

Helsinki, 12 September 2019

Subject: Downstream users urged to act ahead of the UK's withdrawal from the EU

Dear Accredited Stakeholder,

I am addressing you as one of ECHA's Accredited Stakeholder Organisations representing industry.

I am seeking your support in reaching downstream users, who may rely on supply chains originating from a UK-based REACH registration.

Following the extension of membership of the United Kingdom to the EU in April 2019, the United Kingdom will be a "third country" as of 1 November 2019. In view of the uncertainties surrounding the ratification of the Withdrawal Agreement, ECHA recommends to companies to prepare for the eventuality of a no deal, i.e. that the UK leaves the EU without the Withdrawal Agreement, and thus without a transition period.

In the event of no deal, registrations by UK manufacturers and importers that were not transferred to an EU-27/EEA based entity or only representative will become void. Downstream users located in the EU-27/EEA of the substances covered by these void registrations will be affected and action is needed to minimise unwanted impact.

Downstream users should check the "list of substances registered only by UK companies". An updated list is now available on ECHA's website, listing 750 substances. For these substances, downstream users should start enquiring in the supply chain to assess if there will be a transfer of registration or if they will source directly from the UK. In the latter case, they should prepare for registering the substance themselves as an importer under REACH, unless an only representative has been appointed for that registration in the EU-27/EEA. ECHA's web pages include ample advice on how to register for the first time.

For substances registered in the UK but also elsewhere in the EU-27/EEA, downstream users whose supplier is a UK registrant can also consider switching to a different EU-27/EEA supplier. These substances can be found from the Registered Substances database on the ECHA website; this concerns about 3 000 substances.

For further advice on ECHA's web pages on the UK's withdrawal from the EU please follow the links below.

Yours sincerely,

Jukka Malm

Deputy Executive Director

FURTHER INFORMATION

- List of substances registered only by UK companies [XLSX]
- The withdrawal of the UK from the EU
- Questions and answers for companies
- Advice to companies
- The EU Commission's "Brexit preparedness checklist for businesses"