



Department
for Environment,
Food & Rural Affairs

Consultation outcome

Summary of responses and government response

Updated 22 December 2025

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Introduction

This document provides a summary of the responses received by the Department for Environment, Food and Rural Affairs (Defra) to its consultation on extending the current UK REACH transitional registration submission deadlines. The consultation was open for 8 weeks and closed on 8 September 2025.

The consultation document contained 14 questions, of which 7 related to respondent information, providing important contextual detail. This summary presents an overview of the main themes and messages emerging from the consultation, alongside the government's response to those points.

Defra is grateful to all those who engaged with the consultation and submitted responses. The evidence and views received have been carefully considered and analysed by officials in developing the government's position.

Background to the consultation

The UK REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) Regulation is one of the main pieces of legislation for the regulation of chemicals in Great Britain (GB), which replaced EU REACH 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 Ireland. UK REACH is a replica of EU REACH, with minor changes to make it operable here in GB.

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.

This information supports registrants in determining appropriate risk management measures for their own operations, and for other users down the supply chain. It also enables UK authorities to perform their regulatory functions effectively.

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 deadlines in October 2023, October 2025, and October 2027, depending on tonnage bands and the hazard profile of substances.

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 extended 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 2-year transition period.

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, depending on tonnage and hazard profile of the substance, are set down in Article 127P of UK REACH and are:

- 27 October 2026 for substances included on the EU REACH Candidate List or UK REACH Candidate List before 31 December 2023; substances that are carcinogenic, mutagenic or toxic for reproduction and manufactured or imported in quantities of 1 tonne per year (tpa) or more per manufacturer or importer; substances that are very toxic to aquatic life and manufactured or imported in quantities of 100 tpa or more; and all substances manufactured or imported in quantities of 1,000 tpa or more.
- 27 October 2028 for substances added to the UK REACH Candidate List between 1 January 2024 and 27 October 2026; and all substances manufactured or imported in quantities of 100 tpa or more per manufacturer or importer
- 27 October 2030 for all other substances manufactured or imported in quantities of 1 tpa or more per manufacturer or importer

The [2024 ATRm consultation](https://consult.defra.gov.uk/reach-policy/atrm-consultation/supporting_documents/UK%20REACH%20Consultation%20%20May%202024%20English%20version.pdf) (https://consult.defra.gov.uk/reach-policy/atrm-consultation/supporting_documents/UK%20REACH%20Consultation%20%20May%202024%20English%20version.pdf) 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. Given that the first transitional registration deadline arises in October 2026, i.e. in much less than 2 years' time, and given the need for a suitable implementation period after the ATRm legislation has been made, it has become necessary to amend the current transitional registration deadlines

The current consultation also includes a proposal to extend the legislative timelines for HSE to conduct compliance checks on at least 20% of registration dossiers, as required under Article 41(5) of the UK REACH Regulation. These timelines must be adjusted in line with the amended transitional registration

submission deadlines to ensure HSE are able to make the relevant checks for compliance after the data has been submitted.

Purpose of the consultation and options considered

The purpose of this consultation was to seek the views of interested parties on our proposal to extend the current UK REACH submission deadlines by up to 3 years. We consulted on 3 options, developed in cooperation with the Devolved Governments for Scotland and Wales including a do-nothing option.

- Baseline – Do Nothing – do not change the current submission deadlines (27 October 2026, 27 October 2028 and 27 October 2030).
- Option 1 - Moves the first submission deadline back by 3 years and would apply one-year gaps between the registration deadlines. This would mean deadlines of 27 October 2029, 27 October 2030 and 27 October 2031. Option 1 is the government's preferred option.
- Option 2 - Moves all the submission deadlines back by 2½ years and would retain the current 2-year gaps between the registration deadlines. This would mean deadlines of 27 April 2029, 27 April 2031 and 27 April 2033.
- Option 3 - Moves the first submission deadline back by 2½ years and would apply one-year gaps between the registration deadlines. This would mean deadlines of 27 April 2029, 27 April 2030 and 27 April 2031.

We also sought views on our proposal to make related amendments to the dates for compliance checks under Article 41(5) of the UK REACH Regulation, so they are linked to the proposed data submission deadlines and to ensure that this regulatory process is applied in the most effective manner. This would not be possible if the Agency continued to be subject to the current dates for compliance checks, as they would fall before the relevant submission deadlines.

Consultation process

The consultation ran for 8 weeks, between 14 July and 8 September, and was live on the Citizen Space website. An [Article 1 Consistency Statement](#)

[\(https://consult.defra.gov.uk/reach-policy/extending-the-uk-reach-submission-deadlines/supporting_documents/UK%20REACH%20Article%201%20Consistency%20Statement%20English%20version.pdf\)](https://consult.defra.gov.uk/reach-policy/extending-the-uk-reach-submission-deadlines/supporting_documents/UK%20REACH%20Article%201%20Consistency%20Statement%20English%20version.pdf) was also published alongside the consultation.

