The Rt Hon John Healey MP
Chancellor of the Exchequer
HM Treasury
1 Horse Guards Road
London
SW1A 2HQ

The Rt Hon Dame Angela Eagle DBE MP
Secretary of State for Environment, Food and Rural Affairs
Department for Environment, Food & Rural Affairs
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BY EMAIL

19th November 2026

Dear Chancellor and Secretary of State,

We, the undersigned, trade associations and trade unions, are greatly concerned about the design of UK legislation on the Registration, Evaluation, Authorisation and restriction of Chemicals (REACH).

As currently proposed, its implementation will have a devastating impact not just on the country's chemicals sector, but also further downstream on the competitiveness of broader UK manufacturing including automotive, defence, pharmaceuticals, health, biotechnology, energy, water treatment, construction, food production, and packaging.

Ultimately, the policy will undermine any moves towards reindustrialisation, contribute to more factory closures, job losses, declining innovation and exports. There is a substantial risk that suppliers may withdraw substances from the GB market where registration costs and complexity outweigh the commercial value of continued supply.

The Department for Environment, Food and Rural Affairs (Defra) is now consulting on draft legal provisions to implement the Alternative Transitional Registration model (ATRm) for UK REACH. Defra's own estimates put the cost of this to industry at a minimum of £600 million. This is just to maintain the availability and supply of existing chemicals on the UK market – as has been the case since Brexit – without bringing new investment or new products, or delivering any additional benefit to the environment, health, or resilience of our nation. In practical terms, where hazard information has already been generated or assessed under EU REACH, requiring it to be purchased or reproduced would again create an additional burden undermining competitiveness.

The wholesale registration of thousands of chemical substances is now unnecessary. The Government's own Environmental Improvement Plan (EIP), under commitment 40, has signalled that it will follow decisions made by the European Union under EU REACH, in all but the most exceptional cases. We support this pragmatic approach. However, if EU decisions are generally to be followed, it begs the question why Defra needs to collect duplicative and redundant registration data that is

already made available by virtue of existing EU REACH Registrations. Furthermore, businesses are already required under existing legislation to understand, communicate and manage information relating to hazards, risks and the safe use of substances in order to protect workers, consumers, and the environment. Equally, imposing this substantial new regulatory burden at the very moment the

Government has committed, through its Regulation Action Plan, to cutting administrative costs for business by a net 25% is both contradictory and damaging to its wider growth ambitions.

Baseline information for chemicals, including the identity, quantity, hazard classification and principal GB uses, could still be required and submitted by business. In rare circumstances when Defra or the Health and Safety Executive (HSE) as regulator require data on a particular substance of concern, industry would fully support the provision of such data. This would ensure that regulators have access to the information they need while avoiding a costly and disproportionate requirement for the wholesale registration of thousands of substances.

Defra points to a 70% reduction in anticipated UK REACH registration costs compared to its initial plans that were consulted on. However, businesses will still face hundreds of millions of pounds in new, additional costs that our EU neighbours and competitors will not have to bear. These come on top of high and rising domestic energy, labour and raw material costs. The UK market is only one-tenth the size of the EU's and the reality is many chemical companies will be unwilling or unable to justify the extra costs to access it if doing so is commercially unviable.

Chemicals provide essential inputs into more than 96% of manufactured products. So, the consequences extend far beyond the chemicals sector. If suppliers withdraw substances from the UK market rather than bear the registration costs, manufacturers could lose access to essential inputs. This could force downstream products off the market, reduce customer choice, add cost, and threaten the viability of UK production. Substitution is not simply a purchasing decision: it would require time and technical assessment.

As mentioned above, the implications are particularly serious for automotive, defence, pharmaceuticals, health, and energy, as well as water treatment, construction and food production. These sectors underpin national security, public health and critical national infrastructure, and many are central to the Government's Modern Industrial Strategy under the Advanced Manufacturing, Clean Energy Solutions, Life Sciences and Defence action plans.

Reduced availability of essential chemicals risks weakening the domestic manufacturing base, increasing reliance on imported finished products and undermining the resilience of critical supply chains. A narrower range of available substances would also constrain businesses' ability to develop new products, adopt alternative materials, and innovate, undermining the UK's industrial ambitions and long-term competitiveness.

UK manufacturing stands ready to support the Government's reindustrialisation agenda and driving growth and prosperity across all parts of the country. It is well placed to do so, given the location of the sector throughout the regions and the above average wages paid for doing a huge variety of good, meaningful jobs. A strong UK chemicals sector is essential to that ambition. Allowing it to diminish undermines the very foundations on which industry depends.

We urge you to intervene and prevent Defra's policy of needlessly collecting data that imposes substantial costs without delivering any discernible benefit to either human health or the

environment. Instead, it risks further site closures, job losses, and reduced innovation, driving further deindustrialisation rather than the reindustrialisation that the Prime Minister, and all of us, seek.

Yours sincerely



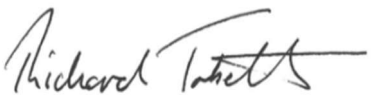
For and on behalf of the Alliance of Chemical Associations

Mr Tom Bowtell, Chair of the Alliance of Chemical Associations
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cc:

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Emma Hardy MP	Minister for Chemicals, Defra
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Blair McDougall MP	Minister for Reindustrialisation, DBIST
Rt Hon Sir Stephen Timms MP	Minister of State, DWP
Rt Hon Liam Byrne MP	Chair, Business Select Committee
Alistair Carmichael MP	Chair, EFRA Select Committee
Rt Hon Victoria Atkins MP	Shadow Environment Secretary
Andrew Griffith MP	Shadow Chancellor
Amanda Brooks	Permanent Secretary, DBIST
Beccy Eggleton	Director of Materials, DBIST
Marc Casale	Director of Chemicals, Defra
Sarah Albon	CEO, HSE
Varun Chandra	Business Advisor to the Prime Minister

Please see full list of Industry signatories and recipients below and overleaf.





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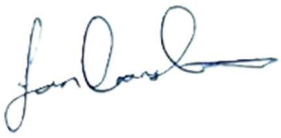
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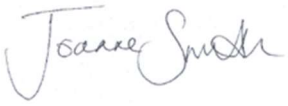
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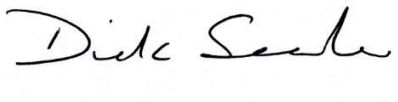
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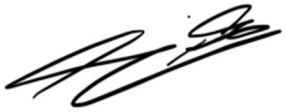
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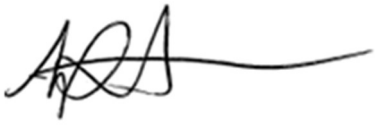
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