



January 2024

Dear Customer,

The agreement between the UK and the European Union regarding Brexit ended on December 31, 2020. The UK implemented its own REACH program on January 1, 2021, with additional transition period for compliance¹. As part of the UK REACH implementation, UK companies located outside Northern Ireland that held EU REACH registrations in the two years prior to 31 December 2020, were entitled to grandfather them into UK REACH and Downstream users transitioning to importers of existing substances could nominate their substances submitting UK REACH Downstream User Import Notifications (DUINs). The regulation update known as "REACH (Amendment) Regulations 2023"² extended the transitional provision for DUINs and registration deadlines by 3 years.

Dow has successfully grandfathered its own registrations and submitted DUINs where we are the importer of record, meeting the necessary UK REACH regulatory conditions. Additionally, we have filed direct registrations for new supply chains.

Customers buying Dow products from our local UK sales organisations under duty paid conditions remain downstream users under the new UK REACH regime, Dow will be the importer of record for those products and will file the required notifications under UK REACH.

Dow will assess the possibility of providing Only Representative (OR) coverage based on DUINs until at least October 2026 for our products upon receiving your request through our website. Due to certain supply chain constraints, achieving this may not be feasible for every product. It is essential to understand that if a customer has not imported the substance(s) in the two years leading up to the implementation date (2019/2020), OR-coverage under DUINs is not allowed by the transitional provisions. Additionally, decisions for a substantial number of our products depend on the feedback from our own suppliers, which means we might not be able to offer a conclusive answer for each product short notice. Where we are able to offer OR coverage, Dow is using a Third-Party Trustee process and official coverage documents. Please note that as for EU coverage there will be costs associated with the provision of this service. For further information and coverage requests please consult our website [Indirect Imports \(dow.com\)](https://www.dow.com/indirect-imports).

Due to the uncertainties of the final registration process (e.g. ATR model³), we will have to re-evaluate all our substances prior to taking a final decision whether or not a substance will be registered under UK REACH within the provided timelines and whether OR coverage will be offered beyond October 2026. Therefore, **this letter does not confirm that Dow will register any substances under UK REACH by the registration deadlines or offer OR coverage for your products.** Dow will develop its UK REACH registration strategy over the coming years. Should you require further information about this letter or other aspects of Brexit on your product supply, please do not hesitate to contact your account manager or submit your request via our contact form: [Customer Support | Dow Inc.](#) Please note this letter does not represent any commitment by Dow to supply product to you.

Yours sincerely,

John Case
Regional President UK & Ireland

¹ [UK Guidance on how to comply with Reach chemical regulations](#)

² [The REACH \(Amendment\) Regulations 2023 \(legislation.gov.uk\)](#)

³ [UK REACH: alternative transitional registration model \(ATRm\) - GOV.UK \(www.gov.uk\)](#)

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