



Department
for Environment
Food & Rural Affairs

Consultation on Extending the UK REACH Transitional Registration Submission Deadlines

14 July 2025

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Foreword

This consultation is seeking views from stakeholders on the government's proposals to extend the UK REACH transitional registration submission deadlines. The existing deadlines are October 2026, October 2028 and October 2030. These deadlines are

phased according to the tonnages and hazard profiles of the substances being registered.

Under UK REACH, businesses are required to register with the UK REACH Agency (the Health and Safety Executive, HSE) information on chemicals substances that are placed on the GB market. When the UK left the EU, information on substances on the GB market which had been registered with UK REACH was not passed to the HSE. The substances in question have remained on the GB market, but this information still needs to be registered with UK REACH.

The UK REACH alternative transitional registration model (ATRM) will specify what these information registration requirements involve. A public consultation from May 2024 to July 2024 set out some proposals, which had been developed under the previous government administration by Defra, the Health and Safety Executive (HSE) and the Environment Agency (EA). The current government, in cooperation with the Devolved governments in Scotland and Wales, is considering the next steps. Given that the detailed design of the ATRM is still under review, we cannot confirm at this stage exactly what information industry will be required to provide by the submission deadlines. However, it is our expectation that the final information requirements will not exceed those outlined in the 2024 ATRM consultation.

Given these ongoing considerations, it will no longer be possible to deliver the legislative changes to implement ATRM before the current first submission deadline in October 2026 together with a suitable transition period.

It is therefore necessary to consult on revised transitional submission deadlines, which provide sufficient time for the government to complete the ATRM and for industry to prepare to comply.

The proposed new deadlines under consultation are:

- **Option 1:** October 2029, October 2030, October 2031
- **Option 2:** April 2029, April 2031, April 2033
- **Option 3:** April 2029, April 2030, April 2031

Option 1 is the government's preferred option as it allows time to finalise the design and implementation of the ATRM and provides industry with a transition period of approximately two years.

Moving from a two-year gap to a one-year gap between deadlines would provide sufficient time for information to be gathered and submitted by industry, while managing down the overall period before the regulators are in receipt of complete registration data.

This consultation is also seeking views on the government's proposal to extend the dates for the requirement on HSE to carry out compliance checks on 20% of

registration dossiers received. This applies under Article 41(5) of the UK REACH Regulation. At present this duty aligns with the current submission deadlines.

Part 1- Introduction

Introduction

1. The UK REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) Regulation¹ is one of the main pieces of legislation for the regulation of chemicals in Great Britain (GB), which replaced EU REACH² in GB from 31 December 2020 (European Union (EU) exit). It established the UK REACH regime, which regulates the manufacture, placing on the market and use of substances in GB. EU REACH continues to apply in Northern Ireland³.
2. UK REACH requires substances that are manufactured in, or imported into, GB to be registered with the Agency for UK REACH (the Health and Safety Executive (HSE)). Registration data provides essential information on a substance's hazards, uses, and potential exposures.
3. This information enables UK authorities to perform their regulatory functions effectively. It supports registrants in determining appropriate risk management measures for their own operations, and for other users down the supply chain.
4. In relation to substances which had previously been registered with EU REACH and which now need to be registered with UK REACH, in 2019 a single deadline of October 2021 was initially set for completing the transitional registration process. This was later replaced in 2020 by a phased approach, with new deadlines⁴ in October 2023, October 2025, and October 2027, depending on tonnage bands and the hazard profile of substances.
5. In response to stakeholder concerns regarding the costs associated with acquiring the data required for these registrations under UK REACH, the transitional registration submission deadlines were extended⁵ in 2023 to give the government time to develop an alternative transitional registration model (ATRM), to legislate for this new registration model, and to provide industry with a two-year transition period.
6. The aim of the ATRM is to reduce the costs to businesses from transitioning from EU REACH to UK REACH, while ensuring a high level of protection for human health and the environment. The current deadlines for completing this transitional registration process are as outlined on Table 1.

¹ [Regulation \(EC\) No 1907/2006](#).

