



## WHAT IS UK REACH?

The EU REACH Regulation was brought into UK law, **as amended by the REACH (EU Exit) Regulations 2019**, on 1st January 2021 and is now known as UK REACH. UK REACH will now regulate the market access to Great Britain (GB) i.e. England, Scotland and Wales.

UK REACH has been described as mirroring its EU counterpart. With the aim of assisting the many exporters likely to be affected by the repeal of EU REACH in the United Kingdom, UK REACH provides for comprehensive transitional arrangements. Such arrangements concern both EU and non-EU based exporters dealing with substances which are already registered under EU REACH and now wishing to maintain access to the UK. Transitional provisions are, however, not applicable to those who will place the substances for the first time in the GB market.

In order to secure your access to the GB market, you should consider getting in touch with a GB-based OR without delay.

**We already have a GB-based OR facility, 'GPC-UK', to support our existing and new clients in addressing the challenges posed by Brexit on substance exports to the UK.**

### The benefits of DUIN

Maintaining access to the GB market while securing time to complete full registration of the substance within the deadline of 2, 4 or 6 years which is dependent on the tonnage band and hazardous properties.

### DUIN is not a pre-registration

DUIN only needs to be done once per legal entity and covers all substances that are EU REACH registered.

### DUIN must include, among other information:

**The identity of the manufacturer/importer, the identity of the substances, the registration no. of the substances under EU REACH....**

## WHO IS CONCERNED?

- Non-GB based exporters and GB-based importers of an EU-registered substance who placed their substance on the GB market before the end of the Transition period:
  - By completing a **Downstream User Import Notification (DUIN) by 27 October 2021**, they will maintain access to the GB market while postponing the registration deadline of their substance by 2, 4 or 6 years.
- Non-GB based exporters who wish to place an EU-registered substance on the GB market for the first time:
  - A **simplified registration process** allows them to place their substance on the GB market after submission of an art. 26 Inquiry, some initial substance information, and the registration fees. The full registration dossier must then be submitted within 2, 4 or 6 years
- Non-GB based exporters and GB-based importers of a non-EU-registered substance wishing to place their substance on the GB market for the first time:
  - They must **register** their substance under UK REACH before they can place it on the GB market. They may appoint a GB-based OR to complete the full registration of the substance.



