



UK REACH

Key Updates & Actions for Compliance



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Introduction

As part of our commitment to keeping members informed on critical regulatory developments, we are sharing the latest updates on UK REACH compliance. These changes are vital for ensuring your business aligns with the evolving requirements following Brexit. This document provides an overview of UK REACH deadlines, the role of the Aluminium REACH Consortium, and steps you may need to take to ensure compliance.

For more detailed information, please follow the links provided or contact ALFED for additional support.

UK REACH Overview

- Since Brexit, UK REACH applies exclusively to UK-based legal entities, while EU REACH continues to impact EU-based entities.
- REACH regulations are substance-based, applying to materials like aluminium, aluminium oxide, and aluminium hydroxide and alloying elements and alloys.
- REACH is applicable to substances not specific forms such as billet or slab that will be incorporated into end products.
- Businesses must evaluate their role in the supply chain (e.g., manufacturer, importer, or downstream user) and determine if registration is required.
- UK REACH deadlines have been postponed, with the first deadline now set for 2026.

Updated Deadlines for UK REACH

- **October 2026:** For substances of 1,000+ tonnes per annum or classified as the most hazardous.
- **October 2028:** For substances of 100–1,000 tonnes per annum.
- **October 2030:** For substances of 1–100 tonnes per annum.

Aluminium REACH Consortium Update

- The **EU Lead Registrants (LRs)** for aluminium, aluminium oxide, and aluminium hydroxide and alloying elements have confirmed they will **not register** under UK REACH.
- EU consortium members planning to register will not assume LR roles.
- The consortium will only provide data for registration; UK registrants must organise and submit dossiers independently.
- There is limited visibility regarding UK-based entities intending to register.
- Businesses relying on “grandfathered” EU REACH registrations must ensure these are properly maintained under UK REACH.

Practical Examples of UK REACH Application

- A UK-based manufacturer of primary aluminium selling to domestic markets.
- An importer bringing aluminium products into the UK from the EU.
- A downstream user relying on imported aluminium oxide for processing.

These scenarios illustrate where members might need to assess obligations under UK REACH.

Steps for Registration

The registration process involves the following:

- Agreeing on data needs and generating a registration dossier.
- Nominating a **Lead Registrant (LR)** to submit the dossier and act as the main point of contact with the UK Health and Safety Executive (HSE).
- Using the HSE's "**Comply with UK REACH**" online system for registrations.

Actions for ALFED Members

Awareness and Readiness:

- Assess your obligations under UK REACH and assume registration is required unless confirmed otherwise.
- Stay informed via the UK REACH Helpdesk: ukreach.clpe@hse.gov.uk.

Collaboration and Planning:

- ALFED will share updates among potential UK registrants to agree on a coordinated plan and timeline.
- Consider engaging with ALFED to ensure your business is prepared for the first registration deadline in 2026.

Resources and Support:

- Visit the HSE's dedicated UK REACH page for detailed guidance: [HSE REACH Overview](#).
- Participate in ALFED initiatives, such as surveys or LinkedIn polls, to share your readiness status and help shape our support efforts.

Frequently Asked Questions (FAQs)

- **What is the role of the Lead Registrant (LR), and why is it important?** The LR is responsible for submitting the main registration dossier to HSE on behalf of all registrants for a specific substance.
- **What happens if my supplier does not register under UK REACH?** Businesses will need to register the substance themselves or find an alternative supplier.
- **How can I access or contribute to shared data for registration?** Contact the Aluminium REACH Consortium or relevant trade bodies for data-sharing agreements.
- **Does my company need to register substances that are components of alloys?** Registration depends on the specific chemical composition and whether the substance is considered a preparation under UK REACH.

Consequences of Non-Compliance

- Non-compliance with UK REACH can result in fines, restrictions on market access, and disruptions to supply chains. Ensure your business takes early steps to mitigate risks.

A Final Note

Compliance with UK REACH is an ongoing process, and ALFED is here to support our members every step of the way. Together, we can navigate the complexities of these regulations and ensure the aluminium industry remains competitive and sustainable.

For further assistance or to discuss your compliance strategy, please contact ALFED directly.



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