

Additional no deal Brexit REACH guidance: scenario summary table

Your company is	You want to	You need to	By when
1. a UK-based EU REACH registration holder (sole, joint or lead registrant; manufacturer, formulator, Only Representative or importer)	access the UK market	1. Open an account on UK REACH IT 2. Enter basic info on UK REACH IT 3. Provide technical information required under UK REACH	29 th May 2019
	access the EU/EEA market	EITHER Transfer your registration(s) to an EEA-based entity (e.g. affiliate or Only Representative)	29 th March 2021
		OR support your EEA-based importers to comply with EU REACH.	30 th March 2019 (see ECHA guidance for details)
			30 th March 2019 (see ECHA guidance for details)
2. a UK-based downstream user or a distributor of an EU REACH registered substance	procure substances or mixtures (directly or in articles) from a UK-based entity	take no further action	
	procure substances or mixtures (directly or in articles) from an EU/EEA-based entity	EITHER notify HSE by: 1. Opening an account on UK REACH IT 2. Entering basic info on UK REACH IT 3. Registering the substances with the UK REACH Agency (HSE) by providing the technical information required under UK REACH	26 th September 2019
		OR encourage the EU/EEA supplier to appoint a UK-based Only Representative	29 th March 2021
		OR change source to a UK registered supplier	26 th September 2019
3. a UK importer or distributor of substances	access the UK market	1. Open an account on UK REACH IT 2. Enter basic info on UK REACH IT	29 th May 2019

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	from outside the EU/EEA		3. Provide technical information required under UK REACH	29 th March 2021
	access the EU/EEA market		<i>EITHER</i> ensure your EU/EEA customers hold a valid EU REACH registration as importers <i>OR</i> ensure the non-EU/EEA manufacturer supplying them appoints an Only Representative based in an EU/EEA country	30 th March 2019 (see ECHA guidance for details) 30 th March 2019 (see ECHA guidance for details)
4.	a UK-based REACH authorisation holder	maintain your use or supply for a use in the UK	provide the UK REACH Agency (HSE) with the technical info relating to the authorisation	29 th May 2019
5.	a UK downstream user of a REACH authorisation held by an EU/EEA-based company	maintain your use or supply for a use in the UK	1. Confirm you are an existing authorised DU 2. Notify the UK REACH Agency (HSE) of: a. the existing EU authorisation; b. any conditions set out in the existing EU authorisation; c. the identity of the supplier of the substance.	29 th May 2019
6.	exempt through a PPORD	continue R&D use in the UK	1. Comply with the standard information requirement; 2. Notify the UK REACH Agency (HSE) of the number and notification date assigned by ECHA; 3. Supply the UK REACH Agency (HSE) with copies of any additional necessary information given to ECHA.	29 th May 2019
7.	awaiting an ECHA or EU Commission decision for:			

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- a new registration or update	Resubmit your registration dossier to the the UK REACH Agency (HSE)	Before placing products on the market
- an authorisation application where the EU Commission has adopted its final opinion	<ol style="list-style-type: none"> 1. Notify the Defra Secretary of State of the application; 2. supply the Secretary of State with copies of the application, the information included in it, and any other information provided to ECHA by the applicant for the authorisation which was material to the formation of ECHA's opinion; 3. give the Secretary of State copies of the opinions ECHA sent to the applicant. 	26 th September 2019
- an authorisation application where the EU Commission has not adopted a final opinion	<p>If you are a UK applicant, resubmit your application to the UK REACH Agency (HSE).</p> <p>If you are a DU awaiting a decision for an authorisation application made by your EU/EEA-based supplier, you will no longer be able to benefit from that authorisation, and will have to apply for a UK REACH authorisation. You should contact the UK REACH Agency (HSE) to discuss the best way of achieving compliance.</p>	26 th September 2019