



Department
for Environment,
Food & Rural Affairs

Technical Consultation on the Alternative Transitional Registration (ATRm) for UK REACH

29 September 2026

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Glossary

ATRm table of amendments

Article	Description of change
Article 2B	Extends environmental regulator advice requirements to new transitional evaluation functions.
Article 3(46)	Introduces the definition of a “substance group”.
Article 10	Makes standard registration information requirements subject to Articles 127B and 127NA.
Article 12	Makes tonnage-based information requirements subject to Articles 127B and 127NA.
Article 14	Adapts chemical safety report requirements for transitional registrations.
Article 17	Applies transitional information rules (Articles 127L and 127NB) to on-site isolated intermediates.
Article 18	Applies transitional information rules (Articles 127M and 127NB) to transported isolated intermediates.
Article 25(3)	Allows older EU REACH studies to support registration and transitional evaluation responses.
Article 25A	Creates obligations in relation to substance groups for information exchange and agreement on classification and labelling.
Article 26(3)	Updates how the 12-year data protection period is calculated for grandfathered registrations.
Article 91	Extends the right of appeal to relevant Agency decisions under the new transitional provisions.
Article 119	Modifies the requirement for the Agency to make specified information publicly available.
Article 127ZA	Updates definitions used for the transitional provisions, including new or updated definitions for ‘Article 10 information’, ‘lead registrant’ and ‘EU CLP’.
Article 127B	Establishes modified information requirements for existing transitional registrations.
Article 127D	Deleted as definitions are restated or amended in new Article 127ZA.
Article 127L	Provides transitional rules for on-site isolated intermediates.
Article 127M	Provides transitional rules for transported isolated intermediates.
Article 127NA	Sets modified registration information requirements under the new registration model.
Article 127NB	Sets modified information requirements for isolated intermediates.
Article 127OA	Provides for data sharing and transitional arrangements supporting the fair, transparent and non-discriminatory allocation and operation of associated costs under the new registration model.

Article 127Q	Provides the Agency with a discretionary power to request further information for transitional evaluation purposes under the new registration model.
Article 127R	Establishes the process for draft transitional evaluation decisions, including requests for additional information, registrant comment rights and notification requirements.
Article 127S	Provides for final transitional evaluation decisions. Following consideration of any comments received on a draft decision under Article 127R, the Agency may adopt a final decision requiring the submission of specified information and setting deadlines for its submission.
Article 127T	Provides for the review of information submitted in response to transitional evaluation decisions and enables the Agency, where necessary, to require further information through subsequent decisions. It also includes provisions on publication and completion of the transitional evaluation process.
Article 127U	Allows appeals against the Agency's transitional evaluation decisions in accordance with Articles 91 to 93.

Background

1. Following the UK's departure from the European Union (EU), businesses wishing to continue manufacturing or importing chemical substances into Great Britain (GB) (England, Wales and Scotland) became subject to UK REACH. Transitional arrangements were introduced to maintain continuity of supply for substances that had previously been registered under EU REACH. To this end, businesses were given more time to register under UK REACH so that chemicals already registered under EU REACH could continue to be supplied in Great Britain. EU REACH continues to apply in Northern Ireland in line with the Windsor Framework.
2. Industry raised concerns that the cost of buying or accessing the EU hazard data needed to complete transitional registrations, estimated at approximately £2 billion by 2030, would duplicate expenditure already incurred under EU REACH and could be disproportionate to the regulatory benefits. There were also concerns that some businesses might decide not to register certain substances, potentially leading to their withdrawal from the GB market, disruption to downstream supply chains and reduced competitiveness.
3. These concerns led to the development of the Alternative Transitional Registration model (ATRm). In 2024, the Government consulted on a more proportionate registration framework for transitional substances that sought to reduce the costs associated with UK REACH registration while ensuring a high level of protection for human health and the environment in line with Article 1 of UK REACH. The proposal centred on reducing the amount of hazard information routinely required to be submitted to the Agency, while enabling the regulator to request additional information where necessary to support its proper regulatory functions.

Context

4. In its [Summary of Responses and Government Response](#) to the 2024 consultation published on 30 March 2026, the Government confirmed its approach to the Alternative Transitional Registration model (ATRm). Under that approach, transitional registrations will require less information to be submitted to the HSE than is required for substances being placed on the GB market for the first time. In line with better regulation principles, the ATRm reduces upfront registration requirements while providing the regulator with enhanced powers to request further information where needed to support regulatory decision making.
5. The new transitional registration requirements define the minimum amount and type of information that needs to be registered upfront to provide confidence that potentially harmful chemicals are being managed safely in GB, while maintaining the UK REACH principle of “no data, no market” that is the core principle of UK REACH and is set out in Article 5 of that regulation. The ATRm registration requirements do not vary according to the type and size

of business. Instead, they depend on the tonnage at which a substance is manufactured or imported and its hazard classification.

6. The ATRm retains the hazard baseline approach set out in the 2024 consultation and introduces corresponding changes to the chemical safety assessment (CSA), the chemical safety report (CSR), intermediates and to the treatment of substance groups. Overall, therefore, less information will now need to be registered upfront with the HSE while continuing to ensure a high level of protection of human health and the environment.
7. As set out in the Government's March 2026 response to the 2024 consultation, we do not aim to introduce additional registration requirements relating to the 'use' of chemicals and to the 'exposure' they generate, on the basis that applying additional requirements is currently considered to be unnecessary and would create new regulatory burdens for GB registered businesses.
8. The 2024 consultation also proposed wider UK REACH reforms covering reporting, restrictions and animal testing. We are removing these proposals from being delivered alongside the ATRm and may consider incorporating them into a broader UK REACH reform package in the future.

