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2025-07-16	25FMV4377-2	1.1
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	1.0E	1(5)

Instruction for Contractor's Environmental Management Plan

Purpose with this instruction

If requirements for an environmental plan are included in the contract, this instruction can be applied. This document serves as a support document for contractors. It describes the expected scope of information in an environmental plan as well as a suggested structure. The purpose of establishing an environmental plan within the framework of a contract with FMV is for the contractor to plan, follow up, and have a basis for engaging in dialogue with FMV regarding environmental work during the contract period.

Rationale for FMV requiring an environmental plan

FMV shall deliver materials and services with consideration given to environmental and sustainability aspects from a life cycle perspective. Therefore, it is important for FMV that the contractor can demonstrate how they work to comply with existing chemical and environmental legislation as well as FMV's own environmental requirements. The development of the EU's work in the environmental and sustainability area, along with associated regulations, requires that FMV's contractors have a strong ability to anticipate the measures needed to ensure long-term functionality of materials and services.

Resource efficiency, including circular material flows, reduced use of hazardous chemical substances, and energy consumption are examples of important aspects to consider. These aspects also impact security of supply and operational capability.

The environmental plan shall describe how environmental work or the environmental management system will be applied in the contractor's commitment to FMV and which activities will be carried out to ensure and verify that legal requirements as well as FMV's environmental requirements are met. Information to be included in the environmental plan, in relation to the contract, includes how the environmental work is organized, environmental competence, how environmental aspects are handled during design, procurement, and manufacturing, work with product selection, and other environment-related activities.

Prior to developing the environmental plan, the contractor shall have reviewed:

- FMV's sustainability policy
- The Defence sector's criteria document – chemical substances, chemical products and articles

These documents can be found on www.fmv.se.

FMV's requirements for the format and content of the environmental management plan

This section describes how an environmental plan can be structured and what content shall be included. The environmental plan may refer to information in other parts of the project documentation, such as the contractor's project plan, if deemed appropriate. If so, references shall be included showing which other documents address the information requirements below and which procurement requirement they fulfill. The environmental plan and included references are evaluated against the scope of information FMV has required in the specific procurement.

During the contract period, results from environmental activities carried out by the contractor may necessitate updating the environmental plan to reflect the current status of the environmental work. The plan shall then be issued as a new version according to requirements or by agreement between FMV and the contractor.

If FMV has required the contractor to work with social responsibility, the environmental plan may, by agreement with FMV, be expanded into a sustainability plan by also including information on the contractor's work in this area. The contractor shall then, for example, report identified risks of poor working conditions in the supply chain, traceability in the supply chain, how social requirements are flown down to subcontractors, plans for follow-up in the supply chain, and handling of any deviations.

Heading structure

The following heading structure is a suggestion for how an environmental plan can be structured and what information should be included in a complete environmental plan. The structure corresponds to the points (a–h) specified in FMV's standard requirements for an environmental plan. Where applicable, other points may also be included in the environmental plan depending on the nature of the procurement. Therefore, the environmental plan shall be prepared according to the requirements in the relevant contract.

Depending on the nature of the procurement, certain requested information may be irrelevant, and if such information is omitted, the contractor must provide justification. It may also be relevant for the contractor to supplement the environmental plan with additional headings depending on the environmental requirements specified in the particular procurement. For example, if requirements have been set regarding chemicals, traceability reporting, and information on the origin of raw materials—such as strategic and critical raw materials, conflict minerals, or rubber—activities to comply with these requirements may be included in the plan as needed.



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Purpose and status

This section briefly outlines the purpose, scope, any limitations/delimitations, and update procedures of the environmental management plan.

Status and revision control may be presented in a table format. See the example below:

Version	Date	Status	Change	Version Created By	Version Approved By
<i>V. 1.0</i>	<i>2025-xx-xx</i>	<i>Draft/ Approved</i>	<i>Specify version amendment</i>	<i>Name, Role</i>	<i>Name, Role</i>

Organization

This section may describe roles and responsibilities for activities within the environmental plan. Specify the roles/positions that have areas of responsibility or accountability for activities relevant to the environmental plan. To facilitate dialogue regarding environmental work during the contract, it may also be appropriate to provide contact persons with their contact details.

