CDX
by DXC Technology

DXC CDX WEBINAR | Jan 14, 2026

One Product, Two Markets: Navigating UK-EU Regulatory Divergence in Product Chemical Compliance

This session will be recorded.

DXC at a glance

$12.87B
FY25 revenue

60+
years of innovation delivering mission-critical systems for customers

120,000+
employees worldwide

70+
countries

50,000
Engineers

200
customers in the Fortune 500

200+
partner ecosystem with best-of-breed partners

49,000
Partner certifications

CDX COMPLIANCE DATA EXCHANGE by DXC Technology

In Business since 2011

DXC leveraged the lessons learned while providing IMDS to create CDX

30,000+

Chemical Abstract System (CAS) substances found in common products

10,000+

Of standard metals with compositions and norms

Compliance & Privacy Certifications

- ISO 9001 Quality Management
- ISO/IEC 27001 Information Security Management
- ISO 50001 Energy Management
- SOC1 & SOC2
- TiSAX

Memberships

CDX is an active member and partner of several international associations, where we work closely with various industry players to ensure the best use of our products.

AIAG Automotive Industry Action Group

AEM Association of Equipment Manufacturers

IPC Member

Fraunhofer

IAEG INTERNATIONAL AEROSPACE ENVIRONMENTAL GROUP

11.6k+
Companies registered

40.3k+
Active users

~1MM
Material Declaration Sheets (MDSs)

50.5k+
Conflict Minerals Declarations (CMDs)

DXC

Speaker Introduction

Chuck LePard

Executive Consultant, IMDS & CDX Americas Representative

Chuck.Lepard@dxc.com

LinkedIn Profile

- **Degrees in Electrical & Computer Engineering and Computer Science**
- **Honorable Discharge, United States Navy**
- **40 Years EDS/General Motors/Hewlett Packard/HPE / EntServ / DXC**
- **Decades of plant floor and engineering experience in related areas**
- **Advisor to multiple manufacturing industry groups**
  - Automotive Industry Action Group, International Aerospace Environmental Group,
  - Association of Equipment Manufacturers, Responsible Materials Initiative
- **Leader in Standards Development organizations**
  - American National Standards Institute (ANSI), International Standards Organization (ISO) Technical Committee TC-111 on Environmental Sustainability Data Exchange
  - IPC 2-18 175x family for Product Declaration and Compliance reporting

Speaker Introduction

Will Martin

Managing Director of EPR Consulting Ltd

- **Provider of Chemical Service to DXC Technology, managing substance & regulatory updates in IMDS & CDX**
- **DXC Training partner for UK**
- **Consultant to ACEA supporting Substance Impact Assessment Process (SIAP), and GADSL processes**
- **Member of Institute of Sustainability and Environmental Professionals (ISEP)**
- **Developed software and data to support M&P compliance and risk assessments, integrated with product development for aerospace companies**

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Speaker Introduction

Monika E. Kotkowska

Senior CDX Consultant / Regulatory Product Compliance Expert

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LinkedIn profile

- **Specializes in Regulatory Product Compliance, ESG, and Chemical Management Solutions.**
- **Holds a Master of Business Administration (MBA) with a focus on ESG topics.**
- **Holds a Master's degree in Chemistry and Engineering from the University of Technology in Wroclaw, Poland.**
- **Certified Agile and PRINCE Project Manager.**
- **Over a decade of experience in diverse compliance regulatory.**
- **Actively involved in IAEG, AIAG, and more recently, AEM.**
- **Outside of work, a true travel backpacker at heart.**

Agenda

01 Regulatory Independence

Understanding the practical impact of UK divergence on global supply chains

02 Supply Chain Consequences

Operational impacts of having two independent systems on a single global supply chain

03 Northern Ireland Dual Zone

Clarify NI’s status, dual-regulatory setup, and what it means for CE/UKCA marking.

04 Emerging Requirements

Summarize upcoming or divergent requirements (PFAS, POPs, REACH/Annex XIV/XVII, RoHS)

05 Practical Compliance Strategy

Translate all of the above into a pragmatic playbook

06 System Demo

CDX platform demonstration for managing dual-market compliance

The Brexit Timeline: From Referendum to Now

June 2016

UK votes to leave EU.
51.89% for Leave.

