



BREXIT and Process Safety Testing Q&As

The uncertainty caused by the BREXIT process encroaches on many areas of business in the UK but also has implications for EU countries who trade with the UK.

We've put together a short Q&A to outline the impact of BREXIT on our UK Process Safety testing services to help navigate our customers through the process with minimal disruption.

- **Does BREXIT impact the acceptability of REACH data generated in a UK laboratory?**
 - From its original inception, under EU REACH, the entity registering a product must have a presence in the EU or appoint an EU based "Only Representative". This can be done either by the company managing their registration themselves, provided they are based in the EU/EEA, or by using a third-party EU based organisation, like DEKRA Assurance Services in Hanover (appointed as Only Representative). Test data, however, can be conducted anywhere provided it is of good quality. ECHA's main stipulation is that for Toxicological studies the testing is conducted to GLP. Whilst it's not mandatory for Phys/Chem testing to be performed to GLP most companies we've dealt with still requested it for robustness. Therefore, if you had Phys/Chem test data from a lab in the US, for example, you could use that data in your submission. This has always been the case and nothing's changed. What would change, if/when the UK leaves the EU, is that we (DEKRA Process Safety UK) would no longer be able to act as an Only Representative – however, our colleagues at DEKRA Assurance Services in Hanover, Germany can perform this role. In summary, testing can be performed in EU and non-EU countries provided that it's to GLP if it involves toxicology testing.

- **Does BREXIT impact the acceptability of UK generated laboratory data for ATEX sites in the EU?**
 - No – tests results for use in ATEX assessments can be performed in any competent laboratory. The DEKRA UK labs retain their internationally accepted quality (ISO 9001 and GLP) and safety management (ISO 45001) accreditations and perform tests to a wide range of international standard methods including IEC, ASTM and EN. All tests will remain fully valid for use in any EU (or non-EU) country."

- **Does BREXIT impact the shipment of samples to the UK for testing?**

- Our laboratories have served clients from both EU & non-EU countries for over 30 years. In the majority of cases, samples imported into the UK, for destructive testing, are received into our facility quickly and easily. Transport and labelling requirements in the event of BREXIT will not change in the short-term. To ensure that samples are shipped safely and quickly we recommend:
 - **For customs purposes sample's sent for testing are clearly marked with 'Sample for destructive testing only – no commercial value'**. This is an important classification in the event of BREXIT to avoid import / export taxation if such taxes or tariffs are applied.
 - **Ensure that the sample(s) are packaged correctly & securely.** Where a sample is known, or suspected, to be considered as dangerous goods that the appropriate laws are followed to ensure it's transported safely.
 - **Use a reputable courier.** Where samples are known, or suspected, to be dangerous that they have the ability to transport them appropriately under the guidance of a qualified Dangerous Goods Safety Advisor (DGSA). There could be short term disruption via some transport modes, which makes using a reputable courier even more important to ensure prompt and reliable delivery of materials.
 - **Use door-to-door shipping.** Door to Port services should not be used.
 - **Packaging should be clearly marked with:**
 - > **Our address & quotation number** (For ease an address label is supplied with our quotation).
 - > **Sender details, including contact & emergency contact numbers.**
 - > **Appropriate handling and/or transport labels.**
- Should you require any further support our dedicated sample receipt team (email: ps-testing.uk@dekra.com) are happy to assist.

- **Does BREXIT impact the cost of testing from DEKRA laboratories in the UK?**

- The nature of the UK's exit from the EU will dictate whether tariffs will be applied to imports/ exports between the UK and EU. If there is a negotiated trade deal, it is unlikely that any pricing changes will occur. Until there is certainty on the outcome, our intention is to maintain pricing and continuity of supply to our customers in the EU. In the event of a "no-deal", the situation will be reviewed and communications with clients will happen promptly to pre-empt any changes in prices. For now, we assume "business as usual".

Would like to discuss further?

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