Purpose

9. This technical consultation seeks comments on the draft legal provisions intended to give effect to the policy conclusions published on 30 March 2026 in the Government response to the 2024 consultation.
10. The ATRm will be delivered by way of a Statutory Instrument (SI) which amends UK REACH. The proposals are presented in this consultation as amendments to the legal text of UK REACH, to show how the regulation will look if the proposed amendment SI becomes law. This document is known as a Keeling Schedule. It is hoped that presenting the proposals as a Keeling Schedule will make it easier for stakeholders to understand and comment on their effect. Only the provisions of UK REACH that are proposed to be amended are included in the Keeling Schedule, along with any others which help to place them in context. Those provisions that are omitted from the Keeling Schedule will remain unchanged in UK REACH. The amendments presented in the Keeling Schedule are not yet law and are subject to change.

Introduction to legislative proposals

(Explainer)

11. The proposed amendments to UK REACH which will give effect to the ATRm are primarily in Title 14A (EU withdrawal: transitional provision) of the regulation. This is because Title 14A already includes various transitional provisions put in place at the time the UK left the EU, including for transitional registrations. We have continued the previous practice of using the transitional provisions to modify the effect of other provisions such as Article 10 (Information to be submitted for general registration purposes) and Annex 1 (General provisions for assessing substances and preparing chemical safety reports) rather than amending them directly, apart from including statements to confirm that they are subject to the effect of the transitional provisions where relevant. This is because those provisions still apply in their entirety for non-transitional substances.
12. New Article 127ZA contains definitions that are specific to Title 14A of UK REACH. It replaces and expands on Article 127D, which is deleted. The definition of an “existing EU registration” in new Article 127ZA determines which substances are transitional substances, and therefore within scope of the ATRm. In essence, these are any substances that were registered and subsisting under EU REACH immediately before IP completion day (i.e. 11pm on 31 December 2020).
13. The following sections explain how the proposed amendments presented in the Keeling Schedule would give effect to the Government’s policy intentions, under the following headings:
 - Hazard information and the reduced datasets for transitional registrations, including:
 - (i) Hazard information submitted for registration purposes under Article 10;
 - (ii) Chemical safety assessments and chemical safety reports;
 - (iii) New registrations of existing substances (NRES) and registrations following a Downstream User Information Notification (DUIN);
 - (iv) on-site and transported isolated intermediates;
 - Use and exposure information retained under existing UK REACH requirements;
 - Transitional evaluation powers;
 - Substance groups, data and cost sharing, and joint submission of information;
 - Fees.

Hazard information and the reduced datasets for transitional registrations

(i) Hazard information submitted for registration purposes under Article 10

14. Under Article 127B(4) of UK REACH, holders of grandfathered GB registrations continue to complete their registrations in stages. The identifying information in Article 10(a)(i), (ii) and (iii), together with any relevant assessor indication under Article 10(a)(viii), was required within 120-days post-Implementation period (IP) completion day. Under the ATRm the remaining information must be submitted by the applicable transitional deadline.
15. Where Article 127B(4A) applies, the registrant would not be required to submit the full study summary, robust study summary and testing proposal dataset that would ordinarily accompany a registration. New Article 127B(4B) sets out the circumstances in which this reduced approach is available. The reduced requirements would apply where the substance remains registered under EU REACH as a non-intermediate at the same or a higher tonnage band. They also apply where the GB registration is in the 1 to 10 tonnes per year band and the substance is registered under EU REACH as a transported isolated intermediate at 1,000 tonnes or more per year. Where neither condition is met, the registrant must submit the remaining Article 10 information required under Article 127B(4)(b).
16. Where the conditions in Article 127B(4B) are satisfied, Article 127B(4C) would apply and would require a defined package of information to be submitted instead of the full study summary, robust study summary and testing proposal dataset. This would include the substance's classification and labelling under Article 10(a)(iv), guidance on safe use under Article 10(a)(v), any exposure information required for the 1 to 10 tonnes band under Article 10(a)(x), and any relevant assessor indications under Article 10(a)(viii).
17. Under new Article 127B(4C), where there is no mandatory classification (MCL) under GB CLP, the classification would need to be accompanied by a statement confirming consistency with the applicable harmonised classification in Annex VI to EU CLP or, where no harmonised classification exists, with the classification submitted by the EU REACH lead registrant and published by ECHA. Any inconsistency, or inability to provide a classification, would be required to be explained. We expect that the GB registrants will be in possession of such reasons.
18. Where Article 14(1) applies and a CSR is required to be submitted under Article 10(b), Articles 127B(4C)(c) and 127B(4D) require the registrant to submit specified information from Annex I. This comprises the human health hazard classification and identification of DNELs, subject to the stated exclusion from the justification required by point 1.4.1; the physicochemical and environmental hazard classifications; identification of PNECs; and the classification resulting from the PBT and vPvB assessment.