January-December 2020

Transition period. UK still in EU regulatory space, but HSE building independent systems behind the scenes.

January 1, 2021

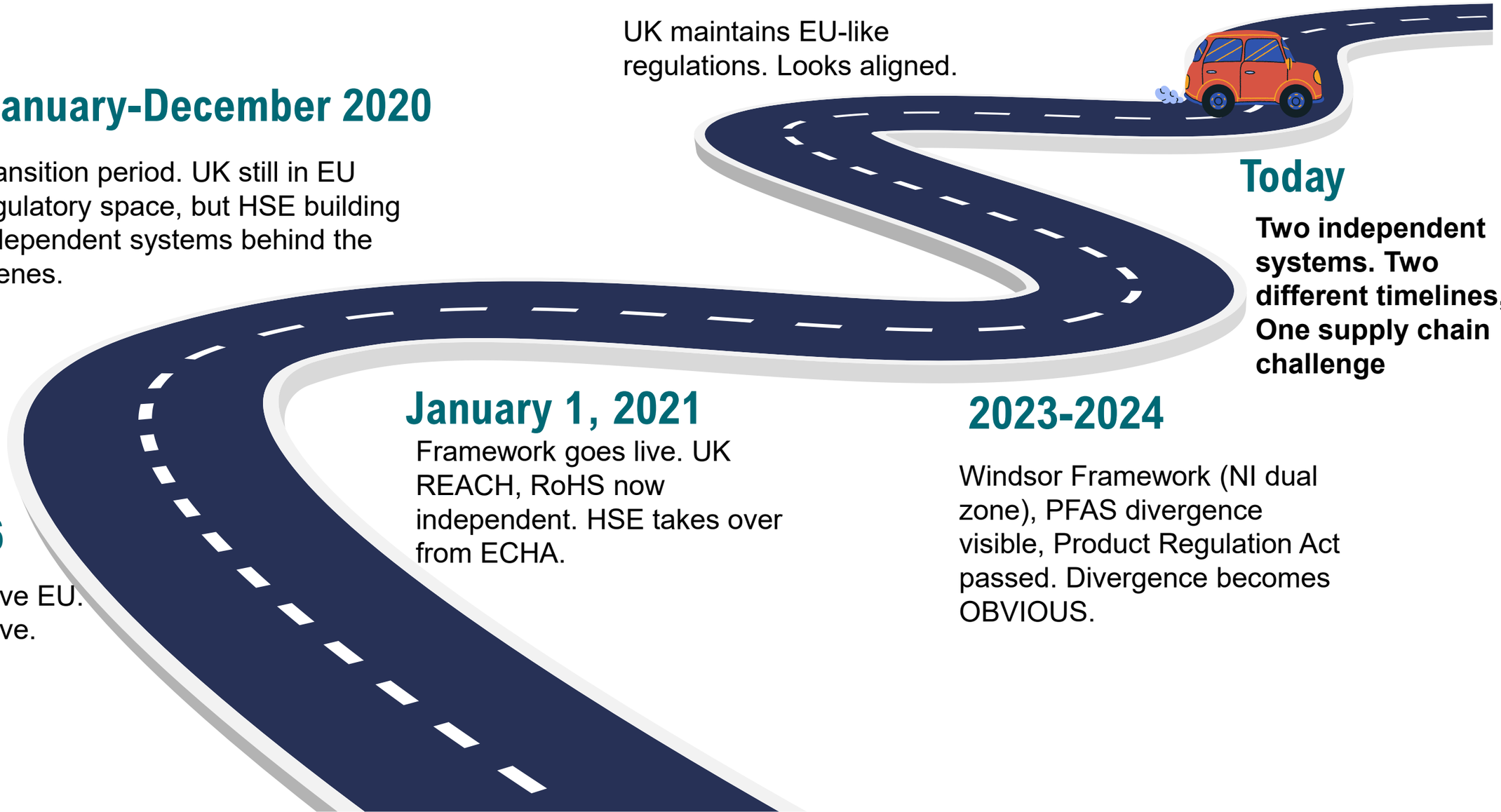
Framework goes live. UK REACH, RoHS now independent. HSE takes over from ECHA.

