

Q&A

Comply with UK-REACH: How can companies prepare?

#	Questions	Answers
1.	What will happen if I miss the DUIN deadline?	If you miss the DUIN deadline (27 October 2021) you will not be able to place your substance on the GB market until you fully register your substance under UK REACH.
2.	Does UK REACH apply to substances transiting through GB territory?	No, substances under customs supervision and substances that are being transported are specifically excluded from the scope of UK REACH
3.	Are polymers required to be registered under UK REACH? And monomers?	A polymer does not need to be registered under UK REACH. The monomers that compose it must, however, be registered separately.
4.	If we do Grandfathering of our EU registration, will my EU registration become invalid or will this be a mirroring of the information only. Do I need DUIN for these registered substance transfer in UK REACH IT?	<p>By grandfathering your GB-held EU REACH registration into UK REACH before April 30, 2021, you will ensure that it remains valid in GB. However, if you do not grandfather your EU REACH registration into UK REACH, it will cease to be recognized under UK REACH and it will thus become invalid in GB.</p> <p>You only need DUIN for substances registered under EU REACH (and the registration of which is held by an EU-based legal entity) which you wish to continue to place on the GB market past the end of the Brexit transition period.</p>
5.	For India based company having market in both EU and UK, If the registration was transferred to EU, do we need DUIN or grandfathering?	The key criterion is where the legal entity holding the registration is located. If it is in GB, the registration can be grandfathered into UK REACH. If the registration is held by an EU-based legal entity you must submit a DUIN (through your GB based importer or your GB-based OR) in order to maintain access to the GB market.

6.	If I want to submit a new product (hazardous chemical mixture) because I want to sell it in GB, what do I need to do?	Registration needs to be completed by submitting an Inquiry to HSE followed by full registration of the chemical.
7.	Sharing the costs of Letters of Assessment. How to fairly price data access to already registered EU Reach dossiers?	<p>Letter of Access cost is a point of discussion currently within the Lead registrants (LR) for those substances which were already registered in EU REACH. Some LRs indicate the UK REACH LOA cost to be covered with the already paid EU REACH LOA cost while some indicate to charge some admin fees.</p> <p>New Inquiries will however have to bear the UK REACH LOA cost.</p>
8.	Would like to know the timelines for registration	<p>2 years from 28th Oct 2021</p> <p>For-</p> <ul style="list-style-type: none"> >1000 t/a substances ≥ 1 t/a CMR substances ≥100 t/a very toxic to aquatic organisms ≥ 1 t/a active Candidate list subs. as on 31 Dec 2020 <p>4 years from 28th Oct 2021</p> <p>For-</p> <ul style="list-style-type: none"> 100-1000 t/a substances ≥ 1 t/a active Candidate list subs. as on 27 Oct 2023 <p>6 years from 28th Oct 2021</p> <p>For-</p> <ul style="list-style-type: none"> 1-100 t/a substances
9.	Is there any analytical data needs to be submitted for DUIN purposes?	HSE has requested the analytical information while submitting the DUIN but they have not mandated it. Analytical information is however necessary while submitting the Inquiry.

10.	Is registration required for chemicals used to make products/articles like polymers, bearings, etc.?	<p>The registrations are similar to that of EU REACH for polymers and bearings.</p> <p>So, since polymers are exempted from registrations, their individual monomers need to be registered.</p>
11.	What are the timescales for INQUIRIES? Do you have 6 years after placing a new INQUIRY to comply with UK REACH?	<p>Inquiries can be submitted anytime now. The early inquiry submissions mean you will get a chance to participate in the substance groups (similar to that of SIEF in EU REACH) and you will be able to know many details including who will be the LR, what can be the LOA cost and other compliance related communications.</p> <p>For existing chemicals, compliance will depend on the tonnage band of registration and classification as well.</p> <p>For new chemicals, compliance will however depend on how early you want to place the chemicals in GB market.</p>
12.	Please advise if any substance analytical data is to be submitted for DUIN? If yes, when: during DUIN or after DUIN. If after DUIN, then by when the analytical data to be submitted	<p>Analytical data is not necessary when you submit DUIN although it is an option. Analytical data is required during inquiry (if you are placing the substance on the market for the 1st time) or during the registration.</p> <p>It is recommended to have the analytical data ready when performing DUIN so that you can submit an inquiry right after DUIN. This will allow you to participate in the substance group and to know what is happening regarding the LoA costs, who is the LR etc.</p>
13.	If a substance is not EU REACH registered, can Non-UK manufacturer get DUIN performed through UK-based Only Representative for that non-Registered substance?	<p>No, since DUIN only applies to substances that are already registered under EU REACH.</p>

14.	<p>The name says UK REACH and everywhere the presentation says GB market, whereas there is difference in both.</p> <p>Please clarify which markets are covered. For Northern Ireland is EU REACH applicable?</p>	<p>The regulation is called UK REACH, although it applies in Great Britain (that is England, Wales, and Scotland)</p> <p>Northern Ireland, on the other hand, is still under EU REACH</p>
15.	<p>Could you confirm condition 2 to perform DUIN, the non-GB based manufacturer must hold a valid EU REACH Registration Number?</p>	<p>Yes, to be eligible for DUIN, your substance needs to be registered under EU REACH.</p> <p>To prove that this is the case, you need to show that you hold a valid registration number.</p>
16.	<p>According to my knowledge in EU REACH also mixtures need not be registered, but their components do >1 tonne.</p> <p>Is it the same with UK REACH?</p>	<p>Yes, mixtures are exempted, but components must be registered under UK REACH.</p>
17.	<p>If DUIN is not possible for substance that is not EU REACH Registered, then how to comply with UK -REACH for that substance?</p>	<p>If your substance is not registered under EU-REACH, DUIN will not be available.</p> <p>Instead, you will need to fully register your substance, and you will not be able to place that substance on the GB market until this is done.</p>
18.	<p>If a EU-27 company sells polymers into GB with monomers registered in EU by its manufacturers, can the polymer manufacturer submit a DUIN in GB?</p>	<p>Yes, this is possible provided that the monomers are registered under EU REACH and have been placed on the UK market between 1st January 2019 and 31st December 2020.</p>
19.	<p>Where can I check if the substances I am using as ingredients in my chemical mixture are registered according to GB-Regulation? Is there something relating like ECHA – Helpdesk?</p>	<p>There is a helpdesk, but it does not allow you to have a look into the substances notified/registered. If you are interested in proceeding with that activity you will need to do the DUIN if available (that is, if you placed EU REACH-registered substances on the GB market between 1st January 2019 and 31st December 2020).</p> <p>If your substances are not eligible for DUIN, an Inquiry will need to be submitted and then only you will be able to access the portal.</p>



20.	Under UK REACH, does a YEAR mean a CALENDAR YEAR? Or a year since the Manufacturer first placed his product on the GB market?	UK REACH is based on calendar years (1 st January – 31 st December)
21.	How can I check if our compounds are subject to REACH particularly if there are mixtures only?	The individual components will have to be registered or notified. We can help you to check whether the compounds have any kind of compliance requirements under UK REACH
22.	Having placed an inquiry, are you able to import straight away (above 1 tonne) or do you have to wait for the registration to complete?	The registration process must be completed before you can place the substance on the market.