19. The registrant will also be required by Article 127B(4D) to submit a statement confirming that its PBT and vPvB assessment results, and each DNEL, DMEL or PNEC it has derived, are consistent with the corresponding results submitted by the EU REACH lead registrant and published by ECHA. Where results are inconsistent, or where a DNEL, DMEL or PNEC cannot be derived or provided, the registrant must provide reasons.
20. Where Article 14(4) applies, due to the substance fulfilling the criteria for certain hazard classes or categories set out in that provision, the registrant will be required to additionally provide the exposure assessment and risk characterisation required by sections 5 and 6 of Annex I, together with specified physicochemical information and ready biodegradability information from Annex VII. Article 127B(4E) identifies the CSA steps that must be carried out to generate this information but removes the requirement for transitional registrants to document those assessment steps in the chemical safety report.
21. The reduced submission remains subject to transitional evaluation under Article 127Q, enabling the Agency to request further information where it considers it necessary to evaluate the substance's potential hazards and risks. A full process for this is set out from Article 127Q onwards. See paragraph [46](#)

(ii) Chemical safety assessments and chemical safety reports

22. For substances manufactured or imported at 10 tonnes or more per year, Article 14(1) generally requires a registrant to carry out a chemical safety assessment (CSA) and document it in a chemical safety report (CSR). The assessment covers the substance's human health, physicochemical and environmental hazards, including whether it has persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) properties.
23. Under the standard registration requirements, Article 10(b) requires the CSR to be submitted as part of the registration dossier. Where Article 14(4) applies because the substance meets the relevant hazard classification criteria or is assessed as PBT or vPvB, the CSA and CSR will also need to extend beyond hazard assessment to include an exposure assessment, including exposure scenarios, and a risk characterisation.
24. For transferred GB registrations, the ATRm replaces the full standard information package with a defined reduced submission where either condition in Article 127B(4B) is met. Where neither condition is met, the other Article 10 information remains due under Article 127B(4)(b). The reduced route is subject to transitional evaluation by the Agency under Article 127Q as set out above.
25. Where the reduced route applies, Article 127B(4C) explicitly specifies what the registrant will be required to submit. This includes classification and labelling, guidance on safe use, any exposure information required for substances in the 1 to 10 tonnes band and relevant assessor indications. The classification must be accompanied by a statement confirming consistency with the applicable harmonised classification under EU CLP or, where none exists, the classification submitted by the EU REACH lead registrant and published by

ECHA. Any inconsistency, or inability to provide a classification, must be explained by the registrant.

26. Where Article 14(1) requires a CSR, Article 127B(4D) defines the chemical safety information that must be provided. This includes the relevant human health, physicochemical and environmental classifications, identification of DNELs, DMELs and PNECs, and the PBT and vPvB assessment conclusion. The registrant will be required to confirm that these results are consistent with those submitted by the EU REACH lead registrant and published by ECHA, or explain any inconsistency or why a value could not be derived or provided.
27. Where Article 14(4) applies, Article 127B(4D) requires the registrant to submit the exposure assessment and risk characterisation required under sections 5 and 6 of Annex I. The registrant must also provide the information specified in sections 7.1 and 7.2 of Annex VII on the substance's physical state, appearance together with the ready biodegradability information specified in section 9.2.1.1 of Annex VII. The requirement therefore preserves the assessment outcomes and risk management information needed for regulatory purposes without requiring the full underlying study dataset to be submitted upfront.
28. Article 127B(4E) identifies in a Table, the CSA steps in Annex I that must be carried out to produce the information required by Article 127B(4D). It also provides that those steps are not required to be documented in the CSR. This streamlines the report while ensuring that the specified classifications, derived values, assessment conclusions, exposure assessment and risk characterisation are still produced and available for regulatory scrutiny, as appropriate.

(iii) Hazard information required for New Registration of Existing Substances (NRES) and Downstream Users

29. Under UK REACH, Articles 127A and 127B currently only cover grandfathered registrations (please refer to the definition of 'grandfathering' available in the glossary). The ATRm extends these transitional provisions under Article 127NA for registrants of substances with an existing EU registration¹ entering or re-entering the GB market after IP completion day (NRES). It also applies where a GB downstream user or distributor registers a substance imported under the protected transitional import arrangements in Article 127E following a DUIN.
30. At registration, Article 127NA(3)(a) requires the registrant to submit their identity, the identity of the substance, information on manufacture and identified uses, and any relevant assessor indication. The information required under Article 127NA(3)(b) will need to be submitted by the applicable transitional deadline or, if later, when the initial registration information is submitted.

