



**Royal Society of Chemistry**  
Thomas Graham House  
Science Park, Milton Road  
Cambridge CB4 0WF, UK

Tel: +44 (0)20 7437 8656  
Direct: +44 (0)20 7440 3302  
Email: [president@rsc.org](mailto:president@rsc.org)  
[www.rsc.org](http://www.rsc.org)

**To: House of Lords EU Energy & Environment Sub-Committee**

17<sup>th</sup> August 2018

**Re: The Future of Chemical Management and Regulation Post EU Exit**

I am writing to share our ideas and perspectives on the government's intention to seek 'associate membership' of the European Chemicals Agency (ECHA) and as highlighted in the EU exit white paper, to seek a 'common rulebook'

as that lead to great advances in science.

We have a professional member community who are actively engaged in science that underpins chemicals regulation. This includes the generation of chemical sciences data, reviewing and interpreting data and providing expert input into scientific committees in order to give the best possible advice on the impacts of chemicals on health and the environment. In this way, our community supports an effective means of enabling global innovation and trade, whilst providing appropriate and consistent safeguards for human health and the environment.

**Scientists and good science are at the heart of chemicals regulation**, and play a key role in the context of informing decision making on the safety of chemicals. As the UK exits the EU, our community believes it is essential that there is a smooth and seamless transition in ensuring effective chemicals regulation. As part of the deep and special partnership the UK government is seeking with the EU, we are keen to see the UK Government ensure a suitable partnership is in place on chemicals regulation that ensures a seamless transition from 30<sup>th</sup> March 2019.

We understand from the government's white paper dated July 2018, on 'The future relationship between the United Kingdom and the European Union' that the government are seeking to negotiate new institutional arrangements. This could take the form of an 'association agreement' with EU agencies, such as the European Chemicals Agency (ECHA). This is to ensure effective regulatory cooperation and the development of a 'common rulebook' for goods, which will include chemicals. To achieve an effective agreement on chemicals in a new partnership, it is our view that some key and fundamental heads of terms, relevant to 'associate membership' of ECHA, must be negotiated and agreed with the EU by 29 March 2019, as part of the agreement on EU withdrawal and future partnership. If these are not agreed, there is the risk of interrupted collaboration and the rulebook will start to diverge immediately.

Our community is very concerned there could be an unnecessary hiatus in collaboration, data sharing and scientific engagement from 30 March 2019, as EU law dictates (as stated on the ECHA website) that the UK as a 'third country' will no longer be able to participate in data sharing functions or on ECHA's committees

---

This communication (including any attachments) is intended for the use of the addressee only and may contain confidential, privileged or copyright material. It may not be relied upon or disclosed to any other person without the consent of the Royal Society of Chemistry (RSC). If you have received it in error, please contact us immediately. Any advice given by the RSC has been carefully formulated but is necessarily based on the information available, and the RSC cannot be held responsible for accuracy or completeness. In this respect, the RSC owes no duty of care and shall not be liable for any resulting damage or loss. The RSC acknowledges that a disclaimer cannot restrict liability at law for personal injury or death arising through a finding of negligence.

