REACH Ready Review

Issue 67: Autumn 2026

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EXTENDED 27 October 2029 27 October 2030 27 October 2031 DEADLINE

UK REACH Registration deadlines extended

The long-awaited extension to the UK REACH registration deadlines has been formally adopted, providing government with additional time to finalise the Alternative Registration model for transitional substances (ATRm). The legislation entered into force on 6 August 2026 and extends the registration deadlines to 27 October 2029, 27 October 2030 and 27 October 2031. The amendment also adjusts the deadlines for HSE compliance checks under Article 41.

The extension follows extensive engagement by industry and comes at a time when significant concerns remain over the cost of registration, access to data and intellectual property rights associated with generating registration dossiers. Earlier in July, the House of Lords debated the draft Statutory Instrument extending the deadlines, with parliamentarians recognising the importance of providing additional time while longer-term solutions for UK REACH continue to be considered.

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Defra launches technical consultation on UK REACH ATRm legislation

Defra has launched a six-week technical consultation on the draft legal provisions intended to implement the Alternative Transitional Registration model (ATRm) under UK REACH. The consultation, published on 24 September, closes at 11:45pm on 10 November 2026. It was initially expected to run for four weeks but was extended by two weeks following representations from industry associations.

The ATRm is intended to provide a more proportionate framework for registering transitional substances while maintaining a high level of protection for human health and the environment. Under the proposed approach, less hazard information would routinely be submitted upfront to the Health and Safety Executive, while the regulator would retain powers to request further information where needed to assess potential hazards and risks.

This is not a further consultation on the Government's settled ATRm policy. Instead, Defra is asking whether the draft legislation clearly and accurately gives effect to the policy conclusions published in March 2026, and whether any drafting issues, omissions, ambiguities, inconsistencies, procedural gaps or unintended consequences should be addressed before the statutory instrument is finalised.

The proposed amendments are set out as a tracked-changes version of some parts of the UK REACH legal text, known as a Keeling Schedule, alongside an explanation of the provisions. The consultation covers:

- hazard baseline requirements for standard registrations;
- registration requirements for intermediates;
- the new transitional evaluation procedure; and
- the treatment of substance groups.

UKHSA publishes Rapid Evidence Review on PFAS exposure in populations around industry

Under the UK PFAS Action Plan, in September the UK Health Security Agency (UKHSA) published a rapid evidence review addressing the question: 'What are the potential adverse health effects associated with exposure to PFAS in populations living around industrial sites or manufacturing sites producing or using PFAS chemicals and products?'. This is in relation to Action 3.1 of the Plan that committed the UKHSA to "Complete a PFAS review of evidence to support human health risk assessment".

UKHSA concluded overall that in their opinion "there is currently inadequate evidence to determine if there are likely to be any adverse effects of chronic PFAS exposure on the health of communities living near local industrial and manufacturing sites producing and using PFAS chemicals and products". The report looked at numerous health outcomes and, for many of these – including heart disease, diabetes, some cancers, some pregnancy and birth outcomes, and autoimmune diseases – there was insufficient evidence to be able to identify if there was a link with PFAS exposure. Cohort studies reviewed by UKHSA did suggest that "there might be an association between perfluoroctane sulphonic acid (PFOS)", also PFOS within PFAS mixtures, "and low birth weight" but UKHSA reports that "it is unlikely that any measurable effect on birth weight would be detectable in local communities near affected sites" because England has a "very low prevalence of low birth weight". The report is available on gov.uk.



ECHA Publishes 6th Report on Use of Alternatives to Animal Testing for EU-REACH

Published every three years, the European Chemical Agency's 6th report states the following key findings:

- "Overall, adaptations remain more frequently used than experimental studies to fulfil the information requirements; read-across continues to be the most frequent adaptation followed by waivers, weight of evidence and QSAR.
- About half of all experimental studies available in the REACH database were conducted before the entry into force of REACH, highlighting the importance of legacy data.
- The use of in vitro methods continues to increase, especially for skin corrosion/irritation and serious eye damage/eye irritation and skin sensitisation. The shift from in vivo to in vitro approaches, reported in the previous edition continued during 2022 and 2025.
- A decline is observed in the number of newly registered substances requiring hazard information. Between 2022 and 2025, 424 substances requiring hazard information4 were registered for the first time, representing a decrease of about 50% compared with the previous reporting period. The majority (74%) of these substances fall within the lowest tonnage band (REACH Annex VII)."

