

UK chemicals regulations: Challenges and Moving Forward

Q&A

#	Question	Answer
1	What is the major challenge to UK REACH for now?	LR selection and the LOA cost are the main challenges. LR selections are still ongoing and LOA cost will depend on LR selection. LOA cost is the major worry for many manufacturers, it is duplication of the LOA cost under UK REACH. Discussion for these major challenges is still ongoing among the authorities.
2	Does Pesticides or Plant protection product be registered in EU REACH or UK REACH?	There are specific compliances and regulations that are applicable for pesticides and plant protection products, but we need more details on these substances to know if other regulations and compliance should be applied.
3	Any recent news on the extension of the deadline?	DEFRA consultation programs are ongoing to check on the possible extensions. Much information is expected in the coming months as the consultation programs are to be held till September.
4	Are OR transfers possible for DUIN notified substances?	Actually no, as the portal is in developing stage hence though it is possible for registered substances, but for DUIN notified substances there is no clear answer from the authority.
5	What is the output of public consultation held by UK for extension of deadlines?	The public consultation is ongoing to check on the possible extensions, so the output of it is yet awaited. Much information is expected in the coming months as the consultation is to be held till September.
6	Is it important to track the volumes of a substance sold into the UK from the point of view of post DUIN registrations? Which years data is usually reviewed, only year of registration or the previous year or from the year the UK REACH came into place to calculate the volumes sold?	It is very important to track the volumes of substances that you are exporting to the UK since it will vary the registration deadline. When it comes to calculating the volumes of DUIN notified substances, please track the volume of the substance from the first day of your export to the UK.
7	Can a DUIN notified non-GB manufacturer sell the substance to as many GB based DUs?	DUIN notified substances can be only sold to existing supply chain to whom the substances were exported during 2019 to 2020. Not for the new importers or downstream users but existing ones. If there's a new supply chain, it requires another compliance.
8	Registration deadlines for substances whose DUIN already	Please find below table for different deadlines.

	done?	<p>UK REACH tonnage bands and hazard profiles</p> <table border="1"> <thead> <tr> <th data-bbox="676 286 887 349">Deadline (last date for dossier submission)</th> <th data-bbox="887 286 1035 349">Tonnage</th> <th data-bbox="1035 286 1385 349">Hazardous property</th> </tr> </thead> <tbody> <tr> <td data-bbox="676 349 887 544">27 October 2023</td> <td data-bbox="887 349 1035 544">1000 tonnes or more per year</td> <td data-bbox="1035 349 1385 544"> <ul style="list-style-type: none"> ▪ Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year ▪ Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year ▪ Candidate list substances (as at 31 December 2020) </td> </tr> <tr> <td data-bbox="676 544 887 607">27 October 2025</td> <td data-bbox="887 544 1035 607">100 tonnes or more per year</td> <td data-bbox="1035 544 1385 607">Candidate list substances (as at 27 October 2023)</td> </tr> <tr> <td data-bbox="676 607 887 669">27 October 2027</td> <td data-bbox="887 607 1035 669">1 tonne or more per year</td> <td data-bbox="1035 607 1385 669"></td> </tr> </tbody> </table>	Deadline (last date for dossier submission)	Tonnage	Hazardous property	27 October 2023	1000 tonnes or more per year	<ul style="list-style-type: none"> ▪ Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year ▪ Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year ▪ Candidate list substances (as at 31 December 2020) 	27 October 2025	100 tonnes or more per year	Candidate list substances (as at 27 October 2023)	27 October 2027	1 tonne or more per year	
Deadline (last date for dossier submission)	Tonnage	Hazardous property												
27 October 2023	1000 tonnes or more per year	<ul style="list-style-type: none"> ▪ Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year ▪ Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year ▪ Candidate list substances (as at 31 December 2020) 												
27 October 2025	100 tonnes or more per year	Candidate list substances (as at 27 October 2023)												
27 October 2027	1 tonne or more per year													
9	For non-DUIN substances, procedure for Registration and due dates for Registration?	<p>For non-DUIN substances, the chemical should be checked if it is already existing under UK REACH or is a new chemical. Based on the case, either New registration of existing substance (NRES) or full registration before exports may be applicable.</p> <p>The process must be completed before the export happens to the GB market. Since NRES is the partial compliance activity, complete registration should be done within the deadline as indicated below, while for full registration process, all activities of registration need to be completed before export to the GB market.</p>												
10	Is there a strategy to minimize the UK REACH registration costs (including the LoA) ?	<p>Defra has been committed to exploring alternative arrangements for UK REACH transitional registrations in order to support chemical businesses. The government was engaged with industry and other stakeholders to explore whether there are opportunities to reduce the need for industry to replicate existing EU REACH data by placing a greater emphasis on understanding how chemicals are used in GB. With this in mind, Defra had initiated a consultation programme between 5th July, 2022 till 1st September 2022 to know opinions on the extension of current deadlines thereby taking into discussion the duplication of the cost factor. Now that this deadline is closed, more information from the authority is awaited.</p>												