¹ Within the meaning under Article 127ZA

31. Article 127NA(4) sets out the conditions for when registrants must submit the reduced information. The substance must already be registered under EU REACH as a non-intermediate at the same or a higher tonnage band. Alternatively, where the GB registration is in the 1 to 10 tonnes per year band, the substance must already be registered under EU REACH as a transported isolated intermediate at 1,000 tonnes or more per year.
32. If neither condition is met, the registrant must submit the Article 10 information required for a standard registration. If either condition is met, Article 127NA(5) positively specifies the reduced information package that must be submitted to the Agency, rather than describing information that may be omitted.
33. This reduced information package includes classification and labelling, guidance on safe use, any exposure information required for substances in the 1 to 10 tonnes band, and relevant assessor indications. Where there is no mandatory classification (MCL) under GB CLP, the classification must be accompanied by a statement confirming consistency with the applicable harmonised classification under EU CLP or, where none exists, with the classification submitted by the EU REACH lead registrant and published by ECHA. Any inconsistency, or inability to provide a classification, must be explained. We expect that the GB registrants will be in possession of such reasons.
34. Where Article 14(1) applies and the submission of a CSR is required under Article 10(b), Article 127NA(6) specifies the chemical safety information that must be submitted. This includes the human health hazard classification and identification of DNELs, the physicochemical and environmental hazard classifications, identification of PNECs, and the PBT and vPvB assessment classification. The registrant will be required to confirm that these results are consistent with those submitted by the EU REACH lead registrant and published by ECHA, or explain any inconsistency or why a value could not be derived or provided.
35. Where Article 14(4) applies, the package to be submitted also requires the exposure assessment and risk characterisation required by sections 5 and 6 of Annex I, as well as specified physicochemical information and ready biodegradability information from Annex VII. Article 127NA(7) would apply the CSA steps listed in the Article 127B(4E) table to registrants producing this information but would not require those steps to be documented in the CSR. The registration would be subject to the new transitional evaluation process under Article 127Q.
36. Article 127NA(8) adapts the existing Article 11 joint submission rules for these registrations. Under these rules, classification information and the classification consistency statement are submitted by a lead registrant on behalf of the joint submission. Each registrant must submit separately information on their identity, the identity of the substance, manufacture and use and, where applicable, exposure information. Guidance on safe use, the CSR information required under Article 127NA(6)(a), and the associated consistency statements

under Article 127NA(6)(b) may either be submitted separately by each registrant or by one registrant on behalf of the others. The existing grounds for submitting information separately under existing Article 11(3) instead of through the joint submission would continue to apply.

37. Article 127NA(9) modifies the inquiry provisions in Article 26 so that, where a potential registrant identifies an existing registration for the same substance, the available studies will be required to be shared in accordance with the new data-sharing arrangements in Article 127OA, which sets out obligations on registrants to make enquiries within their substance group, share information and costs on a fair, transparent and non-discriminatory basis, and, where necessary, generate new information collectively. Article 127OA would apply for this data sharing rather than the existing Article 27 process, which is disapplied by Article 127NA(10) for registrants subject to Article 127NA

(iv) Hazard information required for Intermediates

38. UK REACH contains separate registration requirements for isolated intermediates because they are manufactured and used under strictly controlled conditions. The ATRm retains transitional arrangements for registrations grandfathered from EU REACH. Article 127L applies to existing registrations for on-site isolated intermediates under Article 17, while Article 127M applies to existing registrations for transported isolated intermediates under Article 18.

Existing Article 17 and Article 18

39. For grandfathered registrations, the registrant must already have provided the information identifying the registrant and intermediate, together with information on use, risk management measures and confirmation of strictly controlled conditions. The amended Articles 127L and 127M will specify the information still due by the relevant transitional deadline and introduce more detailed requirements for demonstrating consistency with classifications available under EU REACH.
40. Under ATRm the Article 18(3) information will not be required where a transported isolated intermediate is registered under EU REACH either as a transported isolated intermediate registration at 1,000 tonnes or more per year or as a substance other than an intermediate at any tonnage band. If neither limb is satisfied, the additional Article 18(3) dataset would need to be submitted, irrespective of the GB tonnage of the registration.
41. For both on-site and transported isolated intermediates, the registrant's consistency statement will need to confirm that each hazard class or differentiation² that is not present on the GB mandatory classification and labelling list remains consistent with the harmonised classification in Annex VI to EU CLP or, where there is no harmonised classification, with the classification previously submitted by the EU REACH lead registrant and published by

² Subdivision of a hazard class

ECHA. Any inconsistency would need to be explained, and if no classification can be given, the registrant would be required to explain why.

New registrations for isolated intermediates or protected transitional imports

42. New Article 127NB will apply the same approach to new registrations where a person established in GB commences or recommences, after IP completion day, the manufacture of an on-site isolated intermediate or the manufacture or import of a transported isolated intermediate, provided that the intermediate has an existing EU registration. It will also apply where a GB downstream user or distributor imports a transported isolated intermediate under the protected transitional import arrangements in Article 127E following a DUIN.
43. New Article 127NB specifies what hazard information will need to be submitted, when it must be submitted and, for transported isolated intermediates, whether the additional information in Article 18(3) is required. These requirements will remain subject to new Article 127Q, which will allow the Agency to request further information where needed to evaluate potential hazards and risks.
44. For a transported isolated intermediate registered under Article 18, Article 127NB(4) similarly will require the submission of identity, use and risk management information, together with confirmation that the strictly controlled conditions in Article 18(4) are met, at the time of registration. By the relevant transitional deadline, or at registration if later, the registrant would also have to submit the classification information required by Article 18(2)(c) and the accompanying consistency statement. Where the condition in Article 127NB(5) is not met, the registrant will also be required to provide the additional Annex VII information required by Article 18(3).

Joint Submission of data on isolated intermediates

45. Under ATRm Article 19 would continue to require joint submission of the relevant classification information, any relevant Article 18(3) information and the provision of statements, subject to the existing opt outs for reasons of disproportionate cost, commercial sensitivity or disagreement where applicable. Article 19 also routes access to existing studies through the new substance group data and cost sharing process that is set out in new Article 127OA and would disapply the standard Article 27 sharing process for persons submitting information under new Article 127NB.

