



**EtOH-REACH**  
Ethanol REACH Association

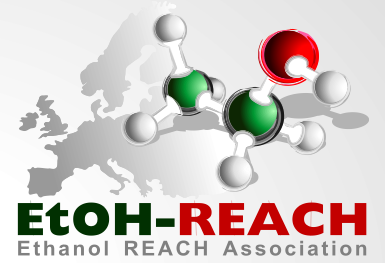
# UK REACH ethanol initial meeting

27 January 2022 | 15:00 CET

Online meeting

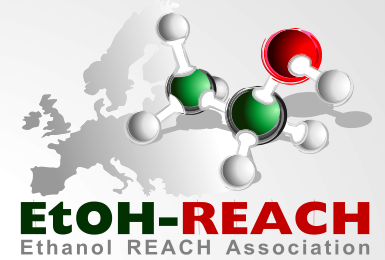
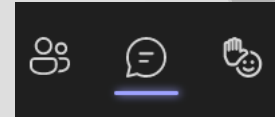
# 1. Welcome

- Pablo Englebienne, EtOH-REACH Secretary General
- Jeff Kelsey, EtOH-REACH Technical Advisor

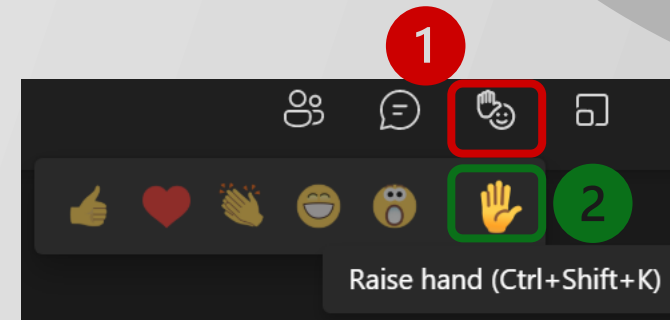


# Housekeeping

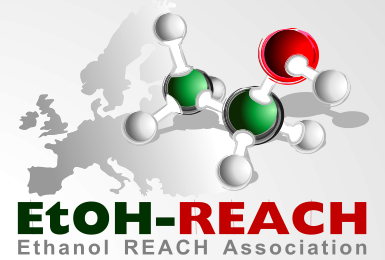
- Type question in meeting chat anytime



- Raise hand to speak in Q&A section



## 2. Competition Law Compliance



In order to protect the interests of individuals and member companies, while active within the Ethanol REACH Association (in the broadest sense), the Competition Law policy should always strictly be followed.

- 1) Do not discuss prices, (including price increases and pricing methods), discounts, terms of sale, the refusal to deal with another company, or profit margins with any representative of any Ethanol REACH Association member company;
- 2) Do not make announcements about your prices or those of competitors;
- 3) Do not talk about the plans of individual companies (yours or competitors') regarding specific geographic or product markets or regarding particular customers;
- 4) If in doubt consult the Associations' staff or legal counsel.

# Agenda



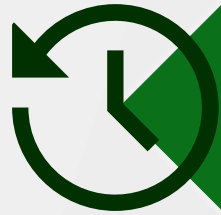
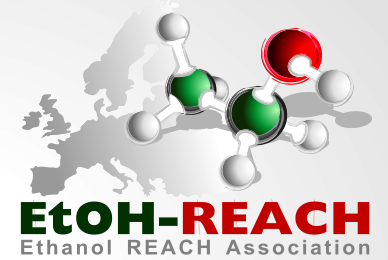
- |          |                                       |       |
|----------|---------------------------------------|-------|
| <b>1</b> | Opening and welcome                   | PE    |
| <b>2</b> | Competition Law compliance            | PE    |
| <b>3</b> | Background and scope                  | PE/JK |
| <b>4</b> | Organization of UK REACH registration | PE    |
| <b>5</b> | Finances of UK REACH Consortium       | PE    |
| <b>6</b> | Timeline                              | PE/JK |
| <b>7</b> | Q&A                                   | All   |
|          | Closure                               |       |