ECHA concludes that "overall, the analysis confirms that no major changes have been observed since the previous report, and that patterns in the use of adaptations and experimental studies to fulfil REACH information requirements have remained broadly stable." The report can be found on ECHA's webpage.

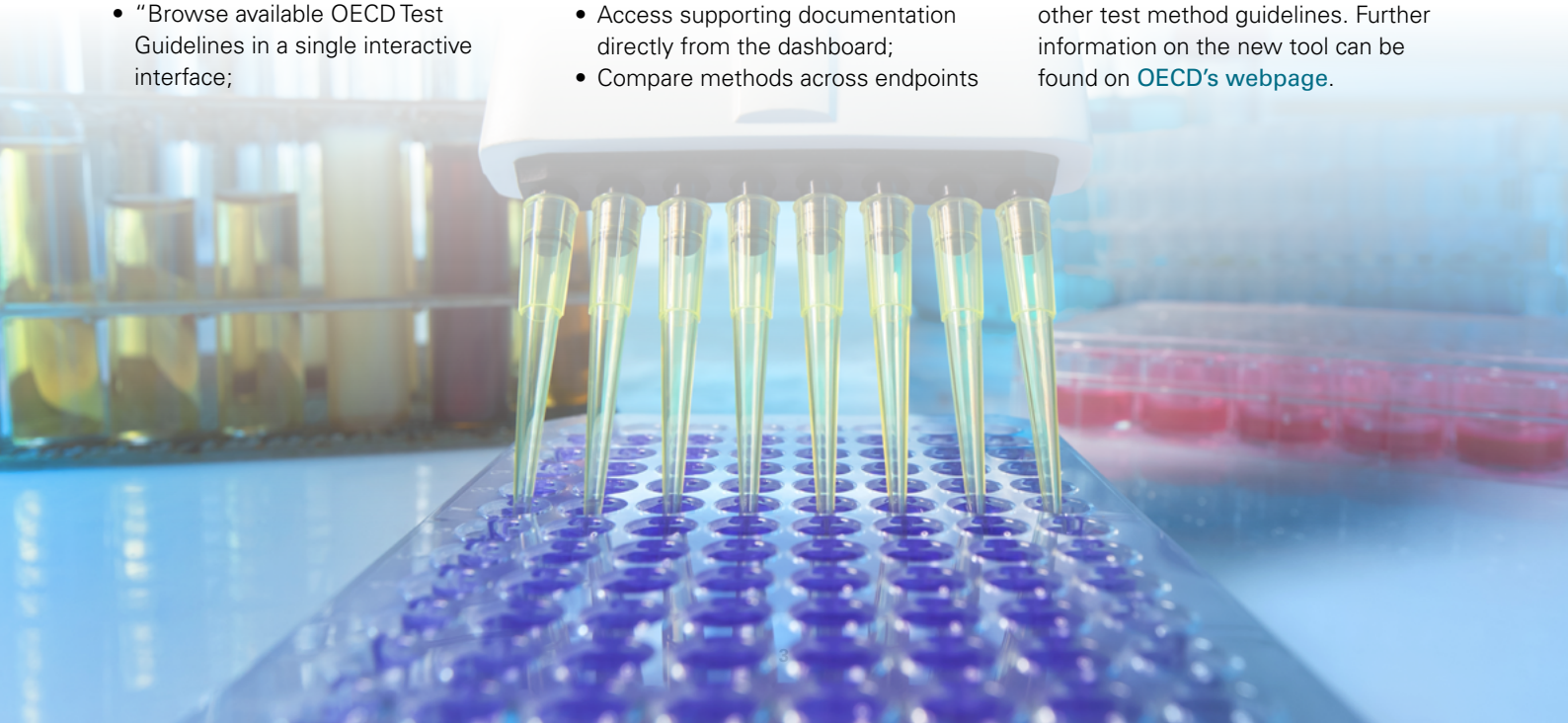


OECD launches tool for finding test guidelines

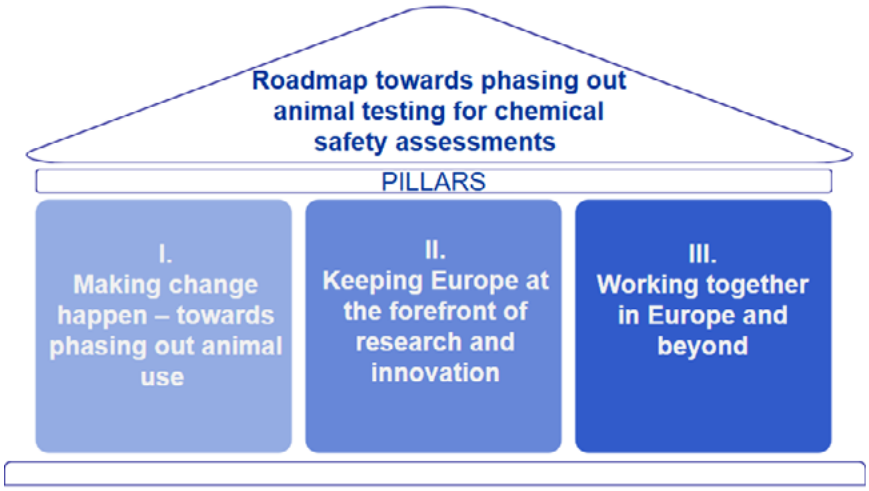
OECD, the Organization for Economic Cooperation and Development, has developed an interactive tool for finding available OECD Test guidelines. According to OECD, the 'OECD Test Guidelines Explorer for Chemical Testing' allows users to:

- "Browse available OECD Test Guidelines in a single interactive interface;
- Search by Test Guideline number or method name;
- Filter methods by endpoint, assay type;
- Obtain quick information on hazard classes covered and technical limitations identified;
- Access supporting documentation directly from the dashboard;
- Compare methods across endpoints and identify related approaches; and
- Obtain quick access to former versions of Test Guidelines updated over time."

Whilst currently this covers a sub-set of methods within Section 4: Health Effects, OECD plans to extend this for other test method guidelines. Further information on the new tool can be found on OECD's webpage.



European Commission's Roadmap for phasing out animal testing



Source: Image from European Commission's 2026 Roadmap towards phasing out animal testing for chemical safety assessments

The European Commission published its 'Roadmap towards phasing out animal testing for chemical safety assessments' in June. The publication, accompanied by a Staff Working Document, is a deliverable of the European Commission's 2025 Chemicals Action Plan. There are three pillars in the Roadmap, these being: Making change happen – towards phasing out animal use; Keeping Europe at the forefront of research and innovation; and working together in Europe and beyond. Under these pillars there are a total of 22 actions organised into short-term, mid-term