Transitional Evaluation Powers

46. The ATRm will reduce the amount of hazard information that will be required to be submitted upfront for transitional registrations where a substance or intermediate continues to be recognised by an existing EU REACH registration. Transitional evaluation powers will therefore be introduced to ensure that this more proportionate approach to registration does not limit the Agency's ability to investigate and regulate potential hazards and risks. The

transitional evaluation provisions are proposed to be added at new Articles 127Q to 127U of UK REACH.

47. These new powers will provide a targeted mechanism for the Agency to obtain additional information from one or more registrants where the reduced dataset provided at initial registration is considered insufficient for a particular regulatory assessment of a substance. This avoids requiring every registrant to submit the full standard dataset at the outset, while preserving the regulator's evidence gathering powers needed to protect human health and the environment and to support effective regulatory oversight.
48. Taken together, new Articles 127Q to 127U aim to balance the reduced upfront ATRm dataset requirement with a proportionate mechanism for obtaining and reviewing further evidence where a specific regulatory need is identified so as to uphold UK REACH's Article 1 requirement to ensure a high level of protection of human health and the environment.

Scope of the power

49. The new transitional evaluation power is intended to support the reduced upfront information requirements under the ATRm. It will apply where the reduced registration requirements for grandfathered substances, existing intermediates, NRES and DUIN registrations are used. If the Agency considers that further information is needed to evaluate the potential hazards or risks of a substance or intermediate, it may use this power to require one or more registrants to provide that information under Article 127Q(1).
50. Where the Agency's transitional evaluation functions involve relevant environmental issues, it will be required to obtain and use advice from the Environment Agency. In turn, the Environment Agency will be required to collaborate with Natural Resources Wales and the Scottish Environment Protection Agency when preparing that advice, as required by Article 2B.
51. The Agency will also be required to report publicly on its transitional evaluation activity. New Article 127T(5) will apply the existing annual publication requirements in Article 54 to requests for further information made under new Article 127Q(1), final decisions under new Article 127S.

Information that may be requested

52. Where Articles 127B(4A), 127L(3)(b), 127M(3A), 127NA(3) or 127NB(3) apply, the Agency will have the discretionary power to request any item that would ordinarily be required under Articles 10, 12, 17 or 18 but has not previously been submitted to it, even where that information has already been provided to ECHA under EU REACH. This power is set out in new Article 127Q(2).

Chemical safety assessment

53. If the Agency's request concerns study summaries, robust study summaries or testing proposals, under the new power the Agency may also require the registrant to undertake a further chemical safety assessment to the extent necessary to provide the information and

to document the relevant assessment steps in the chemical safety report, as provided for by new Article 127Q(3).

Prioritisation

54. In deciding which dossiers to examine for transitional evaluation, it is proposed that the Agency should give priority, although not exclusively, to cases where classification information or information on isolated intermediates has been submitted separately, where the substance is included in the rolling action plan, or where it appears likely to meet the criteria for substance evaluation. This allows regulatory attention to be directed towards cases where additional scrutiny may be most useful in line with the aim and scope of UK REACH. These proposed prioritisation factors are set out in Article 127Q(4), and new Article 127Q(5) will require the list of dossiers under evaluation by the Agency to be made available to the appropriate authorities (Secretary of State, Scottish Ministers and Welsh Ministers) on request.

Decision making

55. Where it considers that further information is needed, the Agency will have to issue a draft decision identifying the information required and setting reasonable submission deadlines. Affected registrants will have 30 days from the day on which the notification is made to comment, and the Agency will have to consider those comments before making and notifying its final decision. The draft and final decision procedures are set out in proposed new Articles 127R and 127S.

Follow up

56. Registrants will be required to provide the required information sought by the Agency by the deadline set out in the final decision. The Agency will then be required to examine the information and has the discretion to issue further decisions where it considers it necessary, using the same draft decision, comment and final decision process. These follow up requirements are set out in new Article 127T.

Timing, appeals and enforcement

57. The Agency will be required to complete its evaluation within 12 months of the requested information being submitted and if that deadline is exceeded, the evaluation will be treated as finished, under Article 127T(3) and (4).
58. Transitional evaluation decisions may be appealed by registrants in accordance with the existing appeals process from Articles 91, 92 and 93, as provided for by new Article 127U. The SI will also amend the REACH Enforcement Regulations 2008 so that failure to comply with a transitional evaluation decision is enforceable.

Cessation and recommencement

59. Under ATRm, if a registrant ceases manufacture or import before or after receiving a draft transitional evaluation decision, they are required to notify the Agency. Where the Agency has been notified, the registered volume is reduced to zero and no further information will be able to be requested by the Agency. The Agency's power may then be applied again if

manufacture or import recommences. These proposed arrangements are set out in new Article 127R(4) to (6).

