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UK REACH UPDATE

22nd Dec 2025 – Breaking News!



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Summary

As 2025 draws to a close, there have been no major announcements from DEFRA or the UK HSE regarding UK REACH since the summer consultation on extending transitional registration deadlines – until today. On 22nd December 2025, the UK Government published its official response confirming that the current deadlines will be extended and setting out the new timetable for transitional arrangements.

The Alternative Transitional Registration model (ATRm) remains under review, and industry continues to await clarity on the data requirements and legislative changes needed to implement it. While 2025 has been a year of waiting, businesses should use this time to review supply chains, ensure SDS compliance, and prepare for eventual ATRm requirements.

This newsletter therefore provides an overview of UK REACH as it stands today, including the newly announced deadlines, a recap of the regulatory framework, and key areas of divergence from EU REACH.

UK REACH – Where are we now?

UK REACH came into force on 1 January 2021 following the UK's departure from the EU. It applies in Great Britain (England, Scotland, Wales), while Northern Ireland remains under EU REACH under the Windsor Framework.

The regulation covers:

- **Registration** of substances manufactured or imported into GB.
- **Evaluation** of dossiers and substances.
- **Authorisation** for substances of very high concern (SVHCs).
- **Restriction** of substances posing unacceptable risks.

Since Brexit, UK REACH has begun to diverge from EU REACH, particularly in areas such as SDS requirements, CLP classifications, and fee structures.



Transitional registration deadlines recap

The transitional registration process has been repeatedly extended to allow time for the ATRm to be developed.

- **Original deadline:** October 2021 (single date).
- **Revised phased deadlines (2020):** October 2023, 2025, 2027.
- **Extended deadlines (2023):** October 2026, 2028, 2030.
- **DEFRA consultation (Summer 2025):** Proposed further extensions, with the preferred option being October 2029, 2030, 2031.

The consultation closed in September 2025, and results were expected in early 2026 — but the government has now published its response.



Government announces new transitional deadlines

On 22 December 2025, Defra published its long-awaited response to the consultation on extending the UK REACH transitional registration submission deadlines. The government has confirmed that it will legislate — subject to Scottish and Welsh Ministerial consent — to adopt Option 1, setting the **new transitional registration deadlines** as:

- 27 October 2029
- 27 October 2030
- 27 October 2031

These replace the current deadlines of 2026, 2028 and 2030.

The full announcement on the consultations outcome can be found here:

<https://www.gov.uk/government/consultations/uk-reach-extending-dossier-submission-deadlines-for-transitional-registrations/outcome/summary-of-responses-and-government-response>

Why Option 1?

Although Option 2 was strongly favoured by industry (70% ranked it first), the government concluded that Option 1 is the most proportionate approach because it:

- provides sufficient time to finalise and legislate for the ATRm
- avoids unnecessary delay to full UK REACH implementation
- ensures earlier availability of hazard and exposure information for regulators
- reflects that ATRm will significantly reduce information requirements compared with EU REACH

Compliance check timelines also extended

The government will also amend the statutory deadlines for HSE to complete compliance checks on at least 20% of dossiers. These will now be aligned with the new submission dates.

What this means for businesses

- The pressure of the 2026 deadline is lifted
- A clearer planning horizon now extends to 2031
- ATRm details are still awaited, but Defra confirms that final data requirements will not exceed those outlined in the 2024 ATRm consultation
- Companies should continue preparing by reviewing supply chains, confirming substance portfolios, and ensuring SDS/CLP compliance

UK REACH Fees – What changed in 2025?

From 1 April 2025, DEFRA introduced a flat standard registration fee of £2,222, with discounts for SMEs. This replaced the tonnage-based fee structure and is estimated to save industry £40m over six years.

Additional fees now apply for tonnage updates, PPORD notifications, and authorisations.

SDS and CLP Divergence – A refresher

- **Safety Data Sheets (SDS):**
UK REACH SDS requirements are based on Annex II of Regulation (EU) 2015/830. The EU has since updated its SDS format under Regulation (EU) 2020/878, which was not retained in GB. Businesses supplying both markets must ensure GB-specific supplier details are included.
- **CLP Classification:**
EU CLP and GB CLP have diverged since 2021. New EU hazard classes and harmonised classifications are not automatically adopted in GB. Suppliers in GB must continue to comply with the GB Mandatory Classification List (MCL).



Looking ahead to 2026

- Defra will legislate to implement the new transitional deadlines.
- Further detail on the ATRm design is expected, clarifying data requirements for industry.
- Potential revisions to GB CLP may be considered, though changes are unlikely before 2026.

