

# UK AND EU CHEMICAL INDUSTRIES CALL FOR THE IMPLEMENTATION OF THE CHEMICALS ANNEX UNDER THE EU/UK TCA

December 2025



In a challenging geopolitical and economic environment, it is critical to make full use of the trade agreements in place. In the field of chemicals and cosmetics, the EU/UK Trade and Cooperation Agreement (TCA) provides for such an opportunity through the Chemicals Annex. Turning this existing commitment into a functioning mechanism would give the chemicals and cosmetics sectors on both sides a more predictable, efficient and resilient basis for our highly integrated markets.

In 2024, EU exports of chemical products to the UK were worth over £44 billion, making the UK the EU's third largest export market for chemicals<sup>1</sup>. The EU is the UK's largest trading partner for chemicals, with 66% of UK chemical imports originating from the EU<sup>2</sup> and UK exporting almost 60% of its chemical products to the EU in 2024. This strong interdependence underscores the need for continued cooperation and alignment in regulatory frameworks to support growth and competitiveness.

Therefore, the UK and EU chemicals and cosmetics industries strongly support structured regulatory cooperation on chemicals between the UK and EU. Such cooperation helps to lower regulatory costs and burdens by reducing duplication of data generation, review and assessment in both jurisdictions. Therefore, it is an important lever to boost EU- and UK-based businesses' confidence in continued investment in this important trading relationship. This will help to further boost trade and investment between the EU and the UK, supporting our industries' competitiveness.

## KEY POLICY ASKS:

- **Implement the provisions of the existing Annex on Chemicals which already exists within the EU/UK TCA.** This provides a solid legal and organisational basis for regulatory cooperation on chemicals between the UK and the EU.
  - Implement regulatory cooperation under the TCA in the form of **regular and structured meetings** between relevant regulators and agencies in both jurisdictions including, but not limited to Defra, HSE, Environment Agency, Department for Business and Trade and ECHA, DG GROW and DG Environment.
  - The scope of the regulatory cooperation on chemicals should cover **ongoing and emerging priorities** under horizontal chemicals frameworks; for example, the Classification, Labelling and Packaging (CLP) Regulation, as well as the Registration, Evaluation and Authorisation of Chemicals (REACH) Regulation.
  - An important area for regulatory cooperation is to include **exchanging of non-confidential information** between the two parties, in particular in emerging areas of interest for chemical

<sup>1</sup> Eurostat, September 2025, accessed 03.10.25 [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Trade\\_and\\_production\\_of\\_chemicals\\_and\\_related\\_products#Source\\_data\\_for\\_tables\\_and\\_graphs](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Trade_and_production_of_chemicals_and_related_products#Source_data_for_tables_and_graphs)

<sup>2</sup> Cefic, Landscape of the European Chemical Industry, accessed 03.10.25 <https://cefic.org/landscape-of-the-industry/united-kingdom/>

risks. Such information sharing will help build as robust and comprehensive scientific assessments as possible, on which policy decisions in both regions can be based. This will ensure the continuation of a high level of consumer and environmental protection, and it may contribute to **compatible chemicals regulations** in both territories which reduce duplication, costs and administrative burdens on EU- and UK-based companies.