² EUR 2006/1907

³ Under the Windsor Framework

⁴ The REACH etc. (Amendment etc.) (EU Exit) Regulations 2020

⁵ The REACH (Amendment) Regulation 2023, Article 127P

Table 1: Current deadlines

Current Deadline	Tonnage	Hazardous Properties
27 Oct 2026	1,000 tonnes or more per year	<ul style="list-style-type: none">• Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year• Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year• Candidate list - Substances of Very High Concern (SVHC) as at 31 December 2020
27 Oct 2028	100 tonnes or more per year	<ul style="list-style-type: none">• Candidate list SVHC substances as at 27 October 2023
27 Oct 2030	1 tonne or more per year	N/A

7. The [2024 ATRm consultation](#) sought views on a proposed ATRm model. Whilst this remains under consideration, our expectation is that the final transitional registration requirements will not exceed those outlined in the consultation.
8. Given that the first transitional registration deadline arises in October 2026, i.e. in much less than two years' time, and given the need for a suitable transition period after the ATRm legislation has been made, we now need to change the current transitional registration deadlines.
9. This consultation also includes a proposal to extend the legislative timelines for HSE to conduct compliance checks on 20% of registration dossiers, as required under Article 41 of the UK REACH Regulation. These timelines must be adjusted in line with the amended transitional registration submission deadlines.

Purpose of the consultation

10. The purpose of this consultation is to seek stakeholders' views on the government's proposals to extend the current UK REACH transitional registration submission deadlines. There are four options under consideration including a do-nothing option. Views are also being sought on the government's proposal to extend the dates for the HSE requirement to carry out compliance checks on 20% of registration dossiers, as required under Article 41(5) of the UK REACH Regulation. At present this duty aligns with the current submission deadlines.
11. An explanation by the Secretary of State on the consistency of the proposed amendments with Article 1 of the UK REACH Regulation (the 'Article 1 Consistency Statement') is published alongside this consultation.

Policy options

12. The options being considered and which are the subject of this consultation, are listed in Table 2:

Table 2: Options for data submission deadlines

Current Deadline (do nothing option)	Option 1	Option 2	Option 3	Tonnage	Hazardous Properties
27 Oct 2026	27 Oct 2029	27 April 2029	27 April 2029	1,000 tonnes or more per year	Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year Candidate list of SVHC ⁶
27 Oct 2028	27 October 2030	April 2031	April 2030	100 tonnes or more per year	Candidate list of SVHC substances
27 Oct 2030	27 October 2031	April 2033	April 2031	1 tonne or more per year	

Description of options considered

13. **Do Nothing** - this option requires no change to the current submission deadlines of 27 October 2026, 27 October 2028, and 27 October 2030.

14. If no action is taken, the first deadline of 27 October 2026 will either occur before government has finalised and legislated for the ATRm or will occur soon afterwards. This would mean that companies might start to invest in acquiring the data needed to meet the current legislative requirements, which might be deemed redundant under the criteria set by ATRm. Alternatively, it might mean that companies wait for the ATRm requirements to be announced and then seek to comply with those requirements, but with a very compressed transition period.

⁶ SVHC identified in accordance with Article 59 of the UK REACH Regulation

15. **Option 1** – Move the first submission deadline by 3 years to 27 October 2029, the second by 2 years to October 2030 and the third by 1 year to October 2031. **Option 1 is the preferred option** illustrated in Table 3 below.

Table 3: UK registration submission deadlines under Option 1

Current Deadline	Option 1	Tonnage	Hazardous Properties
27 Oct 2026	27 Oct 2029 (+3 years)	1,000 tonnes or more per year	<ul style="list-style-type: none"> • Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year • Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year • SVHC substances on the Candidate list before 27 October 2029
27 Oct 2028	27 Oct 2030 (+2 years)	100 tonnes or more per year	<ul style="list-style-type: none"> • SVHC substances on the Candidate list before 27 October 2030
27 Oct 2030	27 Oct 2031 (+1 year)	1 tonne or more per year	

16. Moving the first submission deadline back by 3 years is the most realistic option to give the government time to finalise and implement an ATRm, and to give sufficient time for businesses to comply with it, especially those subject to the first deadline.
17. This option also reduces the intervals between deadlines from two years to one year. A one-year gap between deadlines would allow time for information to be gathered and submitted by industry, while managing down the overall period before the regulators are in receipt of the registration data. This is the period when companies would not have to demonstrate that they understand the hazards and risks connected to the substances they manufacture or place on the market, with its potential for increasing risk to the protection of human health and the environment. This option would allow the HSE time to manage compliance checking under the ATRm currently being developed.
18. Shorter intervals of one year are considered appropriate, as the ATRm currently under development is intended to significantly reduce the information burden on industry compared to existing UK REACH registration requirements. Furthermore, the original rationale for the longer two-year intervals was to allow time for industry to negotiate access to EU-held data. The current ATRm in development proposes to remove this necessity.