On the launch of the consultation, we informed stakeholders and invited those with an interest to participate. To increase awareness, especially among our target audience, we publicised the consultation on HSE's website and via the HSE e-Bulletin. We also raised awareness during the period of the consultation through internal meetings with interested parties.

Analysis of responses

Where feasible, a numerical estimate of those for and against each proposal has been provided alongside a breakdown of responses by sector. A qualitative thematic analysis of the open-ended responses was undertaken to identify the main issues, concerns, and themes emerging from stakeholder feedback. The analysis looked at the reasoning, evidence and examples provided, as well as the wider context of stakeholder feedback.

Where feasible, quantitative summaries have been included to indicate the proportion of respondents supporting or opposing particular options. However, the analysis primarily emphasised the content, context, and rationale of stakeholder views rather than a purely statistical tally. Responses were also disaggregated by sector, business size, and role under UK REACH, to provide insight into how different stakeholder groups may be affected by the proposals.

Overview of the respondents

A total of 210 responses to the consultation were received. 200 were submitted via the Citizen Space website and 10 via email. There was a good response to all the questions as illustrated in Figure 1. 9 of the 14 questions had a 100% response rate.

Figure 1: Response rate to each consultation question (Q1-Q14)

Question	Response rate (%)
Question 1	100%
Question 2	100%
Question 3	98%
Question 4	98%
Question 5	98%
Question 6	95%
Question 7	100%
Question 8	100%
Question 9	100%
Question 10	100%
Question 11	75%
Question 12	100%
Question 13	72%
Question 14	65%

A list of consultees who did not wish to remain anonymous is attached at Annex A. Interested parties were encouraged to respond via the consultation portal on Citizen Space, via e-mail or by surface mail.

Respondents by organisation

Figure 2: Number of respondents by organisation

Organisation	Total
Non-governmental Organisation (NGO)	3
Charity	1
Consultancy	10
Small or micro business (Less than 50 employees, including any global operations)	30
Medium business (50-249 employees, including global operations)	26
Large business (250 or more employees, including global operations)	101
Trade association	26
Industry association	6
Other	7

Stakeholder roles

Stakeholders were asked to identify their role under UK REACH, with the option to select multiple roles where appropriate. The responses highlight both the diversity of roles in the supply chain and the complexity of how organisations interact with chemicals regulation.

A significant proportion of stakeholders operate in international trade. The largest group identified as Importers from the EU/EEA, representing around two-thirds of respondents (65%). More than half (56%) also reported importing from the Rest of the World (RoW). Around 44% of respondents export to the EU/EEA and 41% to RoW, showing that GB businesses trade with a wide range of markets. Alongside trade, around 44% of respondents were Downstream Users, directly handling substances in the course of their business activities.

The data also shows variation in how narrowly or broadly organisations define their role. Around 18% of stakeholders identified a single role only, often as Only Representatives (ORs) or Downstream Users. However, a much larger proportion reported overlapping roles. For example, some stakeholders selected as many as 5 or 6 roles, indicating their involvement at multiple points in the supply chain. This suggests that regulatory changes may have wide ranging impacts across their operations, not confined to a single business function.

Analysis of the most common combinations reveals recurring patterns. Many organisations combined roles as Downstream Users and Importers, with 13 stakeholders reporting a dual role as Downstream User and Importer from EU/EEA, and 10 reporting Downstream User and Importer from the RoW. These combinations underline the interlinked nature of supply chains, where companies not only bring substances into GB but also process and use them directly.

Around 17% of stakeholders did not select any role. This may indicate uncertainty about their regulatory position, or that some respondents engaged in the consultation from a broader perspective (for example, trade associations or consultancies) rather than as dutyholders with direct legal responsibilities.

Figure 3: Distribution of respondents by role

Role	Number of respondents
Downstream user of chemical substances	128
Exporter of substances from GB to RoW	100
Exporter of substances from GB to the EU/EEA	117
Importer of substances and/or mixtures from RoW	141
Importer of substances and/or mixtures from Northern Ireland	26
Importer of substances and/or mixtures from the EU/EEA	182
Manufacturer of substances	80

Role	Number of respondents
Only Representative (OR)	73

Summary of responses

There was a total of 14 questions in the consultation document. The first 7 questions relate to the identity and role of the respondents and are reported on in the previous section. The responses received in relation to the specific questions (Q8 - Q14) raised in the consultation document are summarised below.

