

Only representatives: How to ensure that your account represents only one non-EU manufacturer

August 2022

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Disclaimer

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Version	Changes	
1.0	First edition	April 2022
1.1	Second edition Editorial changes to section 2 to make the text more readable and to clarify that non-EU manufacturers can continue appointing separate only representatives for different substances, and 3.2 to make the text more understandable.	August 2022

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If you have questions or comments in relation to this document, please send them (quote the reference and issue date) using the information request form. The information request form can be accessed via the Contact ECHA page at:

<http://echa.europa.eu/contact>

European Chemicals Agency

Mailing address: P.O. Box 400, FI-00121 Helsinki, Finland

Visiting address: Telakkakatu 6, Helsinki, Finland

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1. Introduction: only representatives according to REACH

Substances imported into the EU on their own, in mixtures or, under certain conditions, in articles need to be registered by their EU importers. This implies that each individual importer needs to register the substance(s) they import. However, under REACH, **a natural or legal person established outside the EU, who manufactures a substance, formulates a mixture or produces an article¹ can appoint an only representative** to carry out the registration of the substance that is imported (as such, in a mixture or in an article) into the EU (Article 8(1)). This will relieve the EU importers importing from this non-EU manufacturer and whose tonnage is covered by this registration from their registration obligations, as they will be regarded as downstream users. 'Non-EU distributors'² are not mentioned in Article 8(1) and therefore cannot appoint an only representative.

An only representative must be a natural or legal entity officially established in the EU according to national legislation and must have an EU official address where they can be contacted by the enforcement authorities. Most EU Member States require that the official address of the only representative is in the EU Member State where they are established. An only representative should have sufficient background in the practical handling of substances and the information related to them to be able to fulfil the obligations of importers.

If several companies established outside the EU export substances into the EU, each company constitutes a separate non-EU manufacturer under REACH, even if each of the companies is part of the same group. Each non-EU manufacturer must appoint an only representative. A non-EU manufacturer can only appoint one only representative.

If a non-EU manufacturer decides to change their only representative, the only representative must notify this to ECHA through the REACH-IT functionality 'Legal entity change'. A change of only representative constitutes a change of legal personality. Changes in the identity of the non-EU manufacturer involving a change in their legal personality should be notified as well. For more detailed information see the ECHA practical guide *How to report changes in identity under REACH and CLP* available at: <https://echa.europa.eu/practical-guides> and the ECHA Guidance on registration available at: <https://echa.europa.eu/guidance-documents/guidance-on-reach>.

The roles of only representatives and importers are not interchangeable. The role of an only representative is substantially different from that of an importer. While the registration of an only representative can cover multiple importers in the EU, it only covers imports from the one non-EU manufacturer that has appointed the only representative. In contrast, an importer does not represent another legal entity but acts on their own behalf. An importer is physically introducing the substance into the EU customs territory and placing it on the market, and their registration covers all quantities of the substance imported in the EU, regardless of the non-EU source. An importer can also be at the same time a manufacturer of the substance. This is not the case for the only representatives.

¹ For the ease of reference, the non-EU entities that are listed in Article 8(1) will be referred to in this document as non-EU manufacturer, even though they may be formulator of a mixture or producer of an article.

² A 'non-EU distributor' is **not** a distributor for the purposes of REACH as they are not a natural or legal person established in the EU (as defined in Article 3(14)). An EU-based distributor cannot, of course, appoint an only representative.

2. Only representatives in REACH-IT

[Commission Regulation \(EU\) 2022/477 of 24 March 2022 amending Annexes VI to X of REACH](#) foresees that – from 14 October 2022 – only representatives must provide the name and contact details of the non-EU manufacturer they are representing. Only representatives will provide this information in REACH-IT.

If an only representative acts on behalf of several non-EU manufacturers, the only representative must have a REACH-IT account for each of these manufacturers – insofar as the non-EU manufacturers are different legal entities. This is also the case if the non-EU manufacturers are part of the same group. The only representative must submit the necessary registrations for each of non-EU manufacturers from the correct REACH-IT account. **One REACH-IT account can contain registrations from only one non-EU manufacturer.**

If wanted, non-EU manufacturers can continue appointing separate only representatives for different substances. However, in this case also, each only representative must have a separate REACH-IT account for each non-EU manufacturer they represent.

An only representative cannot declare to also be a manufacturer or importer in the same REACH-IT account, as these are incompatible roles. If an only representative also manufactures or imports substances, they must have a separate REACH-IT account covering their manufacturing/importing activities, and submit the necessary registrations from this REACH-IT account.

