

Brussels, June 2025

Endorsing Regulatory Coherence for a Ready and Resilient Europe

BeST Reaction to the Defence Readiness Omnibus

The Beryllium Science and Technology Association (BeST), representing EU-based manufacturers, suppliers and users of beryllium, welcomes the European Commission's Defence Readiness Omnibus. We fully endorse its aim to align EU regulations with the strategic objective of strengthening the European Defence Technological and Industrial Base. This initiative comes at a crucial time and marks a meaningful step toward greater regulatory consistency, reduced complexity, and stronger investment in essential defence capabilities. The production of beryllium for defence, space, and military purposes is closely linked to its commercial applications. Revenues from commercial use help offset the costs of producing beryllium for these critical sectors. Consequently, policy measures that limit beryllium's use in commercial markets could jeopardize the material's availability for defence and related industries.

Beryllium is recognised by the EU as a critical raw material, by *U.S. Department of Defense* as strategical and critical and finally is also acknowledged by NATO because of its indispensable role in high-tech applications. Its unique properties make it vital, and often irreplaceable, in a wide range of advanced systems.

On Regulatory Coherence

BeST supports the *Defence Readiness Omnibus* for highlighting how fragmented and inconsistent regulations, particularly in the areas of chemical and environmental policy, can hinder defence readiness. This concern echoes [standing positions](#) expressed by BeST, where we have consistently called for more coherent and predictable regulatory frameworks to ensure the resilience of the European defence sector.

We especially welcome the focus on the REACH regulation and the recognition of its current limitations in assessing the broader impacts of substance restrictions. Addressing these shortcomings is essential to balancing environmental and health objectives with the strategic needs of Europe's defence and industrial capabilities and also giving this and other industries reliable long term certainty in use, production and design.

Supporting a Strategic and Balanced Approach: Key Recommendations

To ensure that the EU achieves the goals set out in the Defence Readiness Omnibus, we propose the following priorities:

- **Ensure Strategic Focus on Critical Substances:** Regulatory action must safeguard substances vital to national and European security. Their irreplaceability in defence and key sectors must be a core consideration.

- **Systematically Integrate Defence Considerations into Chemicals Policy:** Defence objectives must be embedded in REACH and related frameworks. Restrictions should not proceed without assessing impacts on security capabilities.
- **Institutionalize Early and Structured Dialogue with Industry:** Structured engagement with industry must begin at the earliest stages. Policymakers need technical input to craft effective, realistic regulations.

Conclusion

BeST welcomes the European Commission's proposal to enhance Europe's defence readiness by addressing the regulatory challenges that impact the availability and use of critical raw materials like beryllium. A more coherent, simplified, and defence-aware regulatory framework is essential for safeguarding Europe's technological sovereignty and industrial resilience. We stand ready to contribute our technical expertise and support efforts to implement these reforms effectively and pragmatically.

About BeST

The Beryllium Science and Technology Association (BeST) represents the manufacturers, suppliers and users of beryllium metal, beryllium containing alloys and beryllium oxide ceramics in the EU market. BeST has the objective of promoting sound policies, regulations, science and actions related to the safe use of beryllium and to serve as an expert resource for the international community on the benefits and criticality of beryllium applications. It is also the objective of BeST to promote good practices in the workplace to protect workers handling beryllium containing materials.
