



1 January 2023

Subject: Ashland position on UK-REACH

Dear Valued Customer,

As of 1st January 2021, the transition period between the United Kingdom (UK) and the European Union (EU) ended and while a late deal was struck between the two entities, the chemicals industry and specifically the EU-REACH and newly formed UK-REACH were not addressed directly in the agreement. A significant impact felt in the UK will center around access to data on individual substances, data which will be needed to populate the currently empty UK-REACH database upon registration of substances.

This leaves the industry in a situation which has been called, double-data, double registration referring to the existing EU-REACH registration and the addition of an identical but necessary UK-REACH registration. Currently as there is no agreement on sharing of data found in EU-REACH dossiers, UK registrants including Ashland will have increasing difficulty accessing EU-held data sets.

In response to industry's concerns on data and cost repetition to complete the registrations, the UK worked to explore an alternative transitional registration (ATR) model. This resulted in amendments to the current legislation extending the registration deadlines to 27 October 2025 to provide time for consultation for further deadline extensions. Results of the consultation by the Health and Safety Executive strongly favored a full 3-year delay from the original registration deadline to October 2026, 2028, and 2030 depending on substance tonnage. This will ensure sufficient time policy development and to make operational and legislative changes to implement the new registration model.

As a manufacturer, importer, purchaser, and downstream user of chemical substances in the UK, Ashland's GB-based entities have submitted Downstream User Importer Notification (DUIN) for all relevant substances October 2021 and being updated. As the DUIN portal has remained open, Ashland continues to evaluate and submit DUINs as necessary. Ashland has also begun the process of evaluating registration of substances under the UK-REACH, as necessary, within the timeline depending on the import tonnage volume and chemical properties. For any substances newly imported into the UK and not being previously registered under EU-REACH Ashland will be required to evaluate the possibility of an immediate registration under UK-REACH.

Ashland's product portfolio is subject to continual evaluation and optimization based on market and customer needs, including market size and profitability.

If you have questions regarding this topic, please contact us via your Ashland representative.

Kind Regards,

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