The following roles within the same REACH-IT account are incompatible:

- only representative and importer;
- only representative and manufacturer;
- only representative and manufacturer/importer.

The only representative must declare the **company size** of the non-EU manufacturer that they represent. The size of the non-EU manufacturer will determine the registration fee which is paid to ECHA.

3. Before the declaration: reorganise your REACH-IT account if necessary by 14 October 2022

In preparation for the obligation to identify the non-EU manufacturer, you must make sure that:

- You act as an only representative of only one non-EU manufacturer in your REACH-IT account.
- You are representing a non-EU manufacturer from one REACH-IT account only.
- Your REACH-IT account does not contain registrations as an only representative and as a manufacturer/importer.

3.1 You are representing more than one non-EU manufacturer in one REACH-IT account

If you are acting as an only representative and you realise that from your REACH-IT account you represent several non-EU manufacturers you must fix the situation. You must have a separate REACH-IT account for each of the non-EU manufacturers you represent. To fix the situation you need to transfer registrations to the correct REACH-IT accounts.

3.2 You are representing the same non-EU manufacturer from several REACH-IT accounts

If you are an only representative and you represent the same non-EU manufacturer from several REACH-IT accounts, you should merge these accounts into one. You should represent a non-EU manufacturer from just one REACH-IT account.

3.3 You have registrations as a non-EU manufacturer and as a manufacturer/importer in one REACH-IT account

If from the same REACH-IT account you registered substances for which you declared incompatible roles in the supply chain (i.e. you indicated that you were an only representative for some registrations and a manufacturer/importer for others) you must fix the situation.

From early May 2022, in the 'Reports' section of the REACH-IT menu, you can find the 'Registration report' page. From there, you are able to download the list of all of your registrations. That list provides you with information on the 'role in the supply chain' that you indicated for each of your registrations. On accounts with registrations as only representative, you must not have registrations where you indicated that you are the manufacturer/importer. If you are using the account as a manufacturer/importer, then you must not have registrations where you are acting as the only representative.

To solve those cases where your account has registrations with incompatible roles you can either:

- transfer the affected registrations to the correct REACH-IT accounts or
- update the registration, if you indicated the incorrect role in the supply chain in the IUCLID 6 dossier.

4. Transferring your registrations by 14 October 2022

If you need to solve the scenarios described above, from 26 April 2022 you can use the legal entity change functionality available in REACH-IT to transfer your registrations to the correct account. This transfer of registrations is not a legal entity change as defined in Article 22(1)(a) of REACH, since the legal entity owning the registrations remains the same.

For this specific purpose and to facilitate the alignment of your accounts to the requirements, the legal entity change fees **will be waived until the entry into force** of the review of Annex VI of REACH on **14 October 2022**. After this date the legal entity change fees will not be waived anymore.

You can follow this approach for transferring your registrations successfully:

1. **Determine your strategy.** Decide what you will do with your registrations. You might

need to create additional accounts in REACH-IT for all the non-EU manufacturers you represent. You should consider any other potential asset that you might have in your account (e.g. PPORDs, inquiries, C&L notifications, DU notifications).

The REACH-IT account from which you start the transfer is called the 'initiator account'. The account that you will transfer to is called the 'successor account'.

Attention

If you transfer a registration or a C&L notification to an account that already has a registration or a C&L notification for the same substance, the newly transferred asset will be annulled.

For cases, where a registration is transferred to the successor who has a C&L notification for the same substance, the C&L notification will be annulled.

Annulled registrations and C&L notifications in REACH-IT cannot be reinstated.

If you need to transfer registrations or notifications, determine how many and which successor accounts you will need. From the initiator account you can start several legal entity changes at the same time.

To avoid the annulment of your registrations and C&L notifications, you must plan the order of the transfers carefully. This is particularly important if you need to transfer several registrations or C&L notifications to multiple accounts. To avoid annulment, before initiating the legal entity change transfers in REACH-IT, cross check if there are registrations and C&L notifications that are in the initiator account and in the successor account.

2. Set up **the successor account in REACH-IT** and take note of its legal entity UUID.
Enter the company size information: only representatives need to indicate for each account the company size of the non-EU manufacturer they are representing.
3. Registrations with pending submissions, such as submissions undergoing completeness check, cannot be transferred. If you want to be able to transfer your registrations, you must make sure that none of the submissions are pending.
4. Prepare the declaration of reorganising your account in REACH-IT, that you will need to upload as supporting document when using the legal entity change functionality.
5. Initiate the transfer in REACH-IT, using the legal entity change functionality. Follow the practical instructions described in section 6 Practical instructions for transferring your registrations in REACH-IT.
6. From the successor account, you will need to confirm if you accept to receive the assets being transferred.

