

## Additional no deal Brexit REACH guidance: scenario summary table

Your company is	You want to	You need to	By when
1. a UK-based <b>EU REACH registration holder</b> (sole, joint or lead registrant; manufacturer, formulator, Only Representative or importer)	access the UK market	<ol style="list-style-type: none"> <li>1. Open an account on UK REACH IT</li> <li>2. Enter initial info on UK REACH IT</li> <li>3. Provide technical information required under UK REACH</li> </ol>	<p>120 days post-exit day</p> <p>2 years post-exit day</p>
	access the EU/EEA market	<p><b>EITHER</b> Transfer your registration(s) to an EEA-based entity (e.g. affiliate or Only Representative)</p> <p><b>OR</b> support your EEA-based importers to comply with EU REACH.</p>	<p>Exit day (see ECHA guidance for details)</p> <p>Exit day (see ECHA guidance for details)</p>
2. a UK-based <b>downstream user</b> or a <b>distributor</b> of an EU REACH registered substance	procure substances or mixtures (directly or in articles) from a <b>UK-based entity</b>	take no further action	
	procure substances or mixtures (directly or in articles) from an <b>EU/EEA-based entity</b>	<p><b>EITHER</b> notify HSE by:</p> <ol style="list-style-type: none"> <li>1. Opening an account on UK REACH IT</li> <li>2. Entering initial info on UK REACH IT</li> <li>3. Registering the substances with the UK REACH Agency (HSE) by providing the technical information required under UK REACH</li> </ol> <p><b>OR</b> encourage the EU/EEA supplier to appoint a UK-based Only Representative</p> <p><b>OR</b> change source to a UK registered supplier</p>	<p>180 days post-exit day</p> <p>2 years post-exit day</p>

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3.	a UK <b>importer</b> or <b>distributor</b> of substances from outside the EU/EEA	access the UK market	<ol style="list-style-type: none"> <li>1. Open an account on UK REACH IT</li> <li>2. Enter initial info on UK REACH IT</li> <li>3. Provide technical information required under UK REACH</li> </ol>	<p>120 days post-exit day</p> <p>2 years post-exit day</p>
		access the EU/EEA market	<p><b>EITHER</b> work with your EU/EEA customers to put in place valid EU REACH registrations as importers</p> <p><b>OR</b> work with the non-EU/EEA manufacturer of the substance for the manufacturer to appoint an EU/EEA-based Only Representative</p>	<p>Exit day (see ECHA guidance for details)</p> <p>Exit day (see ECHA guidance for details)</p>
4.	a UK-based REACH <b>authorisation holder</b>	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	60 days post-exit day
5.	a UK <b>downstream user of a REACH authorisation</b> held by an EU/EEA-based company	maintain your use or supply for a use in the UK	<ol style="list-style-type: none"> <li>1. Confirm you are an existing authorised DU</li> <li>2. Notify the UK REACH Agency (HSE) of: <ol style="list-style-type: none"> <li>a. the existing EU authorisation;</li> <li>b. any conditions set out in the existing EU authorisation;</li> <li>c. the identity of the supplier of the substance.</li> </ol> </li> </ol>	60 days post-exit day
6.	exempt through a <b>PPORD</b>	continue R&D use in the UK	<ol style="list-style-type: none"> <li>1. Comply with the standard information requirement;</li> <li>2. Notify the UK REACH Agency (HSE) of the number and notification date assigned by ECHA;</li> <li>3. Supply the UK REACH Agency (HSE) with copies of any additional necessary information given to ECHA.</li> </ol>	120 days post-exit day

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7. awaiting an ECHA opinion or EU Commission decision for:			
- 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 ECHA has adopted its final opinions but the Commission has not made a final decision		<ol style="list-style-type: none"> <li>1. Notify the Defra Secretary of State of the application;</li> <li>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 opinions;</li> <li>3. give the Secretary of State copies of the final opinions ECHA sent to the applicant.</li> </ol>	180 days post-exit day
- an authorisation application where the ECHA has not adopted final opinions		<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>	180 days post-exit day