2021-2023

UK maintains EU-like regulations. Looks aligned.

2023-2024

Windsor Framework (NI dual zone), PFAS divergence visible, Product Regulation Act passed. Divergence becomes OBVIOUS.



Today

Two independent systems. Two different timelines, One supply chain challenge

What This Divergence Actually Means: Supply Chain Consequences

REGULATORY LANDSCAPE

- Post-Brexit UK operates its **own regulatory framework**, no longer aligned with EU
- **Timeline divergence**: UK implementing changes on different schedules than EU

OPERATIONAL IMPACT

- Different authorized representatives needed
- Separate product databases for each market
- Different notification procedures per market
- Rolling compliance deadlines

COST IMPLICATIONS

- Separate testing: £5,000-£25,000+ per product category
- Dual documentation: 15-30% overhead
- Supply chain restructuring costs

Where Compliance Paths Diverge: Critical Differences

These aren't just administrative differences - they represent real operational splits that affect every stage of your compliance journey.

APPROVAL MARKING	EU	UK	BUSINESS IMPLICATION
Marking System	CE mark	UKCA mark (CE temp. extended)	Different marking, dual documentation, retailer confusion
Registration Portal	ECHA database	UK HSE portal	Separate systems, different deadlines, manual process
Market Access	EU-27 + EEA	GB only (NI dual)	Product that’s compliant for one market isn't for other
Representative Required	EU-based Only Rep	UK-based economic operator	Multiple contracts, multi-jurisdiction liability

No mutual recognition. Compliance for one market does NOT satisfy the other.

This is not a transition. This is permanent.

Navigating from CE to UKCA Marking

2020-2021

Before Brexit: CE marking

Post-Brexit Transition:

During the transition period, the UK allowed the continued use of CE marking to facilitate the shift towards UK-specific regulations.

Introduction of UKCA Marking:

The UK introduced a new standard, the UK Conformity Assessed (UKCA) marking, for goods placed on the market in Great Britain (England, Scotland, and Wales), signaling a departure from CE marking.

Deadline to move into UKCA till 31 December 2022.

2022

UKCA Marking Requirement Extended

UK Government allows the use of CE marking until 31 December 2024.

Supports businesses during economic and pandemic challenges.

2024

CE Recognition Extended Indefinitely for 21 Regulations

The UK Government extended CE mark recognition indefinitely for 21 regulations (original 18). This legislation came into force on 1 October 2024.

The 21 regulations now include the original DBT regulations plus 3 additional regulations covering:

- Ecodesign requirements
- Civil explosives
- Restriction of hazardous substances (RoHS)

Manufacturers can use either CE or UKCA marking for these 21 products going forward, providing ongoing flexibility.

2025 Beyond

Additional CE Recognition

- **Construction Products** Exception: CE marking recognized until 30 June 2025; UKCA mandatory from 1 July 2025.
- **Medical Device** (30 June 2028
- **In-Vitro Diagnostics (IVD**) (30 June 2030)

Northern Ireland: Dual Regulatory Zone

What Makes Northern Ireland Different?

Northern Ireland is unique. It's **part of UK customs territory** but **applies EU regulations** for goods.