Before you proceed with the confirmation, the '**Annulment calculator**' will warn you if the successor account has registrations or C&L notifications for the same substance, that will be annulled if you proceed with the transfer. In that case, to prevent the annulment you can 'Request modifications from the initiator'. You will receive a

message in your initiator account and you will be able to either delete the transfer or edit the list of assets to be transferred.

Attention

To avoid the annulment of registrations and C&L notifications, do not accept a transfer until a previous one is completed, and the transferred assets are in your account.

ECHA recommends that from one REACH-IT account you are not an initiator and a successor at the same time.

During the transfer, as a successor, you will need to review the contact person assigned to each registration and notification, so ECHA can contact you if necessary.

7. If the transfer includes registrations, REACH-IT will automatically send an invoice. If the transfer of registrations is to fix the situations described in section **Error! Reference source not found.**, contact ECHA at <https://echa.europa.eu/contact> explaining the situation and requesting to waive the invoice(s). The legal entity change fee will be waived by ECHA and the transfer(s) will be completed.

When you contact ECHA, include multiple transfers in the same message when possible. ECHA **will waive the invoices until** the entry into force of the review of Annex VI of REACH on **14 October 2022**. After this date no more requests of waiving the fee will be accepted and the legal entity change fee will have to be paid for each transfer. ECHA will reply to your request once the fee is waived, mentioning the nature of this transfer. This will serve as a proof for your own administrative purposes.

Transfers that do not include registrations do not create an invoice and the transfer will complete successfully in REACH-IT soon after the transfer is accepted by the successor.

You remain responsible for complying with any decisions addressed to you, also after transferring the registration to another REACH-IT account.

With the transfer of a registration, any potential role within the joint submission is also transferred. Therefore, in case of a transfer of a lead registration, you will keep the lead registrant role within the joint submission, while in case of a member registration, you will remain a member of the joint submission.

If you are acting as an only representative, then you will need to indicate in REACH-IT the name and contact details of the non-EU manufacturer.

5. Cancelling your transfer

If you want to cancel the transfer **before** it has been accepted from the successor account:

- From the successor account select 'Request modifications from the initiator', (see section 6 of the practical instructions below).

- When you receive the request in the initiator account choose to 'delete' the transfer. This will cancel the transfer and restore all the registrations and notifications in the initiator account.

If you want to cancel the transfer **after** it has been accepted from the successor account and the invoice was issued:

- In this case the successor can only choose not to pay the issued invoice. After the extended due date of the invoice has passed, the transfer will be cancelled and all assets will return to the initiator account.

6. Practical instructions for transferring your registrations in REACH-IT

The following step-by-step instructions explain how to use the wizard of the legal entity change functionality in REACH-IT to transfer REACH registrations and notifications in order to fix your REACH-IT account.

Still have questions? Read the new [manual on legal entity change](#) or contact ECHA through the [contact forms](#).

Legal entity change (LEC): Initiator account steps

<p>Practical Tip Before initiating</p>	<p>Legal entity change details</p> <p>Step 1 LEC status: n/a</p>	<p>Legal entity change type</p> <p>Step 2 Status: 'draft'</p>	<p>Attachments</p> <p>Step 3 Status: 'draft'</p>	<p>Confirmation</p> <p>Step 4 Status: 'draft'</p> <p>Step 5 Status: 'draft'</p>		<p>Transfer has been sent to the successor</p> <p>Status: 'created'</p>
<p>Clean up old legal entity changes in the account</p>	<ol style="list-style-type: none"> 1. Name your legal entity change 2. Select or create a contact person 3. Indicate the company UUID of the successor 4. Continue to legal entity change type 	<ol style="list-style-type: none"> 1. Select the type of legal entity 'Only representative changes' 2. Choose how to select the assets 3. Select the asset(s) 	<ol style="list-style-type: none"> 1. Click on add the supporting document 2. Name the document 3. Search the document in your system 4. Confirm upload 5. Continue to confirmation 	<p>Review the asset list and the provided information</p>	<p>Confirm the transfer</p>	<ol style="list-style-type: none"> 1. Receive a token from REACH-IT 2. Provide the name and token of the legal change to the successor outside REACH-IT

Legal entity change: Initiator account steps

1. Click on the Menu icon.

2. Click on 'Search or finalise a legal entity change' under the 'Legal entity change' section.

- Manage company
 - Company information
 - Company size
 - Contacts
 - Email notification settings
 - Legal entity change
 - Initiate a legal entity change
 - Search or finalise a legal entity change
 - Create and export an assets list

Before you start the legal entity change, search if your REACH-IT account has old legal entity changes that have not been finalised.