Environmental Work Within the Contract

Environmental Requirements in the Contract

Account for the environmental requirements that shall be met under the contract, how compliance will be reported, and the status of related activities. This can be displayed in table format:

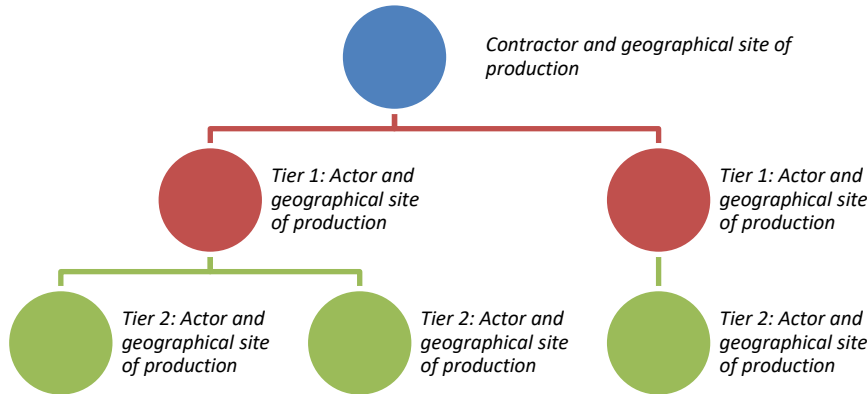
Requirement No.	Requirement text	Documentation	Activity Status
<i>VAS_XYZ</i>	<i>Restriction of SVHC</i>	<i>Information provided through... Documentation in Annex A</i>	<i>Ongoing</i>

Legal Compliance and Trends

This section should appropriately present the contractor's work with legal compliance as well as legal and external monitoring in the trends of environment, chemicals, and sustainability. The purpose of the information is to demonstrate to FMV that relevant legal provisions have been identified and are being complied with, and that monitoring of regulatory developments that may affect the subject of the contract is being conducted. Relevant legal provisions to be considered within the framework of the contract may be listed in bullet points, for example REACH (EC No 1907/2006), the F-gas Regulation (SFS 2016:1128), etc.

Supply Chain

Provide an overview of the supply chain related to the subject of the contract. The number of tiers to be reported is defined in the requirements or agreed upon between FMV and the contractor. The reporting can, for example, be done according to the schematic diagram below. If the contractor is undertaking work to improve traceability in the supply chain, this work should be described in a few sentences.



Climate work

The contractor shall report whether the company has adopted a plan to reduce climate impact in production in line with the Paris Agreement, both within its own operations and throughout its supply chain. For a contractor reporting in accordance with the European Commission’s Delegated Regulation (EU) 2023/2772, the disclosure item ESRS E1 – Climate Change may be used as a basis. Focus should be placed on ESRS E1-1 and ESRS E1-9.

Activities shall, where possible, be linked to the contract; otherwise, they can be presented from a company-wide perspective.

The contractor shall, regardless of whether they report in accordance with the ESRS, disclose, if applicable, any of the following:

- A transition plan to achieve climate neutrality by 2050 (corresponding to ESRS E1-1)
- A forward-looking analysis of how climate change affects the production facilities in the supply chain and how those facilities, in turn, impact the climate (corresponding to ESRS E1-9)
- A plan to reduce climate impact in production, covering both the supplier’s own operations and the supply chain.

This may include, for example, energy efficiency measures, increased use of fossil-free energy, and reduction of emissions.

Closing-the-loop and circular economy

The contractor shall report whether the company is working towards closing the resource loop. For a contractor reporting in accordance with the European Commission’s Delegated Regulation (EU) 2023/2772, the disclosure item ESRS E5 – Resource Use and Circular Economy may be used as a basis.

Activities shall, where possible, be linked to the contract; otherwise, they may be presented from a company-wide perspective.

The contractor should also disclose any available information regarding:

- whether the system is designed to enable lifetime extension, and



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- whether the use of recycled materials is deemed feasible, *i.e.* whether suitable quality recycled materials are available on the market for use in any part of the system.

Biodiversity

The contractor shall disclose whether the company takes biodiversity into account in its operations. For contractors reporting in accordance with the European Commission's Delegated Regulation (EU) 2023/2772, the reporting item ESRS E4 – Biodiversity and Ecosystems may be used as a basis.

Activities shall, where possible, be linked to the contract; otherwise, they may be presented from a company-wide perspective.

The contractor should also disclose any information regarding:

- whether the supplier has a plan to reduce its negative impact on its own operations and/or within the supply chain (ESRS E4-1)
- whether items under the contract fall within the scope of the Deforestation Regulation (EU) 2023/1115, and information about due diligence and traceability according to the regulation.