well as challenges to address, meriting a deeper review and possibly substantial adjustments to the current Strategy.

The first two years of implementing the Strategy have brought learnings about the progress in meeting the three strategic priorities and in meeting ECHA's vision. More insight has also been gathered about the needs for developing ECHA's enablers. ECHA has faced challenges in implementation and has to address these by re-prioritisation of activities and resourcing for the Work Programme 2021.

Proposal and rationale

Proposed ambition level

The strategy review would have the ambition to realign the Strategy with the changed policy and organisational context, to clarify to what extent the strategic objectives are still valid and to confirm the direction for implementation, with a view to the timeframe of the upcoming Programming Document 2022-25.

The main goals of the review could be:

- 1) To review the *progress* in implementing the strategy to date and take stock of the progress towards achieving expected outcomes

- 2) To develop an updated view on ECHA's *evolving role within the institutional context*
 - Clarify ECHA's contribution towards Union and Member States objectives
 - Clarify scope and boundaries of ECHA's role, with respect to EU and Member State policy and objectives
- 3) To offer a high level view on *how ECHA could work* and its implications on the Agency's development
- 4) To *identify if changes are required to the current strategic priorities* and to update or amend objectives and the Strategy as appropriate
- 5) To provide *steer and direction on how ECHA should implement the revised Strategy* in order to provide clarity for staff, duty holders, regulatory partners and stakeholders on how the Agency will implement its mission and work towards its vision.

Proposed timeline

The proposed timeline is based on the goal to adopt the updated Strategy in December 2021, in time for inclusion in the Programming Document 2022-25, as its multi-annual part, with the possible option to discuss it as part of the orientation debate for the PD (*in grey below*). The draft milestones and high-level activities are:

March	April	May	June	July	August	September	October	November	December
Agree approach and ad hoc MB group			MB workshop			MB review (and orientation debate)		MB SG SPI review	MB adoption of updated strategy (as part of PD)
		MB and stakeholder consultation on key questions			MB consultation on draft and discussion at orientation debate		<i>Draft consulted as part of PD (TBC)</i>		
Analysis: strategy progress, context Scoping of exercise: key questions			Draft strategy			<i>Draft included in PD (TBC)</i>	Updated draft		

Proposed working method

The strategy review could be conducted by a dedicated ad hoc subgroup of MB members, under the leadership of the MB Chair and with the support of the Secretariat, within a proposed timeframe of ca. 9 months.

The ad hoc subgroup is proposed to:

- Be of advisory nature = not taking decisions but formulating proposals and recommendations for the full MB
- Steer the review process, as well as the consultations and the content-work
- Be composed of MB members who
 - Have previous experience in strategy development and/or strategy review at organisational level
 - Are current members, incoming members (if known and in an advisory role) and outgoing members who are able to stay on in an advisory role until the end of the process

- Reflect and balance the composition of the full MB and, where possible, provide balance across all legal mandates of ECHA
- Have a strong interest and commitment to investing significant time and effort in the exercise. A high number of meetings (ca. 2 per month) and document review is foreseen
- Be of a size which allows for effective and efficient functioning (up to ca 10-12 members).

The secretariat will, under the leadership of the Executive Director, support the MB and in particular the Chair and the ad hoc subgroup with coordination, practical arrangements, data collection and drafting, as required. The steer and guidance would come from Board members, with the objective of avoiding an inside-out approach, driven by proposals from the Secretariat.

In such a setting, the value of the exercise would come not only from the updated Strategy, as end product, but also from the process itself. The review would be an inclusive opportunity for dialogue between Board members, the Executive Director, ECHA's stakeholders, in particular Member States, Commission, European Parliament and interested parties. The aim is to have a dialogue about stakeholders' expectations and ECHA's contribution to EU and Member State policy objectives. The relatively wide consultation reflects the fact that ECHA implements its Strategy and Work Programme together with its stakeholders and is not able to deliver on it in isolation.

Proposed steps for conducting the review

- The ad hoc subgroup sets the framework to take stock of the existing Strategy, to analyse the status of its progress.
- On the basis of this analysis, the ad hoc group designs the key questions to be addressed in the review exercise and the process for gathering input. The MB provides steer to the ad hoc subgroup.
- Next to MB members, ECHA's regulatory partners and stakeholders provide structured input to the review. Board members play an active role in gathering input, in particular from their Member States and/or respective sectors of interest.
- The ad hoc subgroup analyses the input received and prepares a draft revised Strategy, if appropriate.
- The MB discusses the revised draft Strategy and provides steer for its further development.
- The ad hoc subgroup prepares the final draft of the revised Strategy, for discussion and possible adoption by the MB.

Alternative options

Alternative options have been considered and are reported here with their merits and drawbacks.

- 1) Longer timeframe: a full strategy exercise - like the one done to develop the current strategy - would provide opportunity for a more thorough strategic analysis and broader public engagement. This exercise would become longer, extending e.g. until the autumn of 2022. This would reduce the benefit of providing steer in the years 2021-23, where de facto we would have the current Strategy still in force. It may also trigger a duplication of work, since the Multi-Annual Work Programme 2022-25 may need to be updated anyway, to account for changes for the recent context.
- 2) Lighter exercise: a desk review update of the current Strategy could be carried out with reduced ambition level, aiming at focused edits of the aspects of the current Strategy that have less relevance in the current context. This exercise could be carried out with reduced effort. It would provide more continuity with the current direction, while missing key benefits of the proposed approach, including the opportunity for strategic reflections and direction setting at Board level.

Drawbacks

The apparent drawback of the proposal is its timing and the required effort. In terms of timing, uncertainties remain as to ECHA's role and, to some extent, resourcing in the implementation of the Chemical Strategy for Sustainability, which may prove to be challenging to account for in the Strategy review. This may be mitigated by close and on-going dialogue with the Commission and relevant stakeholders. In terms of effort, the review will require significant investment of time and work of MB members, which is balanced by the fact that the outcome of the work will guide ECHA's activities for the foreseeable future. The review of the Strategy is a key deliverable of the MB for 2021 and as such, the required investment will be balanced by the benefit of a robust Strategy.

Attachments:

- Annex: Strategic Plan 2019-2023 (please refer to the multiannual section of [ECHA's Programming Document 2021-2024](#), pages 18-25)
- Proposed composition of the ad hoc strategy group [available after 24 March 2021]

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