October 2024

**REACH REGULATION UPDATE**

Dear Customer,

Tetrosyl UK only sources chemicals or “substances” which are REACH compliant. (Regulation 1907/2006 EC of 18th Dec 2006).

These are registered in the EU for use in products. This was the case before Brexit, and still continues after Brexit.

Tetrosyl Ltd is a Downstream User (DU) and therefore is not involved directly in the REACH registration process. We have however sought and obtained confirmation from our upstream producers and suppliers that registration has taken place for each of their respective products. Some of these chemicals originate from the UK but are still registered under EU-REACH and our producers will take the necessary steps to ensure these EU registrations continue and are still valid in the future. Please be assured our products were REACH compliant prior to BREXIT, and will remain so post BREXIT.

After Brexit, our suppliers/producers have additional responsibilities to ensure that chemicals/commodities are EU-REACH compliant, but also a new UK-REACH compliant. Chemicals/substances which are EU-REACH compliant will in the future have to be compliant with the UK-REACH as well. These will need to be pre-registered under UK-REACH within 300 days of the end of the Withdrawal Agreement, and this will need to be followed up with a full registration under UK-REACH within either 2 years (if over 1000 tonnes of chemical per year), 4 years (100 tonnes or more per year) or 6 years (if over 1 tonne per year). This does not really concern the EU-27 as this will happen behind the scenes and will only affect UK regulatory compliance.

In terms of UFI numbers and registrations, we have been assigning numbers gained from the EU’s European Chemicals Agency ECHA. This is so we can add these UFI numbers to our products and follow that up in time with a full registration of our product at the ECHA/Poisons Centres. To gain an UFI number, no product submission is required at this stage. This can be added later to the ECHA Poisons Centre and is termed a PCN (Poison’s Centre Notification). UFI numbers and registrations are to be managed by our EU entity - Tetrosyl Europe, 59118, Wambrechies FRANCE EU, so that we have continuity and compliance in generating any necessary UFI numbers for our products.

Please note - although UFIs become active January 2021 for new submissions, there is a 4 year phase in period to 2025 for any existing products which we are managing.

Our software classification system remains EU-CLP compliant for product CLP labelling.

Should you require any additional information please do not hesitate to contact us.

Tetrosyl Group Limited