IDEON Science Park (Beta 5)  
Scheelevägen 17,  
223 63 Lund, Sweden



compliance@uk.gpcregulatory.com

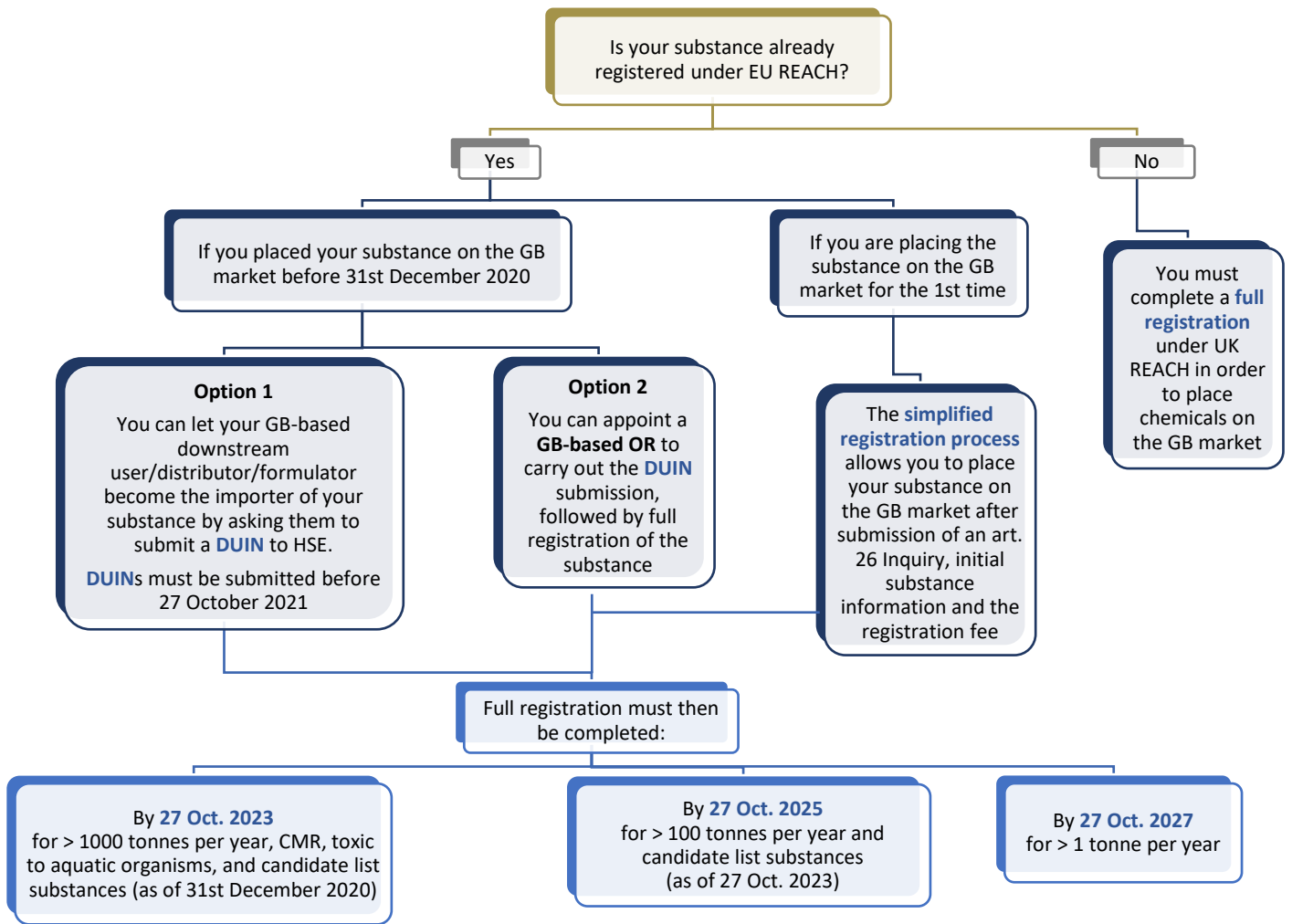


gpcgateway.com



linkedin.com/company/global-product-compliance-gpc-group/

## Which procedure applies to your business?



### Q&As – UK REACH (BREXIT)

**1. As a non-UK company exporting EU REACH substances, how can I maintain access to the GB market while complying with UK REACH?**

You should get in touch with your UK-based downstream user, distributor or formulator and discuss the possibility of them becoming the substance importer in the UK by submitting a DUIN notification. You can also appoint a GB-based OR to carry out the DUIN.

**2. What will happen if I miss the 27 October deadline for DUIN submissions?**

You will need to complete a full registration in order to place chemicals on the GB market.

**3. What will be the fees for DUIN notification?**

HSE will not incur any fees for DUIN notification. However, OR service charges will apply.

### ACTION POINTS

1. Identify the substances to be placed in the GB market in qty.  $\geq 1$  tpa apart from the EU exports earlier
2. Check- if the substance is already registered in EU-REACH as EU Registered substances may make you eligible for **DUIN** or **simplified registration**
3. Check- if the substance will be placed in the GB for the first time - Submit inquiry and registration dossier as soon as possible
4. Early submission means possibility to be a part of substance group so prioritise substances for inquiry submission immediately after DUIN
5. Check- if the SDS is updated or not – the substance classification should be as per the new GB CLP
6. Identify the competent OR to take responsibilities towards your UK-REACH compliances.
7. Be transparent to your OR and give complete information to avoid any non-compliances