This creates a deliberate **dual compliance requirement.**

What NI is:

- ✓ Part of UK for customs
- χ Follows EU regulations for product compliance (REACH, RoHS, etc.)
- ✓ Maintains open border with Ireland = DUAL COMPLIANCE ZONEs

Why this Matters for Your supply chain:

For NI-based manufacturers exporting:

→ **To GB |** UK compliance **(UKCA marking)**

→ **To EU |** EU compliance **(CE marking)**

→ **To both** | Dual compliance **(CE + UKCA)**

Dual documentation + potential customs procedures

NI Dual Zone: Practical Implications

Strategy Options for Manufacturers

1 EU Compliance Only (Simplest)

Simplest approach - ensure all products meet EU standards, allowing sale in NI, EU, and GB (GB accepts EU compliance temporarily)

2 Dual Marking (Most Flexible)

Products carrying both CE and UKCA marks for maximum flexibility - requires comprehensive dual compliance documentation (dual testing/certification)

3 Market Segmentation (Complex)

Separate product lines: EU-compliant for NI/EU, UK-compliant for GB only - increases complexity but may reduce costs long-term

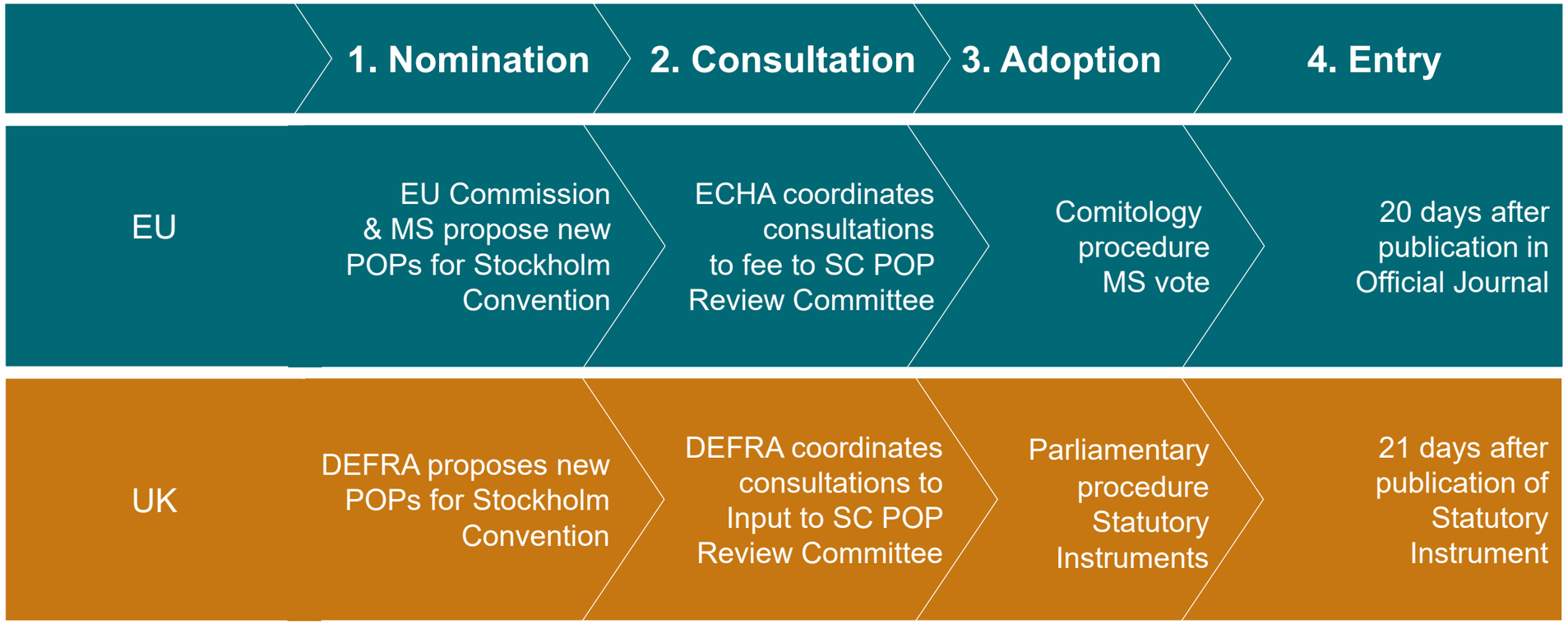
POPs Regulation: EU vs UK Framework

Both signatories to Stockholm Convention, but regulatory timelines and scope diverge

