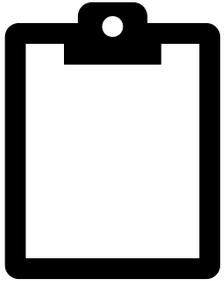
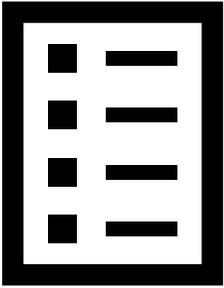


Brexit an impact on Chemical Regulation for UK A&S manufacturers

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BASA
**BRITISH ADHESIVES &
SEALANTS ASSOCIATION**



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Agenda

Today I will cover what will happen if we;

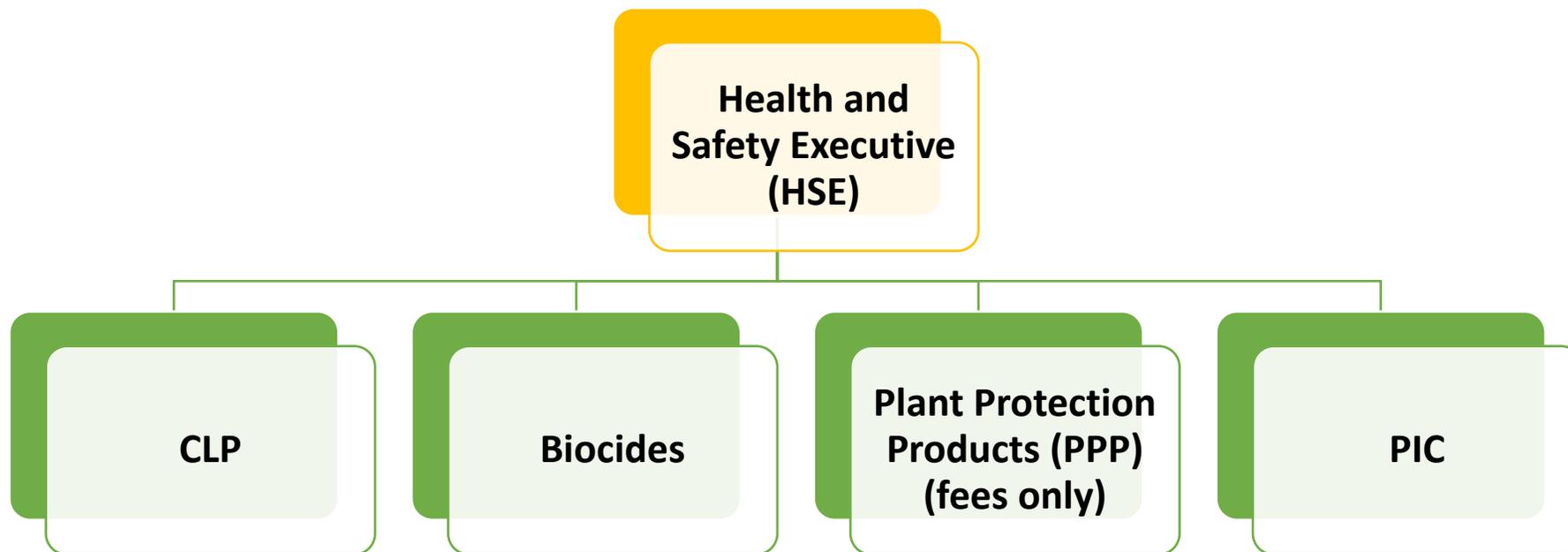
- Leave EU with no deal
- Leave EU with deal
- Don't leave the EU

Background

- Who?
- What?
- Where?
- When?
- Why?
- How?



BREXIT NO DEAL RESPONSIBILITIES



HSE

BREXIT NO DEAL RESPONSIBILITIES

Department for
Environment, Food
and Rural Affairs
(DEFRA)

REACH

Pesticides

Plant
Protection
Products
(PPP)
(except
fees)

Detergents

Mercury

Persistent
Organic
Pollutants
(POPs)

DEFRA

BREXIT NO DEAL RESPONSIBILITIES

Transport remains with the
Department for Transport
(DfT)



Technical papers published

- Regulating chemicals (REACH) if there's no Brexit deal
- Control on persistent organic pollutants if there's no Brexit deal
- Control on mercury if there's no Brexit deal
- Regulating pesticides if there's no Brexit deal
- Maintaining the continuity of waste shipments if there's no Brexit deal
- Regulating biocidal products if there's no Brexit deal
- Classifying, labelling and packaging chemicals if there's no Brexit deal
- Export and import of hazardous chemicals if there's no Brexit deal

UK would establish an independent standalone chemicals regime – very similar to CLP, so most of it will still apply. Eg roles and obligations, testing, classification, labelling, packaging and notification.

UK would adopt the United Nations Globally Harmonised System (UN GHS) in the same way as the EU.

HSE would take on ECHA's role – so notification would be done to HSE rather than ECHA

Companies importing chemicals into the UK from EU countries would become importers under CLP, in the same way UK companies would be importers into Europe.

In future, the UK will be free to make its own decisions about chemical hazard classification, including whether or not to align with decisions made in the EU or other countries

CLP NO DEAL BREXIT

REACH NO DEAL BREXIT

Registration	Existing EU	Existing UK	Basic Info	Full data
<p>Registration will be required under both EU and UK systems.</p>	<p>Transfer to an EU based affiliate, importer, OR. ECHA has opened a “Brexit window” to allow for legal entity changes. suspensive conditional clause recommended.</p>	<p>Existing UK registrations and authorisations will be grandfathered into UK law and will remain valid.</p>	<p>Provide to HSE within 120 days - name, address, existing registration, tonnage band, etc., so that the UK has a record of registrations. (recently extended from 60 days)</p>	<p>Same as the REACH data package) will need to be provided within 2 years.</p>

REACH NO DEAL BREXIT

Importers

180 days to identify themselves and provide basic info. Over a longer period (time frame not yet specified) the full data package will be needed

Pipeline

Registrations still in the pipeline at the time of UK withdrawal cannot be grandfathered, only those registrations in place before exit day.

New IT

New IT system via www.gov.uk website

Cost

The UK is not currently planning to charge to grandfather existing registrations. For new registrations fees are expected to be similar to ECHA.

Authorisations

Authorisations in progress through ECHA, but not yet decided, will become void and will need to be resubmitted.

What should
YOU be
doing?



Keep up to date with Brexit negotiations



Communicate with your suppliers



Understand your supply chain



Consider options



LOA and use of data



Allocate a budget



Be ready to initiate your plan



What if we leave with a deal?

What if we don't leave?



Other options?

Referendum

Cancel Brexit

Full
Renegotiation

General
Election

Deal

No deal



OPTIONS

Concluding Remarks



MONITOR



PLAN



CONSIDER



BE READY

Come and talk to us on Stand K5



Thankyou for your attention