and long-term. The Staff Working Document outlines opportunities and concrete actions per toxicological endpoint, proposed organisational structures to support the roadmap's implementation such as safe spaces, reflections on possible ways for engaging with the public to ensure broad acceptance, possible indicators for monitoring the progress and ongoing EU agency activities. A high-level conference is to be held by 2029 where progress will be reviewed. The Roadmap and Staff Working Document are available on the European Commission's webpage.

CLP continues to evolve in the EU and Great Britain

For anyone responsible for classification and labelling, keeping up with CLP increasingly means keeping track of two separate regulatory regimes. Although EU and GB CLP started from essentially the same point following the UK's exit from the EU, developments over recent years mean that requirements are increasingly diverging. During 2026 there has been significant activity on both sides, although not always in the same direction.

In the EU, CLP has become one of the pieces of legislation caught up in the European Commission's wider drive towards regulatory simplification. There have been two main developments to watch: the substantive Omnibus VI simplification proposals, which would amend some requirements introduced by the recent CLP Revision, and separate measures that became known as 'stop the clock', intended to delay certain requirements whilst the wider proposals were considered.

Those 'stop the clock' measures provided industry with some breathing room, postponing the application of a number of requirements introduced by Regulation (EU) 2024/2865 until 1 January 2028. However, developments have since moved on. In June 2026, the European Parliament and Council reached a provisional agreement on the substantive Omnibus VI proposals, including further changes to CLP. Importantly, the agreement would extend the application date for the relevant CLP labelling requirements to 1 January 2030, aligning the timetable across the three pieces of legislation covered by Omnibus VI.