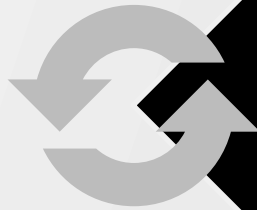
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Ethanol REACH Association

## 3. Background and scope

# The Ethanol-REACH Association



Prepared REACH registration dossier for ethanol submitted for the initial REACH deadline in 2010

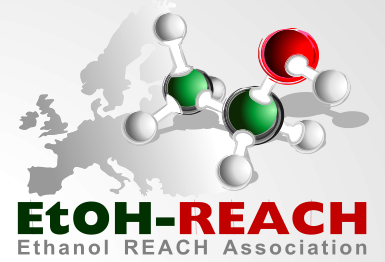


EtOH-REACH maintains and updates the dossier to keep up with regulatory requirements



> 770 ethanol registrants

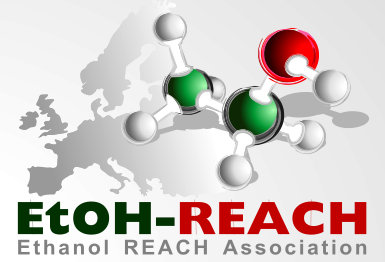
# UK REACH



- Came into force start of 2021
- Opportunities for grandfathering and DUVN submissions now closed
- Anyone who missed above will now need to submit an inquiry dossier and then a registration before they can manufacture in or import into Great Britain



# UK REACH



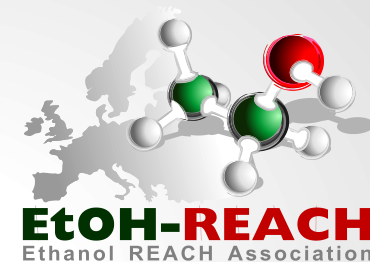
- Phase in period for ethanol/associated substances
  - >1000tpa + 2 years from end of DUIN notification period
  - 100-1000tpa + 4 years from end of DUIN notification period
  - <100tpa + 6 years from end of DUIN notification period
- Ethanol current status (24/01/2022):
  - 61 grandfathered
  - 5 inquiries

Deadlines and even data requirements  
may be subject to change



## 4. Organization of UK REACH registration

# Organization



**EtOH-REACH**

Consortium Management

**Ethanol**

REACH

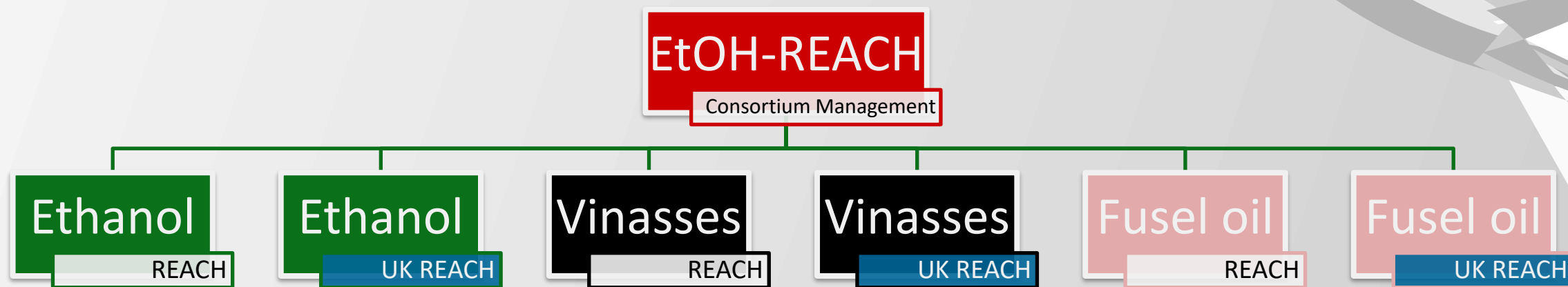
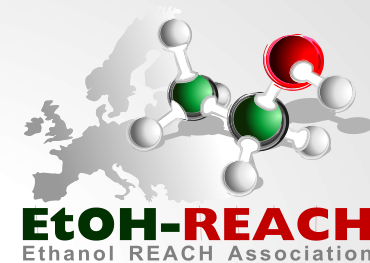
**Vinasses**