Question 8

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

Options:

- Do nothing
- Option 1 (27 October 2029, 27 October 2030, and 27 October 2031)
- Option 2 (27 April 2029, 27 April 2031, and 27 April 2033)
- Option 3 (27 April 2029, 27 April 2030, and 27 April 2031)

Stakeholders were asked in Question 8 to rank the 4 policy options in order of preference, with 1 being their most preferred and 4 their least preferred. The options presented were: Do nothing, Option 1, Option 2, and Option 3. This question was designed to capture stakeholders' overall preferences between maintaining the current deadlines or adopting one of the proposed extension options.

The consultation results show a majority preference for Option 2 (70% first choice), followed by Option 1 (23%). Option 3 attracted minimal support, and the “Do Nothing” option was strongly rejected.

Figure 4: Table of all rankings for Question 8

Rank	Do nothing	Option 1	Option 2	Option 3
1st (most preferred)	3	48	148	11
2nd	1	128	40	41
3rd	1	34	19	156
4th (least preferred)	205	0	3	2

Overview of various options

Do nothing

There was a strong rejection of the “Do nothing” option. Almost all respondents (98%) ranked it last, with only 3 respondents putting it first. Respondents consistently said this was unrealistic. They noted that the government and industry would not be ready, that the ATRm is not finalised, and businesses would face prohibitive costs and disruption to supply chains. The responses demonstrate a clear consensus that inaction is not a viable option and that stakeholders expect government intervention.

Option 1

Option 1 received moderate support as a first choice, with 23% of respondents ranking it first, but much stronger support as a second choice with 61%. No respondents ranked it last. While not the majority choice, many respondents acknowledged the benefits of Option 1. Several welcomed the later first deadline, which gives time for the ATRm to be finalised and published before obligations begin. Stakeholders who supported Option 1 recognised that it strikes a balance between providing industry with sufficient time and avoiding unnecessary delay to full UK REACH implementation. This suggests that while Option 1 is not the overall favourite, it is seen as a strong compromise or fallback position.

Option 2

Option 2 emerged as the preferred first choice with 70% ranking it first, and only 3 respondents ranked it last. It was the option which had the most respondents placing it in either first or second place. It was strongly favoured by small and micro (as well as medium-sized) businesses and trade associations.

Option 2 was seen as the most realistic and proportionate, as it maintains two-year intervals between deadlines. Respondents valued the ability to spread compliance costs, manage resources effectively, and learn lessons from earlier deadlines. Many argued that more time is needed given uncertainties around ATRm requirements, availability of consultants, and laboratory capacity. At the same time, NGOs expressed reservation about Option 2, considering that its 2-year intervals would unnecessarily prolong the period without safety data, undermining the ability of the regulator to act promptly on chemical risks. They also emphasised that any extension of deadlines should be accompanied by clear safeguards, such as prioritising the registration of the most hazardous substances at the earliest stage.

Option 3

Nearly three-quarters (74%) of respondents ranked option 3 third, with only 5% selecting it as their top choice. While it was not as strongly rejected as “Do nothing”, it was generally seen as a less attractive solution compared to Options 1 and 2. Industry respondents felt that the earlier April 2029 start together with the compressed one-year intervals across all bands were unmanageable and warned it would overstretch regulatory and industry capacity, risking rushed submissions and lower quality dossiers.

NGOs expressed clear support for Option 3, which they viewed as the most appropriate approach to ensure faster access to safety data and to close existing regulatory gaps. They considered that shorter intervals between deadlines would provide regulators with the information needed to better protect human health and the environment, while also giving government sufficient time to finalise an EU-aligned registration model.

Collectively, NGOs framed Option 3 as part of a broader vision for UK REACH: a regime that delivers timely data, aligns with EU standards, and ensures that health and environmental protections remain central to regulatory design.

Cross-cutting themes

Several cross-cutting themes emerged from across the respondents.

- Clarity and certainty: Respondents stressed the need for ATRm details before committing resources.
- Proportionality: Many argued that deadlines must reflect the scale of regulatory effort required.
- Competitiveness and growth: Respondents linked deadlines to wider economic pressures, warning that overly compressed timetables could drive businesses out of the UK market.

- Protection: NGOs and some respondents expressed concern that delays risk widening the gap with EU controls, while industry respondents generally argued existing EU REACH protections mean the extensions will not undermine safety.

Government response to question 8

The government notes the strong stakeholder support for Option 2, reflecting industry's desire for more time to prepare, spread costs, and adjust to the ATRm. However, having considered both consultation feedback and the underlying rationale, the government continues to regard Option 1 as the most proportionate way forward.