Aspect	EU POP	UK POP
Process Context	Implements restrictions and bans on the use and placing on the market of POPs identified by the Stockholm Convention	
Regulatory Lead	European Chemicals Agency (ECHA) in coordination with European Commission	Department for Environment, Food and Rural Affairs (Defra) as primary regulator
Supporting Bodies	Member State competent authorities	Environment Agency (EA). Natural Resources Wales (NRW). The Scottish Environment Protection Agency (SEPA).
Total Substances	~34 Entries (as of Jan 2026)	~32* (as of Jan 2026)
Business Impact	• *Dechlorane plus and UV-238 were included in UK POP ahead of EU, then temporarily removed following new information from medical sector • EU and UK operate independent processes to transpose Stockholm Convention into national regulation - important to engage in regulatory process in both territories if you have POPs in your product and operate in both markets	

How POPs Are Added: EU vs UK Timeline

Regulatory Lead in EU is European Commission where in UK Defra (Department for Environment, Food & Rural Affairs)



Business Impact
6-12 months regulatory divergence window
Requires dual compliance strategy

REACH Deep Dive: EU and UK Perspective

Aspect	EU REACH Framework	UK REACH Framework
Regulatory Body	European Chemicals Agency (ECHA)	UK Health & Safety Executive (HSE)
Scope	Chemicals, substances, mixtures, articles	Chemicals, mixtures, articles for GB market (NI follows EU)
Registration Requirements	Companies must register chemicals >1 ton/year with ECHA	New registration at UK HSE portal; EU Registrations ‘grandfathered’ until transition
SVHC Identification	Candidate List published by ECHA	Candidate List published by HSE
Authorization Process	Annex XIV substances require ECHA authorization	UK HSE reviews Annex XIV authorization; process similar to EU
Annex XVII	Specific restrictions on use/import/sale, regularly updated	UK maintains its own list; regulatory updates may lag EU
Timeline/Deadlines	Immediate for new substances; existing phased deadlines	Transitional deadlines planned for further extension (27 October 2029, 27 October 2030, 27 October 2031)
SCIP	SCIP database required	No SCIP

Substance Restriction Divergence: SVHC

	EU SVHC CANDIDATE LIST	UK SVHC CANDIDATE LIST
Total number of substances (as of Jan 2026)	251	209
Decision body	ECHA RAC/SEAC	UK HSE independently
Update frequency	2-3 x / year	Not updated since transition period
The UK Candidate List has not been updated since the 2020 transition period. Government is consulting with industry on approach to add additional substances. Likely to be either the same, or a subset.		

Having separate EU and UK Candidate Lists adds regulatory burden. Government is seeking to address this by consulting with industry on best approach – add all EU CL substances, or subset. No plans to include non EU CL substances.

Substance Restriction Divergence: Authorisation List

	EU Authorisation List	UK Authorisation List
Total number of substances (as of Jan 2026)	59	54
Decision body	ECHA RAC/SEAC	UK HSE independently
Update frequency	1 x / 2 year (average); 55 – 59 included Apr 2022	Not updated since transition period (Entries 44-54 included Feb 2020);
Authorisations in place prior to transition period remain valid in UK. Draft recommendation from HSE to include entries 55, 58, 59 published Nov 25. GB specific information requested on entries 56, 57		

UK Authorisation List lagging behind EU Authorisation List, but includes same or subset of substances. Important to engage in UK Authorisation process if you have these substance in GB product to avoid potential supply disruption.

Substance Restriction Divergence: ANNEX XVII

Aspect	EU ANNEX XVII	UK ANNEX XVII
Currently number of substances	82 Entries	74 Entries
Enforcement	Commission + MS	UK HSE, Environmental Agencies, Local authorities
Recent Change	PFAS proposal	Lower, more selective
The UK REACH Annex XVII List has not been updated since the 2020 transition period (Entry 74 diisocyanates). UK Registry of restriction intentions includes Entry 75 tattooing inks; Entry 63 amendment on lead in ammunition (entered into force February 2023 in EU; Entry 82 PFAS in firefighting foams)		

EU Annex XVII ≠ UK Annex XVII shows UK lagging behind EU restrictions, and launching consultations on a subset, rather than all restrictions. Important to engage in UK process if your products contain substances in scope as restriction outcome will be market specific.

