

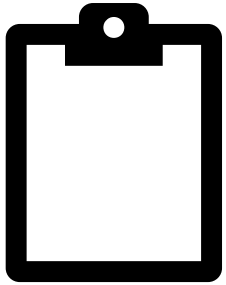
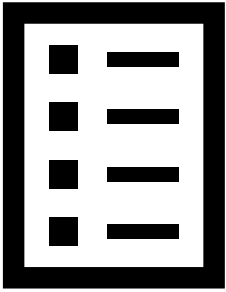
# Brexit an impact on Chemical Regulation for UK A&S manufacturers

---

**Caroline Raine**  
**BASA Consultant**



**BASA**  
**BRITISH ADHESIVES &  
SEALANTS ASSOCIATION**



**BRITISH ADHESIVES &  
SEALANTS ASSOCIATION**

# Agenda

Today I will cover what will happen if we;

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

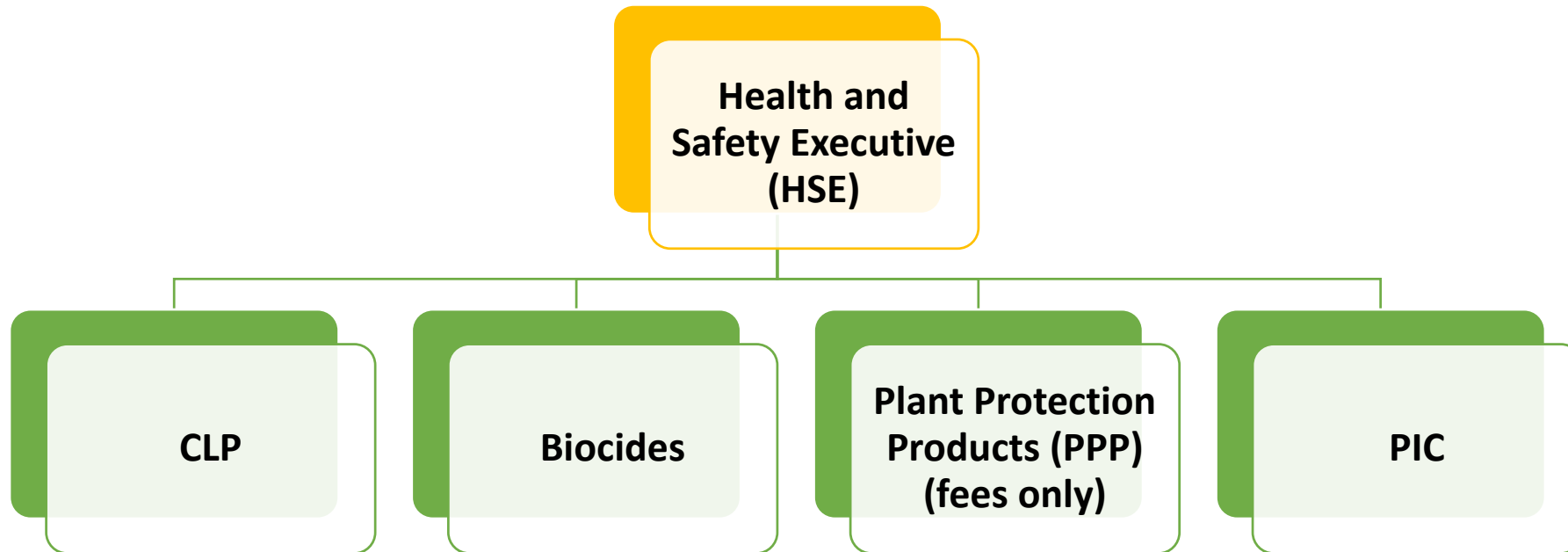
# Background

---

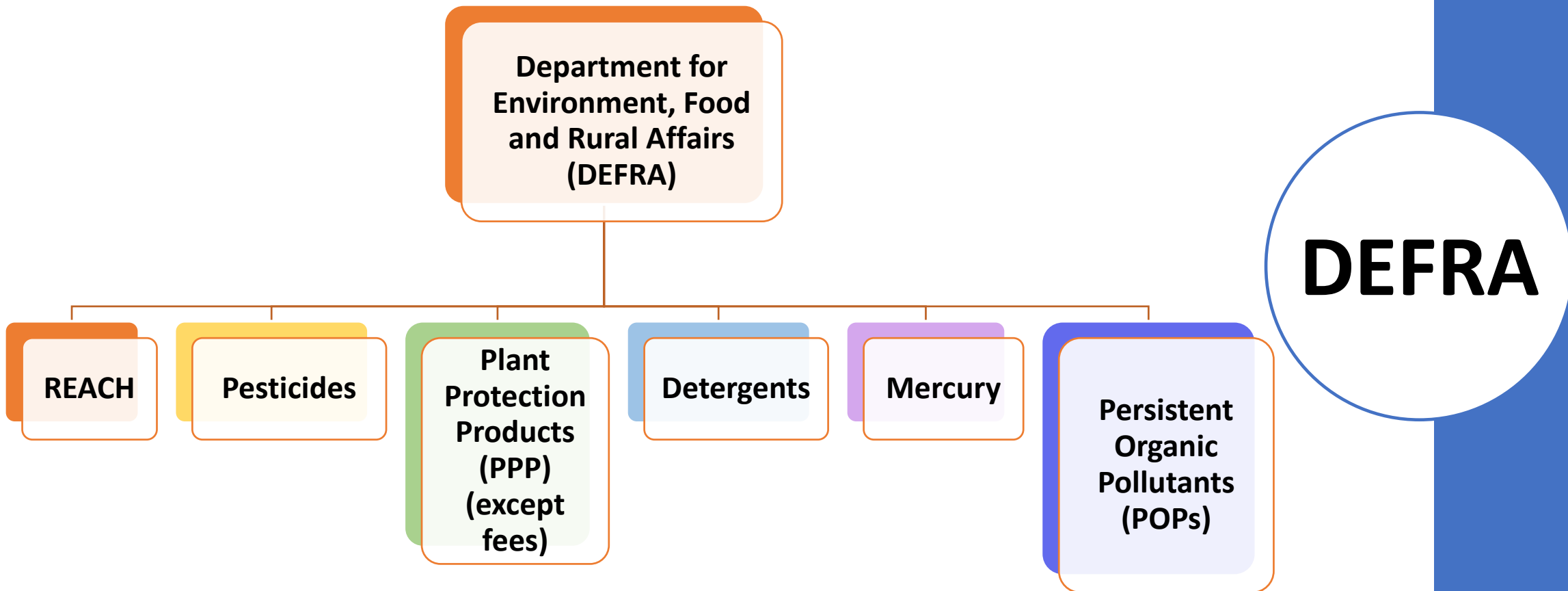
- Who?
- What?
- Where?
- When?
- Why?
- How?



# BREXIT NO DEAL RESPONSIBILITIES



# BREXIT NO DEAL RESPONSIBILITIES



# 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
Registration will be required under both EU and UK systems.	Transfer to an EU based affiliate, importer, OR. ECHA has opened a “Brexit window” to allow for legal entity changes. suspensive conditional clause recommended.	Existing UK registrations and authorisations will be grandfathered into UK law and will remain valid.	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)	Same as the REACH data package) will need to be provided within 2 years.

# REACH NO DEAL BREXIT

Importers	Pipeline	New IT	Cost	Authorisations
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	Registrations still in the pipeline at the time of UK withdrawal cannot be grandfathered, only those registrations in place before exit day.	New IT system via <a href="http://www.gov.uk">www.gov.uk</a> website	The UK is not currently planning to charge to grandfather existing registrations. For new registrations fees are expected to be similar to ECHA.	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

A woman with long, dark, curly hair in a single braid, wearing a light blue button-down shirt. She has a wide-eyed, surprised, or perhaps questioning expression on her face. Her hands are held out at shoulder level, palms up, in a shrugging gesture. The background is a plain, light-colored wall.

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

---