The agreement would also give businesses more flexibility over some label formatting requirements, particularly for business-to-business and small packaging, whilst retaining readability requirements for products supplied to consumers. The European Parliament subsequently voted on the agreed Omnibus VI text on 22 October 2026.

However, 'stop the clock' does not mean 'stop CLP'. Regulation (EU) 2024/2865 remains in force and not all of its requirements were postponed. For example, the requirement for there to be an EU-established supplier responsible for compliance when a substance or mixture is placed on the EU market has applied since 1 July 2026. The additional time agreed under Omnibus VI may therefore be welcome, but companies should not assume that all requirements introduced by the CLP Revision have been postponed.

Alongside the Omnibus discussions, there are other changes which businesses need to be aware of. From 1 January 2027, distributors will be explicitly identified as duty holders under Article 45 of EU CLP. This is

particularly relevant where a distributor sells mixtures in a Member State not covered by an existing poison centre notification, or where products are rebranded under its own name or label. The forthcoming deadline has also been reflected in recent ECHA information for affected companies.

Of course, the wider revision of EU CLP is not the only source of divergence. The new EU hazard classes introduced in 2023, covering endocrine disruption for human health and the environment, PBT/vPvB and PMT/vPvM properties, have not been adopted into GB CLP. They therefore provide an important example of how businesses supplying both markets can already face different classification requirements.

Whilst companies supplying the EU have been dealing with these changes, there has also been plenty going on closer to home. The Chemicals (Health and Safety) (Amendment, Consequential and Transitional Provision) Regulations 2026 entered into force on 21 May, following the Government's Chemicals Legislative Reform programme. The changes include amendments to GB CLP covering classification and labelling notifications and the system for adopting mandatory classifications.

Perhaps the most immediately noticeable change for duty holders is the removal of the GB classification and labelling notification requirement. Since 21 May 2026, the separate requirement to notify HSE of classification and labelling information has been removed. Whilst this represents a welcome administrative simplification, it does not remove companies' underlying responsibilities for classification, labelling, packaging or the provision of safety data sheets where required.

The reforms have also changed the GB Mandatory Classification and Labelling, or GB MCL, process. From 21 May, technical notes previously contained within Annex VI of GB CLP were moved into the GB MCL List, enabling HSE to update these notes as required. Changes to the Article 37 process have also provided a new framework for adopting new or revised mandatory classifications.

The GB MCL List is legally binding in England, Scotland and Wales. Where a substance appears on it, the mandatory classification must be used. For mixtures containing a substance on the list, the mandatory classification must also be taken into account when classifying the mixture. Importantly, businesses should not assume that an EU harmonised classification and a GB mandatory classification will necessarily be identical. HSE notes that GB can determine its own GB MCL where justified by supporting scientific data and wider policy considerations, meaning that the GB MCL and EU CLH for the same substance may differ.

The GB MCL process has also remained active during 2026. In September, HSE published Agency Opinions covering 22 substances or groups of substances. At the time of publication, the proposed classifications had not yet been agreed or adopted in GB, an important distinction for businesses monitoring potential changes to mandatory classifications. More recently, HSE published the final batch of technical reports issued under the previous Article 37, EU-linked process.

It would be easy to look at these developments and conclude that EU and GB CLP are simply moving further apart, but the position is more nuanced. The Government's Chemicals Legislative Reform work has also considered how unnecessary differences might be reduced. HSE's response to the consultation highlighted minimising potential divergence from the EU as a priority alongside maintaining science-based decision-making, whilst noting that regulatory decisions would diverge from those made in the EU only in exceptional circumstances.

There also continue to be practical links between the EU and GB classification processes. Information gathered through the EU CLH process can feed into consideration of GB MCLs, and UK businesses are encouraged to participate in relevant ECHA CLH consultations. Whilst the legal requirements may increasingly differ, developments in one jurisdiction should therefore not necessarily be viewed in isolation from the other.

What does all this mean in practice? For companies supplying both EU and GB markets, perhaps the most important point is that CLP compliance can no longer be managed on the assumption that the requirements are interchangeable. Companies need to know where their products are being placed on the market and ensure that classification databases, safety data sheets and labelling processes can accommodate differences where they occur.