RoHS Divergence: What's Changing (and What Might)

MARKING REQUIREMENTS
(Most Immediate Impact)

Timeline:

- 2022: UKCA marking introduced, required by Dec 31, 2022
- 2024: Extension: CE marking STILL accepted in GB
- 2024+: Future – CE & UKCA likely to valid onging

EXEMPTION DIVERGENCE

46 Annex III exemptions (EU) vs ~45 exemptions (UK);
49 Annex IV exemptions (EU) vs ~47 exemptions (UK);

Divergence Risk Examples:
Exemption 4(b)-I expired 24 Feb 23 in EU, 24 Feb 24 in UK
UK generally follows EU, but process is independent and exemption details can differ.

- Same component, different compliance status by market
- Exemption application process separate & independent

ENFORCEMENT

Different enforcement:

- EU - individual Member States' Authorities
- UK - Office for Product Safety and Standards (OPSS) on behalf of DEFRA

Geological scope

- European Union (EU) & EEA* (inc. NI**)
- England, Scotland, and Wales (GB)

“Forever chemicals”

Overview of Per- and Polyfluoroalkyl Substances (PFAS)

Extensive Family of Chemicals: PFAS are a large family of more than 10,000 synthetic chemicals with at least one fully fluorinated methyl or methylene carbon atom (OECD)

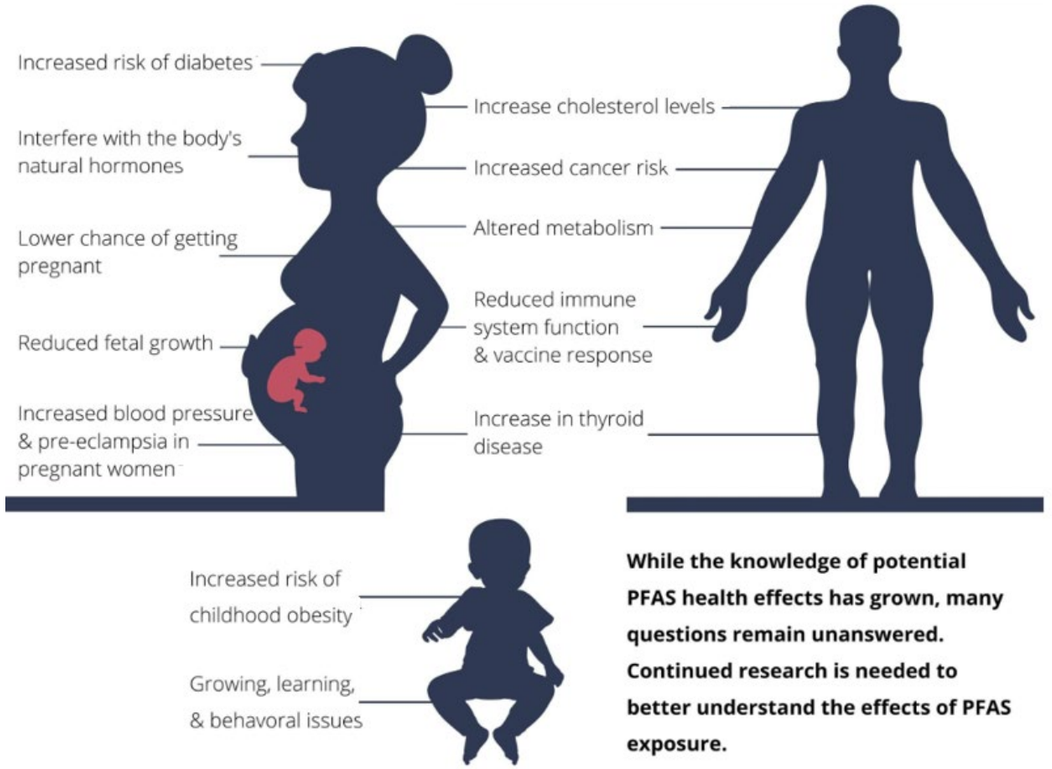
Regulatory Challenges: Different regulatory bodies and scientific organizations may adopt varying criteria for what constitutes a PFAS, leading to inconsistencies in definitions