REACH

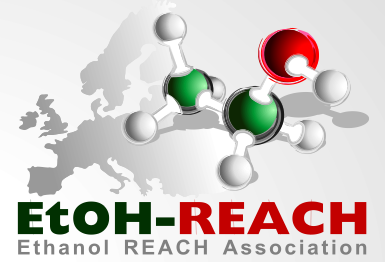
**Fusel oil**

REACH

# Organization



# Lead Registrant

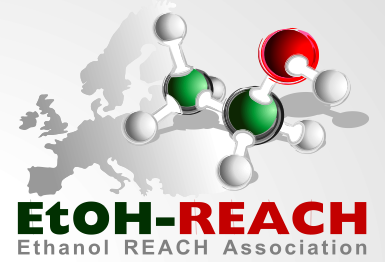


- **Cargill UK** volunteered to act as LR for ethanol under UK REACH
- Online survey to be sent after this meeting for approval of this nomination



## 5. Finances of UK REACH Consortium

# Mutual recognition of existing registrants

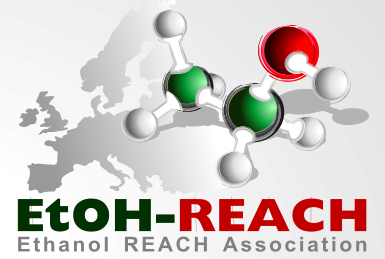


- **Principle**

- Up to one registration in UK REACH for every membership/LoA held for a substance previously in EU REACH
- **Existing GB registrants** (who transferred to a EU-based LE) can use the data free of charge\* for the same tonnage band
- **Existing EU- or NI-based registrants** who wish to appoint an OR or use a single distributor in GB to submit a registration can use the data free of charge\* for the same tonnage band

\*a small administration fee will be levied

# New registrants under UK REACH



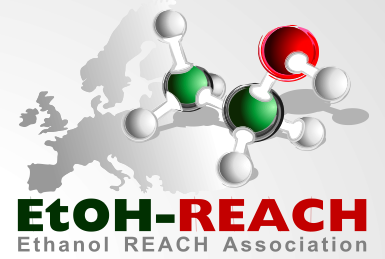
- Former UK-based DU who are now importers under UK REACH
- New registrants under UK REACH, previously relying on EU suppliers for REACH registration

Pay for LoA/membership fee at same level as current REACH registrants

- Gain access to both UK and EU REACH registrations
- Data requirements for UK REACH compliance are identical to EU REACH at this moment



# Funding



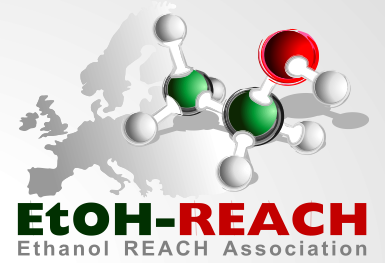
- EU ethanol consortium to seed money to UK consortium to cover initial costs, to be paid back after income is generated upon registration under UK REACH
- All UK REACH registrants (existing or new) will be charged an administrative fee to cover consortium costs (analogous to EU-REACH: ~€250)
- Fee structure: Same as EU
  - 1-100 | 100-1000 | >1000 tpa



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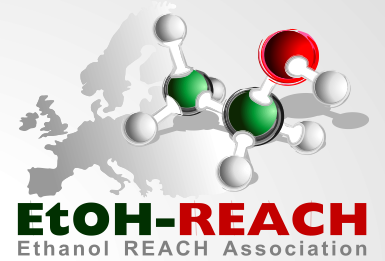
## 6. Timeline

# Joint registration agreements



- Draft UK REACH ethanol consortium agreement
- Amendment of EtOH-REACH bylaws as needed
- **Target**
  - UK REACH Ethanol consortium agreement finalized Q3 2022

