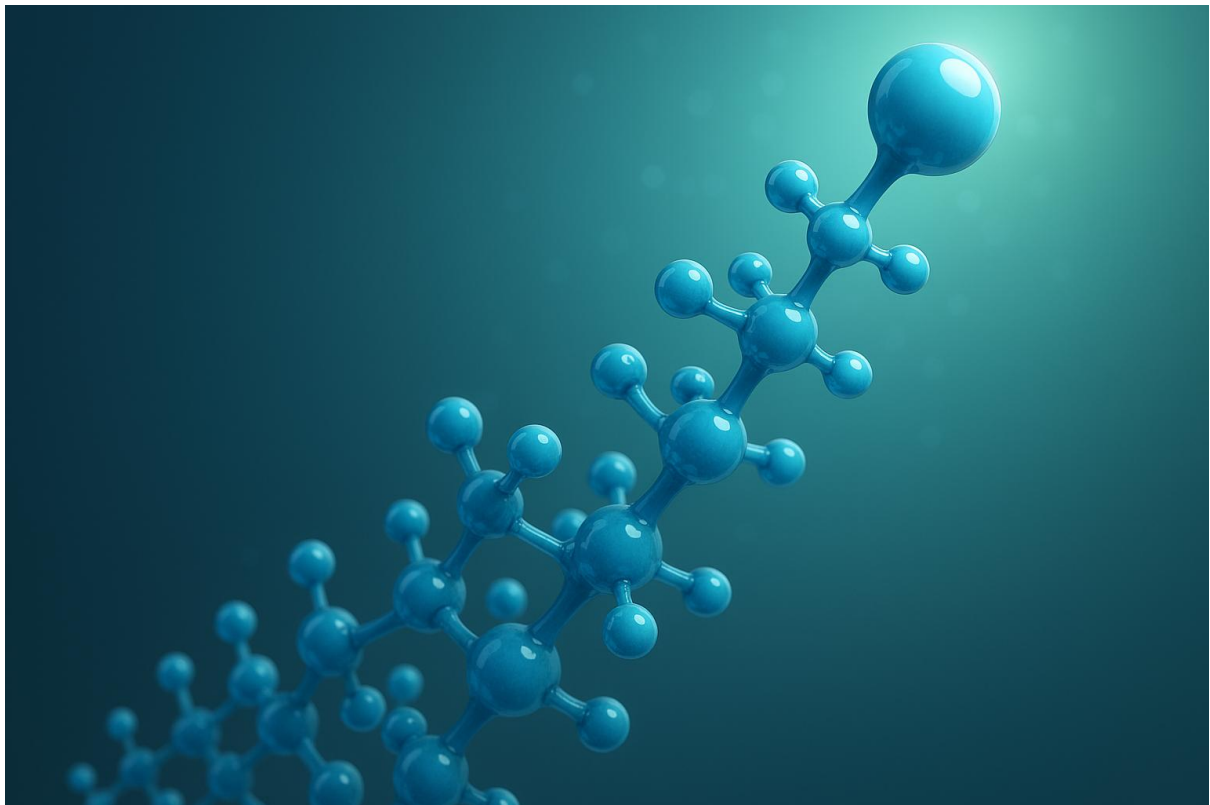


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UK REACH UPDATE SPRING 2026



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Summary

On 30th March 2026, the UK Government **confirmed** a fundamental change in how transitional registrations under UK REACH will work, significantly reducing upfront data burdens for many businesses.

In its formal response on the ATRm (Alternative Transitional Registration model), it confirmed a more proportionate, phased approach to transitional registrations under UK REACH. This marks a **significant** shift away from replicating full EU REACH dossiers and moves toward a risk-based, targeted information model.

The full response is available here:

<https://www.gov.uk/government/consultations/an-alternative-transitional-registration-model-atrm-for-uk-reach/outcome/summary-of-responses-and-government-response>

Rather than mirroring the full EU REACH dossier requirements, the ATRm introduces a more proportionate, phased approach. Companies will provide a streamlined set of information at the point of transitional registration, with the regulator able to request additional detail only where it's genuinely needed.

In our view, the ATRm provides welcome regulatory certainty, but companies should not underestimate the importance of robust hazard conclusions.



What the ATRm means in practice

The ATRm changes *what* companies must submit at the point of transitional registration and *when* additional information may be required. Instead of demanding complete hazard datasets upfront, the model introduces a staged approach.

Upfront information will now include:

- **Hazard conclusions** rather than full study reports
- **Existing use and exposure information**, with no requirement for GB-specific expansion
- **A targeted chemical safety report**, with full risk assessment only where necessary
- **Participation in substance groups** to support data sharing and joint submissions

This reduces the immediate burden on registrants while still giving the regulator visibility of key risks.



What the HSE Can Still Request

Although the ATRm streamlines initial submissions, the HSE retains the authority to request further information where justified.

This may include:

- Full hazard datasets
- Additional exposure information
- More detailed risk assessment data

These requests will be **case-by-case**, not automatic.

Why This Matters

The ATRm represents a pragmatic shift in UK REACH implementation. It aims to:

- Reduce unnecessary duplication of EU REACH data
- Lower costs for businesses
- Maintain protection of human health and the environment
- Improve the efficiency of regulatory oversight

For companies holding transitional registrations, this means planning for a **phased compliance strategy** rather than a single large data submission.



What Businesses Should Do Now

- Review high-level hazard conclusions and existing exposure/use information to ensure that is up-to-date and relevant
- Monitor HSE guidance on substance groups and data-sharing expectations

Although full hazard datasets are no longer required upfront, companies should ensure their existing data is organised, defensible, and ready to support future HSE requests .

We will continue to track developments and provide updates as the HSE publishes further guidance.

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 government has confirmed that it will legislate this year — subject to Scottish and Welsh Ministerial consent — to set the **new transitional registration deadlines** as:

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

These dates will replace the currently legislated deadlines of 2026, 2028 and 2030.

No immediate action is required in relation to deadlines, but companies should update internal compliance timelines accordingly.