

# Brexit: DU views on the future of chemicals regulation in the UK

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**tech**<sup>UK</sup>



techUK is the UK business organisation for companies operating in the digital economy from chip to click.

techUK is the current chair of the UK's REACH X Sector Group – an informal group of around 50 companies and trade associations representing downstream users of chemicals.

It meets three times a year to share views on REACH implementation and to highlight issues to UK government where we find them.

- We support the aims of REACH to protect workers, consumers and the environment from the risks that substances pose, based on scientific rigor and a solid understanding of how chemicals is used in practice.
- These aims, which improve chemical awareness and incentivise their substitution of hazardous substances for safer alternatives where it is possible to do so, should remain a UK commitment and ambition in the management of our chemicals.

- **Registration:** the status of, and access to, registration dossiers; security of supply for substances and formulations.
- **Existing Authorisation:** the status of authorisations to use substances of very high concern that are in the process of being applied for or have already been granted;
- **Substance equivalence:** the extent to which the UK mirrors updates to the Candidate List, the Authorisation List and restrictions – and the process for doing so;
- **Processing authorisation applications/restrictions exemption requests for substances whose sunset dates are after 2019:** The route for submitting applications for authorisation and the decision-making structures involved in its consideration.

# What do downstream users want?

## Arguments for retaining REACH

- **Access to the single market:** Anything that undermines or threatens that should be avoided. Companies wanting to access the single market will need to be REACH compliant at the point of sale anyway.
- **Regulatory divergence:** Can keeping pace powers truly work if the data that underpins decision making in Europe can't be accessed by UK regulators? Over time it is inevitable that further divergence will occur in respect to exemptions, time-frames and even substances adding manufacturing complexity and cost.
- **Intra-UK regulatory divergence:** REACH is complex, but REACH-esque regulations in England, Wales and Scotland brings a whole new layer of complexity for both UK operators and exporters.
- **Supply risks:** If Registration is considered too expensive for some SMEs registering to supply the EU, how can the economics work for a UK system that mirrors the UK?

## The arguments being put forward for an alternative to EU REACH

- **Reduce complexity:** Some companies, particularly SMEs, still consider REACH to be hugely complex. They are still looking for simpler regime that works for companies of all sizes.
- **Authorisation/restrictions in the workplace:** Recognise that health and safety standards are frequently more stringent in the UK than other EU markets.
- **Communication in the supply chain:** Reduce the complexity of Article 33 to a system that actually helps to inform the right people of potential risks associated with SVHCs in products in the right way.
- **Improve extended safety data sheets** to deliver eSDSs that can actually be more widely used on the shop floor.



Source: EEF EU Referendum Impact Survey 2016

Thank you!

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