Use and exposure information

60. The ATRm will retain the use and exposure information already required by UK REACH, but we no longer propose to introduce the additional registration requirements on use and exposure that were originally proposed in the 2024 consultation, for the reasons given in paragraph 7 above. Therefore, registrants will continue to be required to provide information on the manufacture and identified uses of a substance under Article 10(a)(iii). For substances registered in quantities of 1 to 10 tonnes per year, the exposure information required by Article 10(a)(x) and section 6 of Annex VI must also be provided where relevant.
61. Under ATRm, where a CSR is required under Articles 10(b) and 14(1), registrants will have to carry out and submit to the Agency the applicable chemical safety assessment. If the substance meets the hazard criteria in Article 14(4), or is assessed as PBT or vPvB, this submission would also have to include an exposure assessment, the development of exposure scenarios and risk characterisation for the registrant's identified uses.
62. The transitional provisions in Article 127B and new Article 127NA substantially preserve these existing requirements within the reduced ATRm dataset, including the relevant use information, exposure assessment and risk characterisation. For isolated intermediates, Articles 17 and 18 and the corresponding transitional provisions will continue to require registrants to submit to the Agency a brief description of use, details of the risk management measures applied or recommended and confirmation that the intermediate is handled under strictly controlled conditions.
63. The effect of the new SI drafting is that businesses will continue to provide the use and exposure information required to be submitted under the existing UK REACH framework, while avoiding the additional standalone dataset that was consulted on in 2024.

Substance groups, data sharing and joint submission of data

64. The ATRm aims to introduce a clearer framework for cooperation between businesses registering the same substance. Article 3(46) will define 'a substance group' as the forum through which registrants and potential registrants for the same substance exchange information and aim to agree classification and labelling. Article 25A will then apply requiring relevant registrants and potential registrants to participate in that group. The purpose of this new framework is to support registration, transitional registration and evaluation while avoiding unnecessary duplication of work and testing.

65. Within a substance group, participants will exchange the technical information relevant to their regulatory obligations. For substances other than intermediates, this will be primarily classification and labelling and, where applicable, study summaries, robust study summaries and testing proposals. Under ATRm it may also include guidance on safe use and chemical safety report information where registrants agree that one registrant, a 'lead registrant' will submit that information on behalf of the others.
66. For isolated intermediates, the information exchanged under ATRm will include classification and, where necessary, the physicochemical, human health and environmental information required under Articles 17 and 18. Additional information needed to respond to an Agency evaluation decision will also be required to be shared through the group.
67. New Article 127OA sets out how participants will be required to obtain and pay for information that is needed for a transitional registration or to respond to an Agency decision. It operates in a similar manner to Article 27, which applies to non-transitional registrations and will not be amended by this SI. The SI will amend the Commission Regulation³ on joint submission and data and cost sharing to be clear that their scope also covers application of Article 127OA. Before submitting information, a registrant will be required to make enquiries of the other participants in its substance group as to whether that information is available. Where a participant owns the information, unless it has opted to submit information separately under Article 11(3) or Article 19(2), it must provide evidence of the cost, and the owner and relevant registrants must make every effort to agree cost sharing on a fair, transparent and non-discriminatory basis in line with Agency cost sharing guidance. Registrants will be required to contribute only to information that they must submit for their own registration requirements or in response to an evaluation decision relevant to their tonnage band.
68. Where the information is available outside the substance group, relevant registrants will be required to make every effort to agree access with the owner on terms acceptable to all in the substance group and divide the cost fairly. If information is not known to exist, or its owner will not provide access or evidence of cost, the relevant registrants would have to generate the information themselves. Under ATRm, only one new study should be carried out for each relevant information requirement. The registrants will have to make every effort to agree who will undertake the study, and if they cannot agree, the Agency will have the discretionary power to designate the registrant(s) that will do so. The other relevant registrants will be required to equally contribute to the cost and will be entitled to receive the information from the other registrant within two weeks once payment has been made.
69. The amended Article 25(3) will allow study summaries and robust study summaries to be used by another manufacturer or importer where they were submitted under UK REACH, or

³ [Commission Implementing Regulation \(EU\) 2016/9 of 5 January 2016 on joint submission of data and data-sharing in accordance with Regulation \(EC\) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals \(REACH\) \(Text with EEA relevance\)](#)

were owned by a registrant and submitted under EU REACH before IP completion day, at least 12 years previously. They may be able to be used to support a registration or to respond to a transitional evaluation decision under new Articles 127S or 127T. This will help avoid unnecessary duplication of studies and testing.

70. These new data sharing rules will operate alongside the existing joint submission requirements in Articles 11 and 19. Article 11 applies to standard substance registrations, while Article 19 applies to on-site and transported isolated intermediates. Under both Articles, specified information is normally submitted by a lead registrant acting with the agreement of the other assenting registrants. Each registrant remains responsible for submitting the information that is specific to its own identity, manufacture or import, uses and risk management measures.
71. The proposed new route-specific provisions in Articles 127B(4F), 127L(4), 127M(4), 127NA(8) and 127NB(6) will adapt the joint submission rules to the information required under each transitional route. They specify which classification information, consistency statements, study information and chemical safety information registrants will be required to submit jointly, which information must be submitted separately by each registrant, and which information may be submitted either jointly or separately by agreement.
72. As with the existing rules, a registrant may submit specified information separately where joint submission would be disproportionately costly, would disclose commercially sensitive information and is likely to cause substantial commercial detriment, or where the registrant disagrees with the lead registrant about the selection of the information. In those circumstances, the registrant will have to explain to the Agency the reason for submitting separately. The principle in Article 25(2) will continue to apply: cooperation is concerned with technical information and registrants shall refrain from the exchange of information about market behaviour, such as production capacity, sales volumes, import volumes or market share.
73. Where the Agency designates which registrant in a group must perform a study because the relevant registrants cannot agree that decision may be appealed in accordance with the existing appeals procedure from Articles 91, 92 and 93. This right of appeal will be provided for by new Article 127OA(10).
74. Together, the new provisions in line with existing arrangements are intended to make the information needed for UK REACH registration available efficiently, minimise unnecessary and duplicate testing, and allocate costs fairly, transparently and in a non-discriminatory way between those that need the information, including the Agency. The new framework will also preserve each registrant's responsibility for meeting its own legal obligations and provide safeguards where joint submission is not considered to be appropriate.

