

UK REACH Info Leaflet

Last updated in July 2024

UK REACH

The EU REACH Regulation has been brought into UK law under the European Union (Withdrawal) Act 2018. REACH, and related legislation, has been replicated in the UK with the necessary changes to make it operable in a domestic context. The key principles of the EU REACH Regulation have been retained. The EU REACH Regulation was brought into UK law on 1 January 2021. This is known as UK REACH.

UK REACH and the EU REACH regulations operate independently from each other. Companies that are supplying and purchasing substances, mixtures or articles to and from the EU/EEA/Northern Ireland and Great Britain (England, Scotland and Wales) will need to ensure that the relevant duties are met under both pieces of legislation. Under the Northern Ireland Protocol the EU REACH Regulation continues to apply to Northern Ireland, while UK REACH provides the regulatory framework for chemicals in Great Britain (GB).

EU held registration: UK Downstream Users

UK Downstream Users (who do not hold an EU REACH registration) importing chemicals from an EU/EEA country need to ensure the substances they purchase are covered by a valid UK REACH registration. These UK Downstream Users must notify the UK Agency HSE (Healthy and Safety Executive) using a **Downstream User Import Notification (DUIN)** of their intention to continue importing substances from the EU/EEA by 27 October 2021. A new registration must then be submitted to the HSE within 2, 4 or 6 years of 28 October 2021, depending on the registration tonnage band and hazard profile of the substance. Alternatively, UK Downstream Users can encourage their EU/EEA supplier to appoint a GB-based Only Representative (OR), or change their source to a GB registered supplier.

News:

Extension of submission deadlines: UK Defra (Department for Environment Food & Rural Affairs) has committed to exploring alternative arrangements for transitional registrations including extending deadlines to provide full registration data. To facilitate this, the current deadlines have been extended by 3 years to **27 October 2026, 27 October 2028 and 27 October 2030** depending on tonnage and toxicity of the substances.

Late DUIN: Currently a late DUIN is still possible, which should be done as soon as possible if eligible to do so.

How can we help to get you started under UK REACH?

- ✓ Check whether your substance could be exempted from the registration under UK REACH; and
- ✓ Check whether registration transitional provisions are possible: (late) DUIN or new registration; and
- ✓ (late) DUIN submission to HSE; and
- ✓ Inquiry submission prior to full registration to HSE if a new registration is required.

(late) DUIN is possible – Action!!!

If you (non-GB based company who holds an EU REACH registration) have or will have business in GB, we will gladly provide advice and support for gathering all relevant data for a quickest (late) DUIN. Our recommendation:

- ✓ List all substances that you will export to GB; and
- ✓ Calculate the registration tonnage band based on your current (potential) business; and
- ✓ Prepare for the data/information which is required for a (late) DUIN, maybe working with your EU-based OR together, e.g. substance identification data etc.; and
- ✓ Enrich your knowledge on UK REACH; and
- ✓ Communication in the supply chain (direct and indirect export into GB).

GEELIO UK REACH Consulting Service

We offer services in all areas covered by UK REACH for the clients placing their chemical products on the GB market, e.g.

- ✓ OR service together with our partner's legal entity in GB (takeover of OR function and basic substance coverage etc.);
- ✓ (late) DUIN submission;
- ✓ Full registration support (Co-registration service / Lead registration service);
- ✓ Negotiation with data owner for legal data access (Letter of Access) for the purpose for UK REACH registration;
- ✓ Developing a regulatory strategy, incl. testing strategy for UK REACH registration (in case that a substance would also be registered under EU REACH and/or China REACH and some new testing is required, a testing strategy would be developed based on the requirements of the relevant regulations);
- ✓ Study monitoring incl. support in reviewing study plan and study report; and more...

We are looking forward to answering your questions and ensure that we are helpful in every possible way.

If you have questions feel free to contact:

GEELIO Umwelttechnologie GmbH, REACH & CLP TEAM

Phone: +49-6735-37599 50

Email: reach@geelio.com

www.geelio.com