24th November 2017

Dear NAME MP,


This regulation applies to those companies who import chemicals into the European Union (EU) and a requirement of the regulation is that only those companies that are registered within the EU are permitted to register substances under the EU’s REACH programme.

The United Kingdom’s withdrawal from the European Union will mean that it would no longer be a member state of the EU and consequently any registrations held by UK companies after the date of withdrawal would be deemed to be ‘non-existent’ by ECHA under the current regulatory rules.

You may be aware that UK companies have spent many thousands of pounds registering chemical substances and mixtures with ECHA over the past few years, and the average cost of registering a chemical substance or mixture can reach many hundreds of thousands of pounds.

I am informed through my trade association the United Kingdom Lubricants Association that the Department for the Environment, Food and Rural Affairs (DEFRA) is looking at setting up a UK REACH system after the UK’s withdrawal from the European Union. Should this involve the re-registration of chemical substances and mixtures already registered through the EU’s REACH programme with ECHA, then this will impose unnecessary bureaucratic burdens and have severe economic consequences for British businesses.

A preferred solution would be to press the European Union for continued access to the EU REACH programme for the UK as part of withdrawal negotiations. This country is the European Union’s largest single trading partner and so mutual recognition of chemical substances and mixtures already registered through the EU REACH programme will be for the benefit of both the EU and the United Kingdom. For companies based here it provides the assurance that products exported into the EU remain compliant with the relevant regulation. Mutual recognition also allows companies based in the European Union to continue to export products into the United Kingdom without hampering free trade arrangements.
I am therefore seeking your assurance as my local Member of Parliament that, as part of the Brexit negotiations with the European Union, you will bring all of the means available at your disposal to lobby colleagues in the UK Government to ensure that the United Kingdom remains part of the existing EU REACH regulatory system.

Yours sincerely,

NAME
POSITION