# Dossier preparation & submission



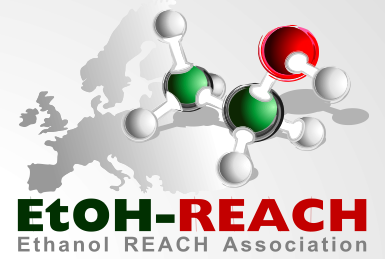
- Assumption that the current EU REACH dossier can be used for UK with minimal changes
- New jointly submitted CSR will be required to reflect UK market size
- **Target**
  - LR dossier ready for submission early Q4 2022
  - Co-registrant templates available end of Q4 2022



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## 7. Q&A

# Q&A



- Late DUIN notifications

- Deadline flexible, eligible notifiers can in principle still do it
- According to [HSE website](#):

*If you did not notify HSE and wish to continue to import EU REACH registered substances into Great Britain at or above one tonne per year, you can still submit a notification, if eligible to do so. You should do this as soon as possible.*

- Late Grandfathering

- Contact [HSE Helpdesk](#) for options

# Q&A



- Deadline extensions for dossier submission
  - Discussion ongoing between UK government and chemical industry; extension possible by at least 1 year
    - [News item](#)
    - [Letter from Secretary of State for Environment, Food and Rural Affairs to Chemical Industry Association](#)

# Q&A

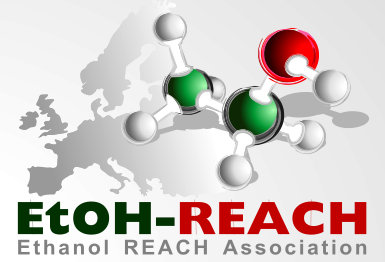


- Current EU fee structure for ethanol
  - On the [EtOH-REACH website](#)

Ethanol substance tonnage	Membership/Letter of Access cost
<100 tonnes per year	€420 + €250 handling fee*
100-1000 tonnes per year	€1400 + €250 handling fee*
>1000 tonnes per year	€14000 + €250 handling fee*

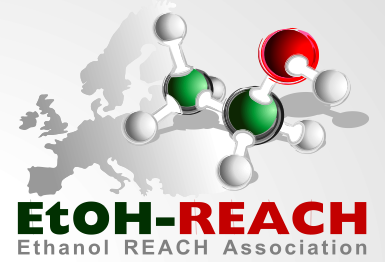


# Q&A



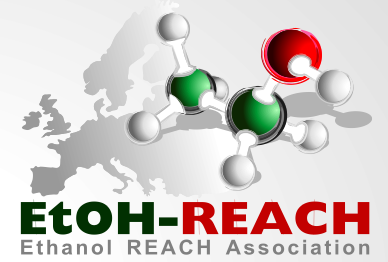
- When will Cargill claim the Lead role?
  - Unlike it was the case in EU REACH, it is not possible to claim the LR role in UK REACH ahead of registration. The LR submits the dossier first, and then claims role; other potential registrants have the possibility of objecting to their role
  - The LR role of Cargill will be surveyed by an online survey among participants to this meeting and confirmed officially once the LR dossier is submitted. This will ensure clarity of roles

# Q&A



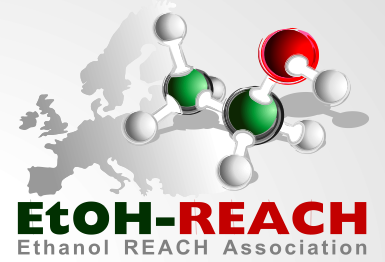
- Our experience as a UK OR is that some companies wish to register early to manage their portfolio. Do you agree for them it is OK to start now with the Inquiry?
  - Yes, there is nothing to lose with starting the process now, and you get to see who else intends to register
  - Analytical data used for the submission under EU-REACH can be used for the UK REACH inquiry

# Q&A



- Will different affiliates be able to be covered under the same LoA or each LE will need to buy its LoA?
  - Each affiliate/legal entity will need to arrange for their own letter of access, as is the case for the EU REACH consortium
  - For each existing EU REACH registrant, it will be possible to nominate an affiliate, distributor or OR in the UK to hold the UK REACH registration

# Q&A



- Should you have any further inquiries, please contact us at

[mail@etoh-reach.com](mailto:mail@etoh-reach.com)



**EtOH-REACH**  
Ethanol REACH Association

**Thank you for your  
participation!**