19. **Option 2** - Move submission deadlines for each tonnage band back by 2½ years to 27 April 2029, 28 April 2031 and 27 April 2033.

Option 2 would move all the submission deadlines back by 2½ years, as illustrated in Table 4- below, and would retain the current two-year gaps between the registration deadlines.

Table 4: UK registration submission deadlines under Option 2

Current Deadline	Option 2	Tonnage	Hazardous Properties
27 Oct 2026	27 April 2029 (+ 2½ years)	1,000 tonnes or more per year	<ul style="list-style-type: none"> • Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year • Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year • SVHC substances on the Candidate list before 27 April 2029
27 Oct 2028	28 April 2031 (+ 2½ years)	100 tonnes or more per year	<ul style="list-style-type: none"> • SVHC on the Candidate list before 28 April 2031
27 Oct 2030	27 April 2033 (+ 2½ years)	1 tonne or more per year	

20. As with Option 1, this option would give government time to introduce the ATRm and would provide those subject to the first deadline in particular with sufficient time to comply with it. It assumes that the relatively small number of companies subject to the first deadline would need a transition period of less than two years to comply with the ATRm.

21. However, this may offer a lower level of protection for human health and the environment than Option 1. As it retains the two-year gaps between the registration deadlines. Compared to Option 1, this extends the overall period provided for companies to submit the required information.

22. **Option 3** – Move the first submission deadline 2½ years to April 2029, the second 1½ years to April 2030 and the third ½ year to April 2031.

23. This option moves the first submission deadline on 27 October 2026 by 2½ years to 27 April 2029, the second submission deadline by 1½ years to 29 April 2030, and the third by 6 months to 28 April 2031.

24. Option 3 applies one-year gaps between the registration deadlines, as with Option 1, but under Option 3 the data would be submitted to the HSE 6 months earlier in each bracket (i.e. in April rather than October) as illustrated in Table 5 below.

Table 5: UK registration submission deadlines under Option 3

Current Deadline	Option 3	Tonnage	Hazardous Properties
27 Oct 2026	27 April 2029 (+2 ½ years)	1,000 tonnes or more per year	<ul style="list-style-type: none"> • Carcinogenic, mutagenic or toxic for reproduction (CMRs) - 1 tonne or more per year • Very toxic to aquatic organisms (acute or chronic) - 100 tonnes or more per year • SVHC on the Candidate list before 27 April 2029
27 Oct 2028	29 April 2030 (+1½ years)	100 tonnes or more per year	<ul style="list-style-type: none"> • SVHC on the Candidate list before 29 April 2030
27 Oct 2030	28 April 2031 (+½ year)	1 tonne or more per year	

25. This option has similar strengths to Option 1. Compared to Option 1, the main difference is that this option assumes that the relatively small number of companies subject to the first deadline would need a transition period of less than two years. The combination of an earlier first submission date compared to Option 1, plus the same one-year gaps as Option 1, means that Option provides the shortest overall registration period.

26. The justification for Option 3 having one-year time gaps is the same as the justification applying to Option 1.

Audience

27. This is a public consultation, and we welcome all views. The primary audience is those who will be involved in the registration process including the chemical industry, downstream users of chemicals and its stakeholders. We also welcome views from NGOs and other interested parties. The questions are presented in a way to

accommodate both a general audience and stakeholders with specialist knowledge in the regulation of chemicals.

Responding to this consultation

28. Please respond to this consultation in one of the following ways:

Online using the [Citizen Space consultation hub at Defra](#) For ease of analysis, responses via the Citizen Space platform would be preferred, if possible, but alternative options are provided below if required:

By email to: UKREACHextension@defra.gov.uk

By post:

UK REACH Legislation and Policy team,
Defra Ground Floor, Seacole Building,
2 Marsham Street,
London, SW1P 4DF

Duration

29. This consultation will run for 8 weeks. The consultation opened on 14 July 2025 and closes on 8 September 2025. Please note, any responses sent by post must arrive at the above address by the closing date of the consultation 8 September 2025 to be counted. Any responses received after this date will not be analysed.

After the consultation

30. After the consultation, a summary of the responses to this consultation will be published and placed on the government website at www.gov.uk/defra. Responses to this consultation will be reviewed and considered in the future policy development of the regulations.

31. Information provided in response to this consultation document, including personal information may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes e.g., Freedom of Information Act 2000 (FOIA), Environmental Information Regulations 2004 (EIR) and the Data Protection Act 2018.