Option 1 provides sufficient time for government to finalise and legislate for the ATRm, while ensuring that transitional registration is not subject to unnecessary delay. To this end, Option 1 minimises any risk associated with not finalising the ATRm before the submission date. It also provides industry with more time than Option 2 to prepare and submit information on the most hazardous and highest tonnage substances.

Shorter one-year intervals between deadlines are justified because the ATRm would significantly reduce the information burden compared to EU REACH, and the original justification for 2-year intervals (time to negotiate access to EU data) is no longer relevant. Overall, this approach also ensures earlier availability of information overall for regulators, supporting timely interventions to protect human health and the environment.

In this way, Option 1 balances the need for regulatory certainty and proportionality with the government's overarching objectives of maintaining high standards of protection, minimising burdens on industry, and ensuring the ATRm is delivered in a timely and effective manner.

Subject to the consent of Scottish and Welsh Ministers, the UK government will be legislating to extend the current deadlines to 27 October 2029, 27 October 2030 and 27 October 2031.

Question 9

Please tick which tonnage bands apply to your business.

In Question 9, respondents were asked to indicate which tonnage bands under UK REACH applied to their business. This question aimed to help identify the range and scale of businesses responding to the consultation, and to

understand how views on the proposed options might vary according to the volume of substances manufactured or imported.

The dataset shows a clear predominance of large businesses, which account for over 100 responses and are spread across every tonnage band. Most notably, they cluster heavily in the “All” category (64), reflecting broad portfolios that cut across multiple substance volumes. They also appear most often in the highest band (1,000 tpa or more, with 19 entries), underlining their responsibility for the bulk of high-volume chemicals placed on the market.

Medium businesses (26 total) are more evenly distributed, with modest numbers across each band. Their presence is strongest in the “All” category (13) and ≥ 100 tpa (5), suggesting that while they are not as numerous as large firms, they still have significant exposure to mid- and high-volume registration duties.

Small and micro businesses (SMBs) (30 total) form a distinct group. They are most concentrated in the ≥ 100 tpa (10) and ≥ 10 tpa (7) categories but are also present in the “All” category (7). 5 SMBs fall into the $\geq 1,000$ tpa category, showing that some smaller operators manage very high-volume substances. This highlights the diversity of impact across SMBs with some handling modest portfolios while others deal with volumes comparable to much larger firms.

Most trade associations (26) and consultancies (10) selected the “All” category, reflecting their cross-sector roles in representing members or supporting clients across different tonnage ranges. Trade associations also appear in the high-volume $\geq 1,000$ tpa band (3), likely capturing the aggregated perspective of their members. Industry associations (6) follow a similar pattern, with small representation across “All” and mid-bands.

Finally, “Other” organisations (7) and 1 charity contribute smaller numbers, spread mainly across “All” and high-volume categories.

Government response to question 9

The government notes that a small number of SMBs reported operating at higher tonnage bands, including some handling substances at or above 1,000 tonnes per annum. This reflects the diversity of business models within the sector, with some SMBs managing larger portfolios or acting as importers for high-volume substances.

However, the majority of SMBs operate within the lower and mid-range tonnage bands, and overall, the evidence from the consultation does not indicate that the government’s preferred option (Option 1) would have a disproportionate or adverse impact on small businesses. Option 1 provides

sufficient flexibility and time for all registrants to comply with UK REACH requirements while ensuring that obligations remain proportionate and manageable.

Question 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 to human health and the environment.

In Question 10, respondents were asked to comment on how their preferred option for extending the submission deadlines might affect UK REACH's core objective of maintaining a high level of protection for human health and the environment. The aim was to understand whether stakeholders believed that additional time to submit data would have any material impact on the overall level of protection provided by the regime.

Most respondents considered that extending the UK REACH registration deadlines would not significantly undermine the aim of protecting human health and the environment. They explained that most substances are already registered under EU REACH and are in use on the GB market, meaning that safety data and risk management tools such as Safety Data Sheets, labelling, and Control of Substances Hazardous to Health regulations (COSHH) requirements should already be in place. Duty of care obligations also remain unaffected, ensuring that risk communication and management throughout the supply chain will continue during the transitional period.

Respondents highlighted that longer deadlines would help industry avoid rushed or poor-quality submissions. Additional time would allow businesses to organise portfolios, gather missing information, and prepare higher-quality dossiers, supporting long-term compliance. Regulators were also seen as beneficiaries, with more time available to finalise the ATRm and provide clarity on requirements.

A recurring theme was the importance of prioritising the most hazardous substances, particularly those in higher tonnage bands or with mandatory hazard classifications, even if deadlines are extended for other substances. Many respondents noted that such substances are already covered under EU REACH and will be addressed early under UK REACH timelines, helping to maintain strong protections.