- Information sharing is supported by Article 7 paragraphs 2 and 5 of the Chemicals Annex within the TCA, which state that: *“The Parties commit to facilitating the exchange of non-confidential information between their responsible authorities, including through cooperation on electronic formats and tools used to store data”* and *“If a Party so requests and the other Party agrees to do so, the Parties shall enter into consultations on scientific information and data in the context of new and emerging issues related to the hazards or risks posed by chemicals to human health or the environment, with a view to creating a common pool of knowledge and, if feasible and to the extent possible, promoting a common understanding of the science related to such issues.”*
- Defra’s [Policy Paper](#) on the ‘Rationale for Prioritising Substances in the UK REACH work programme: 2025 to 2026’ states that the strategic approach is *“to draw more from regulatory decision-making in other jurisdictions. This should enable new protections to be applied more quickly, more efficiently, and in a way which is more aligned with our closest trading partners. In doing so we can reduce business complexity and trade barriers and provide industry with the certainty they need to grow and invest, whilst continuing to protect people and the environment in the right way.”* Therefore, regulatory cooperation on chemicals between the UK and EU will fully support this strategic direction.
- Cooperation and monitoring on enforcement is covered by Article 395 of the UK/EU TCA, which requires the UK and the EU to *“cooperate on the effective monitoring and enforcement of environmental protection legislation”*.
- Regulatory cooperation should include the **sharing of knowledge and best practice on risk assessment approaches**. An example of this can include opinions and assessments for harmonised classification of chemicals; monitoring and identification of emerging chemical risks to ensure they are addressed to protect human health and the environment.
  - This is supported by Article 7 paragraph 3 of the Chemicals Annex within the TCA states that: *“The Parties shall cooperate where appropriate with a view to strengthening, developing and promoting the adoption and implementation of internationally agreed scientific or technical guidelines, including, where feasible, through the presentation of joint initiatives, proposals and approaches in the relevant international organisations and bodies.”*
- Another key area for collaboration between EU and UK regulators is on **non-animal New Approach Methodologies (NAMs) and Next Generation Risk Assessment (NGRA)** for chemicals safety assessment. This is an important topic for both regulators and regular sharing of expertise will support both regions in their ambitions to be global leaders in the **development, regulatory acceptance and uptake and industry use of scientifically valid and harmonised non-animal NAMs**. In particular, the two jurisdictions can share best practices in hazard and exposure assessment using non-animal NAMs, as well as collaboration in harmonising and standardising such methods for regulatory adoption and acceptance in both markets. This becomes relevant not just for REACH, but also for classification of chemicals under the CLP Regulation. A clear example of this is a recent statement<sup>3</sup> from the UK Committee on Carcinogenicity (COC), who is gathering evidence to develop an improved approach to assessing risk of cancer caused by chemicals through better use of existing available data, as well as the use of NAMs.

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<sup>3</sup> COC Guidance Statement G11 <https://assets.publishing.service.gov.uk/media/686fe32fa08d3a3ca3b67a6f/case-for-change-the-challenge-to-develop-a-better-approach-to-assessing-risk-of-cancer-caused-by-chemicals.pdf>

- Sharing evidence, knowledge and best practice between regulators from both jurisdictions can support collaboration in **regulatory management options** that protect human health and the environment, maintaining compatible high standards in both markets.

### **WHY REGULATORY COOPERATION ON CHEMICALS SUPPORTS BUSINESS GROWTH AND COMPETITIVENESS IN THE UK AND EU:**

The table below highlights how regulatory cooperation on chemicals between the UK and the EU will contribute to businesses competitiveness and growth.

<b>Advantages for EU businesses</b>	<b>Advantages for UK businesses</b>
<ul style="list-style-type: none"> <li>• Compatible regulatory frameworks e.g. for REACH and CLP reduce regulatory costs of EU exports to GB.</li> <li>• Close relationship will increase EU businesses' confidence in growing their UK exports.</li> <li>• Helps to reduce regulatory cost and administrative burdens; this can unlock resources for research and innovation.</li> <li>• Increased possibility to have finished products suitable for sale in both markets, resulting in cost-efficient manufacturing and supply chain processes.</li> </ul>	<ul style="list-style-type: none"> <li>• Continuing vital import of chemicals into GB for consumer product manufacturers, which means they can continue manufacturing in GB.</li> <li>• Compatible regulatory frameworks e.g. for REACH and CLP reduce regulatory costs of imports of EU chemicals into GB.</li> <li>• Maintaining smooth trade within the UK internal market, between GB and Northern Ireland.</li> <li>• Helps to reduce regulatory cost and administrative burdens; this can unlock resources for research and innovation.</li> <li>• Increased possibility to have finished products suitable for sale in both markets, resulting in cost-efficient manufacturing and supply chain processes.</li> </ul>

### **LIST OF CO-SIGNATORIES**

[Association of the European Adhesive & Sealant Industry](#) (FEICA)

[British Aerosol Manufacturers' Association](#) (BAMA)

[British Adhesives and Sealants Association](#) (BASA)

[British Chemicals Association](#) (BCA)

[British Coatings Federation](#) (BCF)

[British Compressed Gases Association](#) (BCGA)

[European Chemical Industry Council](#) (Cefic)

[Chemical Industries Association](#) (CIA)

[Cosmetics Europe](#)

[Cosmetic, Toiletry and Perfumery Association](#) (CTPA)

[European Federation for Construction Chemicals](#) (EFCC)

[European Association of Chemical Distributors](#) (FECC)

[European detergents & maintenance products industry association](#) (AISE)

[European Federation for Cosmetic Ingredients](#) (EFFCI)

[International Fragrance Association](#) EU and UK (IFRA)

[Solvents Industry Association](#) (SIA)

[UK Cleaning Products Industry Association](#) (UKCPI)

[UK Lubricants Association](#) (UKLA)