

CEA consultancy support for compliance with the New UK Chemical Regulations after Brexit.



After the 29th March it is highly probable that the UK will be outside the scope of EU REACH and other EU Chemical regulations.

The UK is in the process of enacting its own legislation which mirrors EU REACH and this will be known as UK REACH Regulation. It will therefore retain the key principles of the EU REACH regulation, including its fundamental principle of "no data, no market" However, clarification is still required with regard to the formation of SIEFs, appointment of Lead Registrants (LRs), Only Representatives (OR), etc.

In order for non-UK manufacturers to continue to export substances to the UK, the non-UK manufacturers should appoint an UK legal entity to act as their "OR" under UK REACH, or rely on their UK customer to register the substance as an importer.

To support our clients, CEA will be offering the same consultancy support services under UK REACH as we currently provide under EU REACH.

The appointment of an "OR" under UK REACH should be confirmed on or before 29th March so that from the 30th March the OR can start the process of complying with UK REACH.

At the present time, we understand the process of UK REACH compliance for registrants who have registered under EU REACH to be as follows:

Notification within 60 days from the 30th March and full registration after 180 days.

However, industry has been lobbying to get these time periods extended and we are expecting that they may well be changed.

It is understood that the full registration under UK REACH will require a full data set, the same as that used by the Lead Registrant under EU REACH.

In order to purchase access to studies, careful negotiations will be required. CEA already offers this service and has previous experience of the purchase and sale of study data on behalf of our clients.

CEA is currently in continual contact with Defra and the group developing the "UK REACH-IT" system. As new information is released we will provide updates to our clients.

Other EU chemical regulations relating to substances used in other industrial areas (e.g biocides, plant protection products, food-related materials cosmetics etc") are being transposed into UK legislation. CEA also provides regulatory support in these areas.

If you have a specific issue regarding UK REACH or other UK Chemical regulations then please contact peter.godfrey@cea-res.co.uk, sarah.henly@cea-res.co.uk or neil.stearn@cea-res.co.uk.

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