Compliance with the consultation principles

32. This consultation is being conducted in line with the Consultation Principles set out in the Better Regulation Executive guidance which can be found at: <https://www.gov.uk/government/publications/consultation-principles-guidance>.

If you have any comments or complaints about the consultation process, please address them to:

By e-mail: consultation.coordinator@defra.gov.uk

Or in writing to:

UK REACH Policy and Legislation Team, Defra
Seacole Building
2 Marsham Street
London
SW1P 4DF

About you

33. The questions below are intended to reflect this diversity and put your responses in perspective with those of other respondents.

Confidentiality and data protection information

34. A summary of responses to this consultation will be published on the government website at: www.gov.uk/defra. An annex to the consultation summary will list all organisations that responded but will not include personal names, addresses or other contact details.

35. Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (for example, home address, email address, etc).

36. If you click on 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances.

37. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

38. If you click on 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we will not make your personal name and private contact details publicly available.

Using and sharing your information

39. There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.
40. How we use your personal data is set out in the consultation and call for evidence exercise privacy notice which can be found here: <https://www.gov.uk/government/publications/defras-consultations-and-call-for-evidence-exercises-privacy-notice>

Other Information

41. This consultation is being conducted in line with the Cabinet Office “Consultation Principles” and be found at: [Microsoft Word - Consultation Principles \(1\).docx \(publishing.service.gov.uk\)](#)

Part 2 - Consultation questions

Confidentiality and some details about you

1. Would you like your response to be confidential? (required)

Yes

No

If you answered Yes to this question, please give your reason.

2. What is your name?

Francesca Rapolla

3. What is your email address?

If you enter your email address, then you will automatically receive an acknowledgement email when you submit your response.

frapolla@ctpa.org.uk

4. Are you responding as an individual or on behalf of an organisation?

Individual

Organisation

5. What type of organisation are you responding on behalf of?

A government body

- Non-governmental organisation (NGO)
- Local authority
- Charity
- Consultancy
- Small or micro business (Less than 50 employees, including any global operations)
- Medium business (50 to 249 employees, including global operations)
- Large business (250 or more employees, including global operations)
- Trade association
- Industry association
- Other

If you answered Other, please state your organisation type.

6. If you are responding on behalf of an organisation, what is the name of the organisation?

The Cosmetic, Toiletry and Perfumery Association (CTPA).

7. For organisations that have legal responsibilities as a result of UK REACH, what is your role? (Select all that apply)

- Only Representative (OR)
- Manufacturer of substances
- Importer of substances and/ or mixtures from the EU or European Economic Area (EEA)
- Importer of substances and/ or mixtures from Northern Ireland
- Importer of substances and/or mixtures from Rest of the World (RoW)

- Exporter of substances from GB to the EU or EEA
- Exporter of substances from GB to RoW
- Downstream user of chemical substances (companies who directly handle chemical substances in the course of their business activities and are not themselves the GB-based manufacturer or importer of the substances)
- Not applicable
- Other, please specify:

Questions on Policy Options

8. Please rank the following options in order of preference, with 1 being your most preferred and 4 your least preferred:

Options

- Do nothing

4

- Option 1

2

- Option 2

1

- Option 3

3

Please explain the reasons for your ranking, including any comments on the strengths or weaknesses of specific options.

Please refer to the attachment for details of this answer

9. Please tick which of the tonnage bands apply to your business.

- 1,000 tonnes or more per annum
- 100 tonnes or more per annum

10 tonnes or more per annum

All

N/A

10. What impact do you think your preferred option for extending the deadlines would have on UK REACH's aim of ensuring a high level of protection for human health and the environment?

Please explain below

Please refer to the attachment for details of this answer

11. Please provide views and evidence on any cost impact, to either the chemical industry or consumers, not detailed above, of extending the deadlines while the ATRm policy is being finalised.

Please refer to the attachment for details of this answer

Extending the deadlines for selecting 20% of dossiers for compliance checking under Article 41(5) of UK REACH

12. Do you agree with the government's proposal, as set out in paragraph 9 of Part 1, to move the current compliance check deadlines so that they align with the proposed submission deadlines?

Yes

No

Please explain the reasons for your answer

Please refer to the attachment for details of this answer

13. What are your views on how the compliance checks should be scheduled in relation to the submission deadlines?

Please explain the reasons for your answer

Please refer to the attachment for details of this answer

14. Are there any additional points, considerations, or concerns you wish to raise that have not been covered in your responses above?

No additional points to raise.