Properties:

- Highly persistent – non-degradable in environment
- Bioaccumulative – accumulate in wildlife & humans
- Long half-life – 8+ years in human body
- Health concerns –documented risks

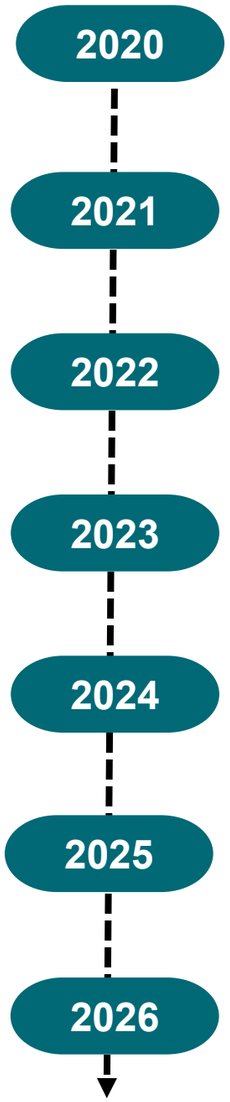
Applications (examples):

- Lubricants, Electronics, Corrosion inhibitor, Tyres, Coating
- Firefighting foams (AFFF), packaging, non-stick cookware
- Cosmetics, personal care, waterproof sprays and textile …



Source: https://www.wehnonline.org/pfas

PFAS Regulatory Landscape in UK



CL & Annex XIV Last updated June 2020

EU REACH CL

UK REACH CL

No additions since end of Transition period (Entry 74)

EU Annex XVII

UK Annex XVII

25-26 Workplan to review to make 3rd recommendation for Annex XIV by end of 2025

Registry of Intentions PFAS in Firefighting Foam Restriction consultation launched Aug 25 – Feb 26

PFHxS added Nov 2023

EU POP

UK POP

- Based on 2014 EU Regulation
- Consultation December 23 – Feb 24 to feed into development of regulation
- Likely to align with new EU-F-Gas regulation with similar requirements

EU F-Gas

UK F-Gas

Policy paper on PMT approach published June 25 to support framework for broader PFAS Restriction.
July 25 Policy Paper on UK REACH work program seeks ‘to draw more from regulatory decision-making in other jurisdictions’ and ‘is more aligned with our closest trading partners’

Digital Product Passports: EU Mandatory vs UK Uncertain

EU: Rolling mandatory sectoral DPPs.
UK: No mandate; alignment uncertain;
NI fully aligned with EU.

Assessment Done:

- BSI published draft DPP standards (July 2025)
- OPSS is coordinating UK regulatory approach through industry consultation

Current Stage:

- UK is in standards development and stakeholder engagement phase (2025)

Status: UK is preparing but not yet legislating DPP requirements

Practical Compliance Strategies for Global Supply Chain

A single-entry, multi-regulatory compliance system can cut preparation effort and ongoing compliance costs by around 30–40% by eliminating duplicate data entry and fragmented processes.

Best Practices

- Run EU and UK as separate legal regimes, but on one global compliance data model and workflow to avoid duplicated data and manual rework.
- Monitor EU (ECHA/EC) and UK (HSE/OPSS) updates and map them into a single global requirements library.
- Track exemptions and approvals for all jurisdictions in one system to avoid missed renewals.
- Budget for set of digital test evidence and technical documentation that can be reused to meet multiple regulatory regimes instead of re-testing per region
- Engage proactively with authorities and standards bodies, leveraging digital submissions and single-window trade systems to reduce clearance time and admin costs.

Coming Soon

Stay ahead of regulatory and compliance developments with CDX.

Webinar Topics:

- **Understanding Extended Minerals: Meeting Due Diligence Requirements under Battery Regulations**
- **Battery Regulation and Digital Battery Passport**

Newsletter:

- Regulatory Updates Q1/2026

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