



# UK REACH – Chemicals registration in United Kingdom

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care of your  
UK obligations

Companies placing chemical substances on their own or in a mixture in quantities above 1 tonne annually on the UK market need to register them under the UK REACH\* regime.

*\*Note: Strictly speaking, UK REACH applies to Great Britain (GB = England, Wales and Scotland). In Northern Ireland, a separate regime, Northern Ireland Protocol, is applicable. UK REACH is, however, more widely used than GB REACH.*

UK REACH has the same aims and principles as EU REACH. The Health and Safety Executive (HSE) acts as the lead UK regulatory authority under UK REACH. The UK has developed an IT system, called “**Comply with UK REACH**”, to support the submission of dossiers and information to the agency.

### EU or non-EU based companies

An EU based or non-EU based company exporting to the UK can register its substances under UK REACH through its legal entity in the UK (England, Scotland or Wales), via its UK importer or an UK-based OR.

Downstream Users under EU REACH, based in the UK and importing their substances from the EU, act as importers under UK REACH for non-UK REACH registered substances.

Downstream users must notify the HSE of their intention to continue importing substances from the EU by 27 October 2021 through providing a Downstream User Import Notification (DUIN).

A full data set for registration must then be submitted within 2, 4 or 6 years starting from 28 October 2021, depending on the tonnage band and hazard profile of the substance.

Exporting a non-EU and non-UK registered substance to the UK will require a full registration if the substance will be placed on the market above 1000 kg per year.

### UK-based companies

Companies based in England, Scotland and Wales and importing non-UK REACH registered chemical substances are required to register their substances under UK REACH, for which the UK provides the Downstream User Import Notification (DUIN) option for substances already registered under EU REACH.

Registration obligations can be avoided, if the EU or non-EU based supplier appoints an OR who takes responsibility for all registration duties in the UK.

Existing EU REACH registrations held by UK-based companies (including those held by an existing OR) have been automatically carried across into UK REACH ('grandfathered').

For the grandfathering process the following applies:

- Basic data about the company and the substance must be submitted by April 30, 2021.
- Full information will need to be submitted within 2, 4 or 6 years, depending on the registration deadlines set per tonnage band and hazard profile, as the HSE will no longer have direct access to the substance data held by the ECHA.

| Deadline for registration | Tonnage band                 | Hazardous Property  |
|---------------------------|------------------------------|---|
| 2 years                   | 1000 tonnes or more per year | <ul style="list-style-type: none"> <li>• Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year</li> <li>• Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year</li> <li>• Candidate list substances (as of 31 December 2020)</li> </ul> |
| 4 years                   | 100 tonnes or more per year  | <ul style="list-style-type: none"> <li>• Candidate list substances (as of 27 October 2023)</li> </ul>   |
| 6 years                   | 1 tonne or more per year     |   |

### Downstream User Import Notification (DUIN)

A successful DUIN defers a substance registration until the end of the relevant registration deadlines. The DUIN therefore allows the continued placing on the market and use of the notified substance in the UK (England, Scotland and Wales) for another 2 to 6 years after October 27, 2021.

The DUIN is followed by an Article 26 inquiry, a step introduced to UK REACH to ensure potential registrants have been assigned to the correct substance groups after notification and only for substances which need to be registered.

### Northern Ireland Protocol

For the duration of the Northern Ireland Protocol, EU REACH continues to apply to Northern Ireland (NI), while UK REACH is applicable in England, Wales and Scotland.

While companies in Northern Ireland keep their current EU REACH status and obligations, allowing them to continue placing their products on the EU market, they can also make use of a light-touch notification system ('Northern Ireland notifications') enabling ongoing market access to Great Britain for existing NI-based EU REACH registrations for qualifying NI goods (QNIG).

Northern Ireland notifications only apply to the import from Northern Ireland of QNIGs with a relevant connection to Northern Ireland, for example, substances, mixtures or articles that have been manufactured, formulated or produced in Northern Ireland.

### OUR SERVICES

- Only Representative services for non-UK based companies through our legal entity in the UK
- Data transfer to HSE for existing registrations, i.e. DUIN submission
- Registration support
- Substance Group and Joint Submission management
- Legal services related to EU REACH Letter of Access (LoA) issued via our legal partner, SCC Legal
- Developing regulatory strategies, including testing strategies for UK registrations
- Support and/or management of „Comply with UK REACH“ account

### CONTACT US

Contact our experts to learn more about our services for UK REACH and how we can help you make your chemicals fit for the UK market.

Please visit our website for more information:

<https://www.scc-gmbh.de/uk-chemicals-ukreach-compliance>

Or contact one of our experts:

[scc@scc-gmbh.de](mailto:scc@scc-gmbh.de)