For companies supplying the EU, it is worth revisiting implementation plans for Regulation (EU) 2024/2865 in light of the changing timetable. Under the Parliament-Council agreement, the relevant CLP labelling requirements would apply from 1 January 2030. Other requirements introduced by the CLP Revision are already applicable. In GB, compliance procedures should reflect the removal of the separate classification and labelling notification requirement whilst retaining the underlying processes needed to classify and communicate hazards correctly.

Ultimately, the current picture is something of a mixed one. There is welcome simplification in some areas, but this sits alongside increasing regulatory complexity for companies operating across borders. Keeping up with CLP is therefore becoming less about knowing one set of rules, and increasingly about knowing which requirements apply, in which market, and from when.

REACHReady will continue to monitor developments in both EU and GB CLP through our Technical Alerts and other member updates.



REACHReady's public training workshop CLP for Downstream Users is scheduled for the mornings of 10th and 11th February 2027, online.

UK REACH: substance identity, and a more affordable registration

Defra's technical consultation on the Alternative Transitional Registration Model (ATRm), open until 10 November 2026, is the point at which transitional registration under UK REACH becomes a project companies can plan. For substances already on the EU market at EU exit, the draft provisions cut the hazard information requirements. Registrants would submit hazard conclusions rather than the full study package and face a further data request from the Health and Safety Executive only where a concern is identified. That is a genuine reduction in work and cost.

What still needs to be included

UK REACH still works on one substance, one registration. Substance Identification is still the cornerstone of any submission, deciding which joint submission a company can join, or whether two materials are the same substance. For a transitional registration, Substance Identification and Dossier preparation now represent the majority of the technical work.

Substance identification

Substance identification establishes identity from spectroscopic and chromatographic evidence, with composition and purity. It is what allows data to be shared, animal testing to be avoided, and, in some cases, read-across to be argued. ECHA guidance remains the practical reference. The output is a substance identity profile: the boundary a company checks its own material against before it joins a registration, or decides it needs one of its own. Repeated down a supply chain, the same check is a control against substitution of a similar but different substance.

For a simple mono-constituent, with one constituent normally at 80% or more, the comparison is often straightforward. Complex substances need the same rules read against the chemistry of the process.

Where standard analysis is not enough

For complex substances such as organic pigments, identity cannot be read off a single chromatogram. Insolubility limits standard GC- and HPLC-MS approaches, so composition is established through a weight-of-evidence approach: metal ratios or catalyst traces, extracted impurities, elemental analysis, thermal decomposition data and residual water.

None of these results, alone, provides a substance identity but read together, with a working knowledge of the manufacturing chemistry, they can provide sufficient weight of evidence. Sameness evidence can also support read across.

For example, dissociation studies under mammalian and environmental conditions, with the breakdown products identified and quantified, have been used to show that a further vertebrate study would not add information.

From identity to a dossier

A clear substance identity is the foundation for the rest of the registration. It confirms that the company's composition falls within the substance identity profile, supports the inquiry process, and provides the analytical evidence required in the IUCLID dossier. Because the ATRm reduces the hazard content, dossier preparation is more contained — but it still depends entirely on getting the identity right first. Errors here are what turn a streamlined registration back into a lengthy one.

New substances sit outside the transitional model and still face the full identification and data rules. For transitional substances, the practical sequence is now short enough for most companies to proceed: confirm what is being placed on the GB market, match it to a profile, and file.

Case study: Substance identification of a complex dye

In a recent UK REACH project, chromatographic analysis raised questions about the composition and purity of a dye, despite its UV-visible spectrum matching historical data.

We reviewed the historical and current analytical results, using detailed knowledge of the substance's chemistry and manufacturing processes to interpret the differences and assess their significance.

By combining analytical interpretation, chemical and process knowledge with regulatory expertise, we developed a weight-of-evidence approach to support substance identification and preparation of the UK REACH dossier.

This demonstrates the value of integrating chemical expertise, laboratory analysis and regulatory knowledge rather than treating them as separate activities.

Moving a registration forward

Coracle provides both the substance identification and the UK REACH dossier preparation that now form the core of a transitional registration. For both straightforward and complex substances, we establish the identity, check sameness, handle the inquiry and build the IUCLID dossier as a single piece of work. This avoids the gap that can appear when laboratory data and dossier content are handled separately. As a REACHReady Approved Service Provider, we focus on the practical steps that let companies move ahead with their future plans.