Respondents pointed out that although the UK no longer has full access to EU dossiers, publicly available EU data and ongoing ECHA assessments, such as

those provided through the Public Activities Coordination Tool (PACT) and Assessment of Regulatory Needs (ARN), still offer a robust baseline for safety decisions. This was cited as reassurance that health and environmental protection will continue to be upheld during the transitional period.

NGOs viewed Option 3 as the most effective for ensuring timely access to safety data and upholding UK REACH's aim of maintaining a high level of protection for human health and the environment. NGOs emphasised that extended deadlines should only be allowed if accompanied by robust risk mitigation measures and a clear plan to deliver a cost-effective and EU-aligned model. They also called for prioritisation of data on the most hazardous substances, recommending that the first submission deadline capture all substances with mandatory hazard classifications, regardless of tonnage.

Government response to question 10

The government notes the broad view among respondents that extending deadlines will not compromise the UK REACH objective of protecting human health and the environment. Existing legal duties, including the provision of Safety Data Sheets, labelling and COSHH obligations, should continue to ensure that safety information is communicated effectively. The government agrees that additional time will support the preparation of higher-quality registration dossiers and will enable the completion of the ATRm, and that this would apply to all 3 options.

We also acknowledge the importance placed by respondents on ensuring that the most hazardous substances are prioritised. The government will maintain this focus, ensuring that these substances are addressed at the earliest stage while continuing to uphold high levels of protection for human health and the environment throughout the transitional period.

Question 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.

In Question 11, respondents were asked to provide any views or evidence on potential cost impacts to either the chemical industry or consumers of extending the submission deadlines while the ATRm is being finalised. The aim was to gather any supporting evidence or data to inform the government's assessment of overall cost implications.

The feedback was almost entirely qualitative. Most responses consisted of broad statements such as “no impact”, “spread the cost”, “uncertain” or “increased burden”. No respondents provided quantified cost estimates, ranges, or detailed breakdowns, although one small business estimated the cost of a 1–10 tonne dossier at £12,000 excluding registration fees. Several stakeholders, particularly downstream users, explicitly stated that they had “no visibility on costs” or “did not know” how to assess the impact.

A number of themes emerged from our analysis. First, uncertainty and lack of visibility featured prominently, with many noting that the downstream effects on consumers were especially difficult to predict. Second, some respondents stated that there would be no or minimal cost impact, reasoning that extending deadlines only shifts the timing of compliance rather than altering the overall burden. Third, others suggested that extensions could help by spreading costs over a longer period, making them more manageable, especially for small or micro and medium sized businesses. Alongside this, a smaller group pointed to potential benefits and savings, arguing that extra time reduces immediate financial pressure and allows firms to prepare more efficiently. However, some respondents raised the opposite concern: that delays could prolong uncertainty, slow compliance, or even stifle competitiveness, thereby leading to higher costs in the long term.

The responses from small and micro businesses (18 in total) mirrored many of these themes but added further nuance. Several SMBs welcomed extensions as a way to spread costs more evenly, helping them manage compliance without sudden spikes and allowing them to maintain their product portfolios. A number linked the benefits directly to current economic pressures, noting that extensions would ease financial strain in a challenging environment and provide certainty while the ATRm is finalised.

A few SMBs reported that the impacts would be minimal or that costs would simply be deferred, while others highlighted risks, including the possibility that some overseas suppliers might withdraw from the UK market, leaving SMBs facing higher costs or reduced availability of products. A minority admitted they could not assess the consumer impact at all, reflecting broader uncertainty across the supply chain.

References to consumers and downstream users appeared frequently across all respondents. Many noted that it was unclear how costs might flow through supply chains to end users. Larger businesses tended to focus on spreading costs while noting ongoing uncertainty. SMBs placed emphasis on manageable timelines but were less clear about consumer impacts. Trade associations and consultancies highlighted ongoing uncertainty and effects on downstream users. In contrast NGOs stressed risks rather than potential cost impacts.

Overall, responses presented a mixed picture on cost impact. Some stakeholders expected little or no cost, others foresaw additional burdens, while a notable share viewed extensions as an opportunity to spread or even reduce costs. The dominant theme was uncertainty, particularly regarding downstream effects on consumers.

For SMBs in particular, spreading costs across longer timelines was seen as critical to easing financial pressures and ensuring portfolio stability, though concerns remained about competitiveness, supplier withdrawal, and gaps in visibility. Crucially, no respondents beyond one SMB provided quantitative cost evidence, meaning the analysis remains reliant on qualitative insights and perception-based impacts.