Fees

75. No fee will be payable for submitting the outstanding information required for transferred GB registrations and existing isolated intermediate registrations under the proposed transitional arrangements. For transferred GB registrations, this exemption will apply to information submitted under new Article 127B(4)(b) or the reduced ATRm requirements in new Article 127B(4A), as provided by new Article 127B(4F).
76. The same approach will also apply to classification information and consistency statements submitted for existing on-site isolated intermediates under new Article 127L(3)(b), and to information submitted for existing transported isolated intermediates under new Article 127M(3)(b) or (3A), as provided by new Articles 127L(4) and 127M(4). These proposed exemptions aim to avoid the Agency charging registrants a further submission fee for completing registrations that are being transferred from EU REACH and being brought into line by way of following the transitional UK REACH requirements.

Audience

1. This is a technical consultation, and we welcome all views, particularly those from chemical businesses, downstream users of chemicals and NGOs. The questions are presented in such a way as to effectively accommodate both a general audience with an interest in this area and stakeholders with more specialist knowledge on the regulation of chemicals.

Responding to this consultation

2. Please respond to this consultation in one of the following ways:

Online using the [Smart Survey consultation hub](#) at Defra. For ease of analysis, responses via the Smart Survey platform would be preferred, if at all possible, but alternative options are provided below if required and we will accept email and hard copy responses for those unable to use the online survey for their response. Please get in touch via the details provided if you have any accessibility requirements relating to this publication:

By email to: REACHdefra.gov.uk@defra.gov.uk

By post:

UK REACH Legislation and Policy team,
Defra Ground Floor, Seacole Building,
2 Marsham Street,
London, SW1P 4DF

Duration

3. This consultation will run for a period of 6 weeks. The consultation opened on 29 September 2026 and closes on 10 November 2026. Please note, any responses sent by post must arrive at the above address by the closing date of the consultation to be counted. Any responses received after midnight on this date may not be considered.

Confidentiality and data protection information

4. Defra will act as the main point of contact for the purpose of managing this consultation. How we use your personal data is set out in the [consultation exercise privacy notice](#).
5. A summary of responses to this consultation will be published on the UK Government website at: www.gov.uk/defra. An annex to the consultation summary will list all organisations that responded and what part of the UK they represent but will not include personal names, addresses or other contact details.
6. Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (such as home address, email address).
7. If you click on 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in response to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)).
8. We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.
9. If you click on 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we will not make your personal name and private contact details publicly available.

10. There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data, with external analysts. This is for the purposes of consultation response analysis and the provision of a report of the summary of responses only.

Compliance with the consultation principles

11. This consultation is being conducted in line with the Cabinet Office “Consultation Principles” and can be found at: <https://www.gov.uk/government/publications/consultation-principles-guidance>. These principles give clear guidance to government departments on conducting consultations

If you have any comments or complaints about the consultation process (as opposed to issues which are the subject of the consultation), please address them by e-mail to: consultation.coordinator@defra.gov.uk. To meet with Defra’s service standard, we aim to respond to all complaints within 15 days of receipt.

Consultation Questions

The consultation questions are divided into two parts. Part One asks standard questions about you, your organisation and how you would like your response to be handled. These questions help us understand who has responded and support the proper management and analysis of consultation responses.

Part Two contains technical questions about the proposed legislative drafting for the ATRm. These questions are intended to help identify whether the draft provisions clearly and accurately give effect to the policy intention, and whether there are any drafting issues, omissions, ambiguities or unintended consequences that should be addressed before the SI is finalised.

You do not need to answer every question. Please respond only to the questions that are relevant to your knowledge, experience or interests, and provide examples, evidence or practical scenarios where this would help explain your views.

Part one: standard consultation questions

Confidentiality and some details about you

1. Would you like your response to be confidential? (required)

☐ Yes

☐ No

If you answered Yes to this question, please give your reason.

2. What is your name?

3. What is your email address?

If you enter your email address, then you will automatically receive an acknowledgement email when you submit your response.

4. Are you responding as an individual or on behalf of an organisation?

- ☐ Individual
- ☐ Organisation

5. What type of organisation are you responding on behalf of?

- ☐ A government body
- ☐ Non-governmental organisation (NGO)
- ☐ Local authority
- ☐ Charity
- ☐ Consultancy
- ☐ Small or micro business (Less than 50 employees, including any global operations)
- ☐ Medium business (50 to 249 employees, including global operations)
- ☐ Large business (250 or more employees, including global operations)
- ☐ Industry association
- ☐ Other

If you answered Other, please state your organisation type.