Claire Clarke is the Director at Coracle. The opinions expressed in this article are the author's own and do not necessarily reflect those of REACHReady.
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Coracle
Easy REACH Analysis Ltd T/A Coracle

This continues our series of case studies designed to highlight and clarify a variety of REACH/ CLP scenarios.

REACHReady Case Study: Consultancy and Training

Case Study: Article vs Chemical?

Throughout the history of REACHReady, a perennial question we are asked is whether a material is an 'article' or a 'chemical'. The answer remains the same in that the manufacturer/importer/supplier must make their own decision and then be prepared to defend their reasoning. The HSE or ECHA can give opinions, but even these agencies do not have the authority to make a definitive decision.

Guidance suggests that if the material is not in the final shape or physical form for end use, it is very likely a 'chemical'. The obvious example is that wet paint is a chemical, but when dried on a surface, it is part of an article. (There are some anomalies in that lubricants or refrigerants inside machines are considered part of the article).

A recent case has been to help with the import of a pre-polymer sheet. This is a type of material of a set thickness that will be cut to shape (properties of an 'article'), but will undergo chemical change when 'cured' to set the flexible material into a rigid form (chemical reaction). To complicate things further, many of these materials will include a mesh that holds the 'mixture' in shape, and these parts of the product are very likely 'articles'.

The advice given in such cases is to consider the components that undergo chemical change during curing as 'chemical' and from the composition (i.e. knowing % w/w content) work out the tonnage of these chemicals to be imported. If polymeric, then it will of course be the monomers/reagents that need to be Registered.

At REACHReady, we can only give our opinion in such matters and this is typically based on past experiences. However, merely seeking an independent opinion from a third party such as REACHReady is a major step towards compliance; if ultimately enforcement agencies disagree, there is still evidence of the requirement to consider such matters.

REACHReady's annual Managing REACH for suppliers of articles: How compliant are you? workshop is scheduled for the mornings of 9th and 10th December, online.

For more information please call +44 (0)20 7901 1444 or email enquiries@reachready.co.uk.

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Future events

See www.cia.org.uk/reachready/events **for full details**

REACH – The Basics

11 & 12 November 2026 (virtual, mornings only)

Our most popular workshop is an excellent place to start for anyone who needs to understand more about both UK and EU REACH. Also of interest to non-EU suppliers of substances and mixtures who are looking to support their EU customers on REACH.

For more details or to book

Managing REACH for suppliers of articles: How compliant are you?

8 & 9 December 2026 (virtual, mornings only)

As more SVHCs come under the regulatory spotlight and the number of customer enquiries your company receives regarding chemicals of concern grow, you will be ever more reliant on a robust supply chain management system to ensure REACH compliance as part of product stewardship.

This workshop will outline the essentials of a compliance strategy that will help you identify if you are doing all you can to comply, recognise where business risks are likely to occur and how to minimise them and develop and maintain your strategy for compliance as part of good product stewardship. The implications of the UK withdrawal from the EU will be discussed throughout each session.

Aimed at business managers and regulatory specialists in companies that supply articles within the UK and EU. Of particular relevance to companies working through the requirements in the REACH Regulation for finished goods, sub-assemblies and components. Also of interest to importers and producers of articles alike, who are dealing with supply chain communication obligations and verifying product compliance.

For more details or to book

CLP for Downstream users

10 & 11 February 2027 (virtual, mornings only)

Classification is the key process that ensures labels and safety data sheets (SDS) provide accurate information on hazards, helping recipients use your chemical products safely. Understanding the principles and requirements of the Classification, Labelling and Packaging (CLP) Regulation is crucial to making sure your labels and SDS are correct and compliant with the regulations. This workshop aims to give you an understanding of your duties under both EU and GB CLP, as well as practical skills to help you classify and label your products correctly.

For more details or to book

IUCLID 6 – 1-day practical training for REACH registrants

20 May 2027 (in-person; London)

IUCLID – the International Uniform Chemical Information Database – is the official tool for REACH data collection. REACHReady's comprehensive and interactive user training course will teach you how to use it.

For more details or to book

See https://cia-online.org.uk/reachready/Events/ **for further details, or register your interest via** events@reachready.co.uk **to hear when booking opens.**

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Published by REACHReady Limited
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