Government response to question 11

The government notes that stakeholders provided a wide range of views on potential cost impacts, but that no substantive quantified cost evidence was submitted. We acknowledge the concerns raised around uncertainty, especially for downstream users and consumers, and recognise that visibility of costs remains limited at this stage. We also note the view expressed by many respondents, including small and micro businesses, that extended deadlines could help spread costs and ease compliance pressures, while others cautioned about the risks of prolonged uncertainty and potential impacts on competitiveness. Overall, this means the consultation responses do not provide a strong basis for favouring one option over another.

The government will continue to work closely with businesses of all sizes to build a clearer understanding of potential cost impacts, including those affecting downstream users and consumers. The government remains committed to ensuring that the final ATRm policy balances the need to protect human health and the environment with an approach that is proportionate, manageable and sustainable for industry.

Question 12

Do you agree with the government's proposal, as set out in Part 1, to move the current compliance check deadlines so that they align with the proposed submission deadlines? - Please explain the reasons for your answer.

Respondents were asked whether they agreed with the government's proposal to move the current compliance check deadlines so that they align with the

proposed submission deadlines. The quantitative results show overwhelming support for the proposal, as illustrated in figure 5:

Figure 5 – responses to question 12

Response	Count	Percentage
Yes	197	94%
No	13	6%
Total	210	100%

The qualitative comments reinforce this pattern. Many respondents welcomed alignment as a logical and consistent approach, avoiding confusion and ensuring that businesses are not penalised for non-compliance before data is formally submitted. A common theme was that compliance checks should only take place when complete datasets are available, otherwise there is a risk of assessing incomplete or disputed dossiers. Respondents also highlighted the benefits of regulatory stability, fairness and predictability during the transitional period, particularly while the ATRm is still being finalised.

Several stakeholders noted that regulators would face resourcing challenges under the current deadlines and that moving the dates would allow checks to be conducted more effectively. A small minority of respondents opposed the proposal, arguing that extending deadlines would further delay scrutiny and reduce the timeliness of regulatory oversight. However, these views were not widely shared.

Government response to question 12

The government notes the strong support for aligning compliance check deadlines with revised submission deadlines. We agree that this approach will ensure consistency, prevent premature assessments of incomplete data, and support businesses in meeting their obligations fairly. Aligning the deadlines will also help regulators manage workloads more effectively and ensure compliance decisions are based on robust and complete information.

The government acknowledges the concerns raised by a small number of respondents about the potential for delay and reduced oversight if compliance check deadlines are moved. However, it is both necessary and practical to align the compliance check deadlines with the revised submission deadlines. Compliance checking is directly dependent on the availability of registration data; therefore, once the submission deadlines are extended, the associated compliance check timelines must also move to remain workable. This

approach allows compliance checks to be carried out on accurate dossiers and ensures that the HSE can plan and manage available resources effectively within the revised framework.

Question 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.

Respondents were asked for their views on how compliance checks should be scheduled in relation to the revised submission deadlines. A total of 154 responses were received.

Several suggested that compliance checks should begin approximately one year after each submission deadline, to give both industry and regulators sufficient time to process submissions before checks commence.

A recurring theme was the importance of prioritisation. Many respondents felt that compliance checks should first target higher-risk substances, such as those in higher tonnage bands or with hazardous properties, with lower risk or lower volume substances addressed later. Some also recommended a phased or staggered approach, reflecting existing legislative practice, with compliance checks taking place one, 2, and 5 years after the relevant registration deadline. This was seen as a fair and pragmatic approach that would allow regulators to manage workloads efficiently while ensuring scrutiny is applied across all registrations over time.

Concerns about resourcing were raised by a number of respondents. They stressed that scheduling must reflect the regulator's operational capacity, otherwise checks could risk becoming inconsistent or ineffective. A small number of respondents expressed frustration at further delays, arguing that compliance checks should be applied as soon as possible to maintain regulatory pressure.

Government response to question 13

The government notes the strong stakeholder support for aligning compliance check deadlines with the revised submission deadlines and agrees that this is the most consistent and fair approach. We recognise the importance of ensuring that compliance checks are carried out on complete dossiers, and that industry has clarity about the timelines it must work to.

In line with Article 41(5) of UK REACH, which requires that at least 20% of registration dossiers are subject to a compliance check, the government intends to ensure that this obligation continues to be met. To achieve this, compliance checks will follow a 1, 2, and 5-year schedule after each submission deadline. This replicates the current legislative model and reflects stakeholder views that a phased approach provides both fairness and predictability. It will also ensure that compliance checks remain proportionate, with earlier checks focused on higher tonnage and higher hazard substances, while allowing time for registrants to prepare robust submissions for Candidate List substances.

Question 14

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

There were 111 responses to Question 14. These were entirely qualitative and varied widely in scope, but several common themes emerged across industry, associations, NGOs, and individual businesses. Many respondents used this question to reiterate concerns about uncertainty, duplication of effort, and the future design of the ATRm, while others highlighted structural issues such as UK–EU divergence, supply chain barriers, and the need for regulatory clarity and support for both small or micro and medium sized businesses.

