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UK REACH UPDATE SUMMER 2026



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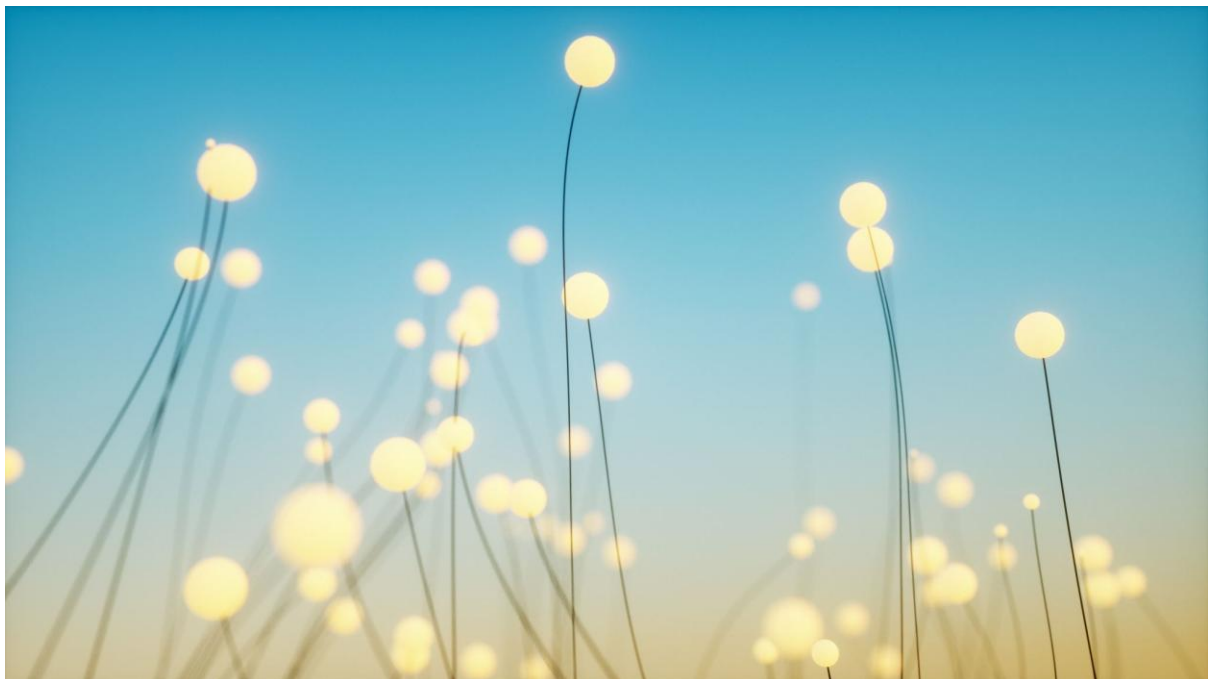
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Summary

Welcome to the Summer 2026 edition of UK REACH News, where we summarise the latest regulatory developments and what they mean for your business.

It has been a busy quarter for UK REACH. Since our Spring update, three developments have moved from proposal to reality: the transitional registration deadlines are now set in law, the HSE has made one of its largest single additions to the Candidate List since Brexit, and industry has begun pushing back publicly on the workability of the Alternative Transitional Registration model (ATRm).

None of these change what you need to do today, but each has practical implications worth factoring into your compliance planning. We cover all three below, along with our view on what they mean in practice.



Deadlines Now Confirmed in Law

On 16 July 2026, the UK government formally published the REACH (Amendment) (No. 2) Regulations 2026 (SI 2026/849). This puts into law the new extended transitional REACH registration deadlines:

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

The regulations enter into force on 6 August 2026 and apply to England, Wales and Scotland. This is the legal confirmation of the timetable we reported in our Spring update — it is no longer a government intention, but a statutory deadline.



Why this matters:

With the deadlines now fixed in legislation, the immediate pressure of the original October 2026 date is formally lifted. However, this should not be read as an invitation to delay preparation — the ATRm's detailed data requirements are still being finalised, and companies that wait until the new deadlines approach may find themselves competing for limited data and consultancy capacity.

HSE Adds New SVHCs to the Candidate List

On 15 June 2026, the UK HSE added 15 new Substances/Groups of Very High Concern (SVHCs) to the UK REACH Candidate List — one of the largest single-batch expansions since Brexit. This follows DEFRA's February 2026 statement confirming its intention to align the UK SVHC list more closely with the EU list.

<https://www.hse.gov.uk/reach/svhc-overview.htm>

For producers and importers of articles, a notification duty to the HSE applies where both of the following conditions are met:

- The substance is present in the article at a concentration greater than 0.1% w/w, and
- The substance is present in quantities totalling more than one tonne per producer or importer per year.

Where notification is required, it must be submitted within six months of the substance's addition to the list.

Why this matters:

If your portfolio includes articles, rather than only substances or mixtures, this is worth a proactive check now rather than at the six-month deadline. We are happy to help review your substance portfolio against the updated Candidate List.

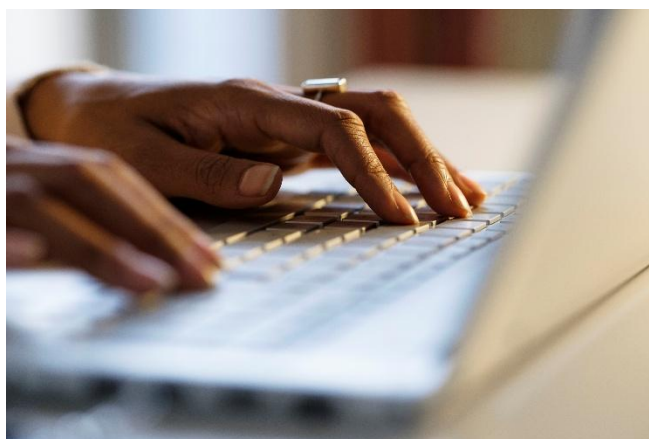


ATRm: Industry Reaction and What it Means for You

Trade bodies have generally welcomed the extra time created by the deadline extension, but several — including BASA, the Adhesives and Sealants Association — have renewed concerns that the ATRm, as currently designed, does not reflect how industry actually sources, formulates and shares substance data, and risks placing disproportionate cost and administrative burden on smaller manufacturers.

In our view, this tension is worth watching closely. The ATRm's stated aim — reducing upfront data burdens through a risk-based, targeted information model — is a genuine improvement in principle. But the HSE retains full discretion to request further hazard, exposure and risk assessment data on a case-by-case basis, so a lighter initial submission does not remove the underlying need for a defensible, well-organised data package. Businesses that treat the ATRm as a reason to do less groundwork, rather than more targeted groundwork, may find themselves exposed when a compliance check is triggered.

We will continue to track how this debate develops as HSE guidance is published.



What Businesses Should Do Now

- Note the new statutory deadlines in your internal compliance planning — 27 October 2029 / 2030 / 2031, phased by tonnage and hazard profile.
- Check your article portfolio against the newly listed SVHCs and calculate whether the notification threshold is met.
- Continue organising existing hazard, use and exposure data so it is defensible and ready to support future HSE requests, regardless of how the final ATRm data requirements land.
- Map your supply-chain data dependencies.
- Get in touch if you would like a portfolio review ahead of the new deadlines — with several years' runway now confirmed, this is a good time to plan a phased approach rather than a last-minute push.

As always, we will keep tracking developments and will update you as the HSE publishes further ATRm guidance.