6. If you are responding on behalf of an organisation, what is the name of the organisation?

7. For organisations that have legal responsibilities as a result of UK REACH, what is your role? (Select all that apply)

- ☐ Only Representative (OR)
- ☐ Manufacturer of substances
- ☐ Importer of substances and/ or mixtures from the EU or EEA
- ☐ Importer of substances and/ or mixtures from Northern Ireland
- ☐ Importer of substances and/or mixtures from RoW
- ☐ Exporter of substances from Great Britain to the EU or EEA
- ☐ Exporter of substances from Great Britain to RoW
- ☐ Downstream user of chemical substances (companies who directly handle chemical substances in the course of their business activities and are not themselves the Great Britain -based manufacturer or importer of the substances)
- ☐ Not applicable
- ☐ Other, please specify:

Part two: ATRm policy proposals and consultation questions

The general policy approach for the ATRm was confirmed in the March 2026 government response to the [previous 2024 consultation](#). The questions below focus on whether the

drafting demonstrated in the Keeling Schedule presented with this consultation clearly and accurately gives legal effect to the policy intentions set out in that response and this consultation, and whether any drafting issue, omission, ambiguity or unintended consequence appears to be present in the drafting which needs to be addressed before the SI is finalised.

Responses are welcomed from respondents on the effectiveness and clarity of the proposed drafting, its relation to the policy intention and, where appropriate, on the policy approach in general.

We are not asking simple "Yes/No" questions about agreement with the drafting. The technical nature of this consultation means that we need clear indications of why and how particular drafting may need some reconsideration.

Wherever possible, please provide examples, scenarios or evidence to support your comments

Hazard information under Article 127B

8. Does the proposed drafting in Article 127B clearly and accurately specify the information that must be submitted for transferred GB registrations where the reduced requirements apply?

Please identify any potential ambiguity, unintended consequence or drafting issue.

9. Do the eligibility conditions in Article 127B clearly identify the circumstances in which the reduced information requirements apply?

Please identify any potential ambiguity, unintended consequence or drafting issue.

10. Are the classification consistency requirements in Article 127B clear and operable?

In particular, please identify any potential uncertainty regarding the applicable comparator, the information to be provided, or the circumstances in which an explanation must be given.

11. Do the links between the reduced information requirements in Article 127B and the transitional evaluation powers in Articles 127Q to 127U read clearly and without unintended gaps?

Please identify any potential drafting issue, ambiguity or unintended consequence.

Chemical safety assessments and chemical safety reports

12. Does the proposed drafting clearly and accurately capture the chemical safety information and assessment outcomes that registrants must provide under Articles 127B(4C) to (4E) and 127NA(5) to (7)?

In particular, please identify and explain any potential inconsistency or omission.

13. Do the eligibility conditions in Article 127NA clearly identify the circumstances in which the reduced information requirements apply?

In particular, please explain any potential unintended effect or other comments.

NRES and registrations following a DUIN

14. Does the proposed drafting of Article 127NA clearly and accurately define the registrants and registrations within scope and the registration information required?

Please identify any potential ambiguity, unintended consequence or drafting issue.

On-site and transported isolated intermediates

16. Does the proposed drafting of Articles 127L, 127M and 127NB clearly and accurately specify the information required for existing and new on-site and transported isolated intermediate registrations?

Please identify any potential ambiguity, unintended consequence or drafting issue

17. Does the condition determining whether Article 18(3) information is required for transported isolated intermediates read clearly?

Please identify any potential ambiguity, unintended consequence or drafting issue

Transitional evaluation powers

18. Does the proposed drafting of Articles 127Q to 127U provide a clear and workable process for requesting, deciding on, submitting and reviewing additional information where the reduced dataset is insufficient in line with the policy intention?

Please identify any potential drafting issue, ambiguity or unintended consequence.

19. Do the proposed prioritisation criteria for transitional evaluation dossiers in Article 127Q read clearly?

Please identify any potential drafting issue, ambiguity or unintended consequence.

20. Do the provisions in Article 127R governing draft transitional evaluation decisions provide a clear and workable process for registrants?

Please explain any potential drafting concerns or other comments.

21. Do the provisions in Article 127R on cessation and recommencement of manufacture or import during the transitional evaluation process read clearly and as intended?

Please identify any potential drafting issue, ambiguity or unintended consequence.

22. Do the proposed time limits in Articles 127R and 127T for the transitional evaluation process provide a workable framework for regulators and registrants?

Please identify any potential drafting issue, ambiguity or unintended consequence.

Substance groups, data and cost sharing, and joint submission

23. Does the proposed drafting of Articles 3(46), 25A and 127OA clearly establish who will be required to participate in substance groups and how information, access rights and costs need to be shared for registration and evaluation purposes?

Please identify any potential drafting issue, ambiguity or unintended consequence.

24. Do amended Articles 11 and 19, as modified for each transitional route, clearly describe the arrangements applying to joint and separate submission?

In particular, please identify any potential drafting ambiguity, omission or unintended consequence.

25. Do the proposed cost-sharing provisions in Article 127OA clearly and effectively provide for the allocation of costs on a fair, transparent and non-discriminatory basis?

In particular, please identify any potential drafting ambiguity, omission or unintended consequence.

Fees

26. Do the proposed fee exemptions in Articles 127B(4F), 127L(4) and 127M(4) clearly identify the transitional information submissions for which no fee is payable?

In particular, please identify any potential drafting ambiguity, omission or unintended consequence.

Other comments

27. Are there any provisions within the proposed drafting that you believe could create unintended practical, legal or operational consequences that are not addressed elsewhere in your response?

Next Steps

Following this consultation, we will publish a summary of responses, a government response and, subject to the responses, finalise the SI.

The SI will follow the affirmative procedure in the Houses of Parliament. This means it will be laid in Parliament for scrutiny and will be debated in both Houses. It may only be subsequently made following approval by Parliament.