Key themes

- Uncertainty around ATRm A dominant theme was ongoing concern about the lack of clarity on the final structure and requirements of the ATRm. Respondents stressed that prolonged uncertainty makes it difficult for companies to plan effectively, allocate resources, and measure potential obligations. Several called for the government to provide certainty as soon as possible, with clear guidance, practical tools, and training, particularly for small or micro and medium sized businesses navigating UK REACH for the first time.

- Duplication of data and costs Many respondents criticised the duplication of registration obligations under UK and EU REACH. Businesses argued that where data already exists under EU REACH, requiring resubmission for UK REACH adds unnecessary costs and administrative burden. Some explicitly called for the UK to recognise existing EU REACH registrations or explore mechanisms for data-sharing that aim to reduce duplication and allow resources to be redirected towards innovation.

- UK–EU divergence and market barriers Industry bodies and trade associations repeatedly flagged that divergence between UK and EU REACH creates barriers to trade, competitiveness, and supply chain integration. Respondents argued that 2 parallel systems, even if technically identical, create additional burdens without delivering corresponding health or environmental benefits. Several suggested that closer alignment with the EU, possibly through a “Swiss-style” arrangement, would be more efficient and sustainable.
- Supply chain challenges and DUIN issues

Some respondents raised practical challenges around the DUIN (Downstream User Import Notification) system. Businesses stated that they are restricted from importing substances in quantities above 999 kg per year unless the substance was previously imported by them during the qualifying 2-year DUIN window. They argued that this restricts growth, reduces competitiveness, and can force businesses to limit imports below regulatory thresholds. Calls were made for a review of DUIN eligibility rules to ease supply chain pressures.

- Need for proportionate regulation and innovation support A number of respondents highlighted that excessive requirements risk stifling innovation and limiting new product introductions to the GB market. They urged the government to adopt a risk-based, proportionate approach, with particular care given to SMBs. Some argued for exemptions or simplified procedures for substances already registered in the EU, stressing that duplication delivers little added protection.
- Calls for improved communication and support Respondents emphasised the need for earlier and clearer communication of regulatory changes, with sufficient lead time to prepare. Guidance, training, and practical tools were repeatedly mentioned as necessary to support compliance, especially for smaller businesses.

Responses to Question 14 underscore widespread concerns about uncertainty, duplication, and divergence from the EU in the current UK REACH framework. While many welcomed the extension of deadlines as pragmatic, stakeholders pressed for urgent clarity on the ATRm, a more proportionate approach to data requirements, and action to address trade and supply chain barriers created by divergence from EU REACH. SMBs in particular emphasised the need for manageable obligations, practical guidance, and support to remain compliant.

Next steps

The government welcomes the responses received to this consultation and is grateful to all stakeholders who contributed their views. We have carefully considered the evidence and comments provided on the proposed options to extend the submission deadlines, including the ‘do nothing’ option. Overall, respondents supported the government’s assessment that extending the deadlines under either Option 1 or Option 2 would have negligible impact on the high levels of protection for human health and the environment under UK REACH.

Having considered the balance of evidence, the government concludes that Option 1 provides the most proportionate approach. The additional time it offers will help to reduce burdens on small and micro businesses and downstream users, while still ensuring that data becomes available in a timely and orderly way. The UK government therefore intends, subject to the consent of Scottish and Welsh Ministers, to bring forward legislation extending the UK REACH submission deadlines, moving them from 27 October 2026, 2028, and 2030 to 27 October 2029, 2030, and 2031.

The government also intends to legislate, subject to the consent of Scottish and Welsh Ministers, to align the statutory compliance check dates under Article 41(5) with the new submission deadlines. This will ensure that compliance checks are carried out only after data has been submitted, maintaining fairness for registrants and supporting effective regulatory oversight.

The revised legislation will be brought forward in 2026, following the usual parliamentary process, to ensure that the new deadlines and compliance arrangements take effect in good time ahead of the first extended deadline in October 2029.

Appendix A: List of responding organisations

Below is a list of consultees who responded to this consultation and did not request anonymity.

- 2M Group
- 3M United Kingdom PLC
- ACRE Consultancy
- Agricultural Industries Association

- Air Liquide UK Ltd
- Airedale Chemical Company Limited t/a Airedale Group
- Airedale Group
- AkzoNobel
- Alfa Chemicals Limited
- Aluminium REACH Consortium
- Angus Horticulture Limited
- Aquaspersions Limited
- Association of British HealthTech Industries (ABHI)
- Azelis Life Sciences
- Azelis UK & Ireland
- Baerlocher UK Ltd
- Baker Hughes
- BASF plc
- Biachem Ltd
- Blue Frog Scientific Limited
- BOC Ltd
- Brenntag UK & Ireland Limited
- Brineflow Limited
- British Adhesives & Sealants Association (BASA)
- British Aerosol Manufacturers' Association
- British Chemicals Association (BCA)
- British Coatings Federation
- British Pest Control Association (BPCA)
- British Plastics Federation (BPF)
- British Retail Consortium (BRC)
- Caroline Raine Chemical Consultancy Limited
- Celtic Chemicals
- CHEM Trust
- Chemical Business Association
- Chemical Compliance Advisory Services Limited

- Chemical Industries Association
- Christeyns
- Cobalt Institute
- CropEnergies AG with affiliates in the UK and EU
- Dakram Materials Ltd
- Diversey UK Ltd
- Domino UK Limited
- Dr Knoell Consult Ltd.
- dsm-firmenich
- edding UK Ltd.
- EOSCA - The European Oilfield Speciality Chemicals Association
- Essar Oil UK Limited
- Etex Building Performance Ltd
- European REACH Grease Thickeners Consortium
- Evonik Chemicals Ltd.
- Fidra
- Flexsys Chemicals Belgium NV
- Fuels Industry UK Ltd.
- GEELIO Umwelttechnologie GmbH
- Georg H. Luh Farben- und Chemikalien Großhandelsges. mbH
- Givaudan
- Glasson Grain Limited
- Hardie Polymers Ltd
- Henkel
- HOS-Technik GmbH
- Hubergroup UK
- Huntsman Corporation
- Innospec Limited
- ICL Europe Cooperatief U.A. (ICL-Group)
- International Fragrance Association (IFRA)
- Ironsides Lubricants

- James Durrans & Sons Ltd
- Japan Business Council in Europe
- Kemira
- Kluthe UK Ltd
- Knauf (UK) GmbH
- Lake Chemicals and Minerals
- LANXESS Solutions Uk Ltd
- Lead REACH Consortium
- Lyondellbasell (LYB)
- Make UK
- Mallard Consulting Ltd
- Marubeni
- MegaChem (UK) Ltd.
- Megara Resins S.A.
- Merck KGaA
- Metaflake Limited
- Mexichem UK Limited
- Mineral Products Association Ltd
- Mineral Wool Insulation Manufacturers Association (MIMA)
- Mitsubishi Chemical Methacrylates
- Morgan Advanced Materials
- Nice-Pak International
- Nobel NC CO Ltd
- Non-Ferrous Alliance
- Nordmann UK Limited
- Norkem Holdings PLC
- NOTEDOME LIMITED
- Nouryon
- Pearl Chemicals
- Phillips 66 Limited
- Picon Limited

- Plastrribution Limited
- Polynt Composites UK Ltd
- Polynt UK Ltd
- Prayon S.A
- Protex Chemicals Ltd
- Quintessence Fragrances Limited
- Rain Carbon Germany
- Reckitt (Reckitt Benckiser/RB)
- RENOLIT UK Limited
- RETORTE GmbH Selenium Chemicals & Metals
- RS Clare & Co. Ltd
- S C JOHNSON LTD & ECOVER (UK) LTD
- Saint-Gobain construction products UK trading as British Gypsum
- SC Johnson Professional Ltd
- Sherwin Williams
- Sika Limited
- SLB
- Solenis Industries UK Ltd, Solenis UK Ltd
- Solvay SA
- SSE
- STEPAN UK Ltd
- Syngenta Crop Protection AG (on behalf of Syngenta Ltd. and Syngenta UK Ltd.)
- Synthomer (UK) Ltd
- SZ
- Tennants Distribution Limited
- The Association of Manufacturers and Formulators of Enzyme Products (AMFEP)
- The Cosmetic, Toiletry and Perfumery Association (CTPA)
- The International Fragrance Association UK (IFRA UK)
- The SPB GLOBAL CORPORATION S.L.
- Thomas Swan & Co. Ltd.

- Thor Specialities (UK) Ltd
- TIB Chemicals AG
- Tilley Distribution UK Ltd
- TopBlue Ltd
- Trinseo
- UK Cleaning Products Industry Association (UKCPI)
- Unilever UK Ltd
- Uniper UK Limited
- United Kingdom Lubricants Association
- Vale Europe Limited
- Wildlife and Countryside Link (WCL)
- Wilfrid Smith Ltd
- WSP UK Ltd.
- Wychem LTD
- Yara UK Ltd
- Zeller+Gmelin GmbH & Co. KG
- Zotefoams plc
- Zschimmer & Schwarz Italiana S.p.A.



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