1. Go to REACH-IT Menu >
2. Search or finalise a legal entity change
3. In the legal entity change status, select: 'Draft'
4. Click on Search

REACH-IT

Tasks Substances Messages Quick search by number

Menu Home Advanced search

I am looking for: Legal entity changes


Locate Filters

Legal entity change name:	Please enter a minimum of three characters	Legal entity change status:	Draft x
Reference number:	Please enter a minimum of three characters	Legal entity change type:	You may select multiple items

4 Search Clear

Legal entity change: Initiator account steps


☰ Results 1 results found Download results

Legal entity change name	Role in Legal entity change	Legal entity change status	Legal entity change date
Transfer 1	Initiator	Draft	

Page 1 of 1 Items / Page: 25

5

Delete Edit

 Home

☰ Menu

- Manage company
 - Company information
 - Company size
 - Contacts
 - Email notification settings
 - Legal entity change
 - Initiate a legal entity change**
 - Search or finalise a legal entity change
 - Create and export an assets list

6

We recommend you delete any 'Draft' transfer(s) before you start a new LEC.

5. You can select the draft and click on Delete

6. Begin a new transfer by going to **REACH-IT Menu > Initiate a legal entity change.**

Legal entity change: Initiator account steps

Step 1
LEC status: n/a

1. Name your legal entity change
2. Select or create a contact person.
3. Indicate the UUID of the successor.
4. Continue to legal entity change type

The screenshot shows a web form for a legal entity change. It includes the following fields and elements:

- Field 1:** "Legal entity change name: *" with the value "transfer from company X to OR Y".
- Field 2:** "Contact person: *" with a contact card showing a person icon, email "@echa.europa.eu", and phone "+358...". An "Assign contact" button is to the right.
- Field 3:** "Legal successor UUID: *" with the placeholder text "Place your the UUID provided by the successor here".
- Originating legal entity information:** Two lines of text: "Originating legal entity UUID: Your legal entity's account UUID is automatically displayed here" and "Originating legal entity name: Your legal entity name is automatically displayed here".

4 Continue to legal entity change type >

- This field does not define the successor, it is only used to give a name to this transfer.
- The company UUID only becomes valid after the REACH-IT terms and conditions have been accepted. If the successor account has provided a UUID and has not accepted the REACH-IT terms and conditions, the system will prompt the error: 'The UUID is not valid'.
- A successor cannot be selected if they are the initiator of another pending legal entity change.
- If the hyperlink for the next page does not show then click on any part of the webpage and the link to the next page should appear.

Legal entity change: Initiator account steps



ECHA will exceptionally allow to use the 'Legal entity change' functionality in REACH-IT to address new scenarios to fix the registrant's account.

The '**legal entity change type**' is used to select assets in the following way:

- **Merger** – selects all assets in the account automatically in one step, to transfer all assets in the account.
- **Split** – allows for individual asset selection, keeping unselected assets in the account.
- **Only Representatives** - have to choose the 'Only representative changes' transfer option. Choose either 'select all' or use the '+' sign to select assets individually.

Step 2
Status: 'draft'

1. Select the type of legal entity
2. Choose how to select the assets:
 - Manual selection

1 Please select the type of legal entity change

- Merger
- Split
- Only representative changes

2 How do you wish to define the assets to be transferred?

- Manual selection of assets in REACH-IT
- Upload of file with identified assets

Legal entity change: Initiator account steps

Step 2

Status: 'draft'


3. Find your assets:
Search for the
assets

Or

4. Click and select
each asset
individually
5. Continue to
attachments

3

a Find assets

🔍 Locate 

Reference number:


Substance identity (EC, CAS, name):



Filters


Asset type:

Submission date: from: to:

Search Clear

b Select assets: You may select assets individually by clicking on  or Select all

Reference number	Asset type	Substance
01- <input type="text"/>	Registration	EC: 200-817-4 CAS: 74 chloromethane 
01- <input type="text"/>	Registration	EC: 214-302-7 CAS: 1120-2... decyldimethylamine 

c Selected assets: You may remove assets individually by clicking on  or Deselect all

Selected assets from Section **b** will be placed here, in section **c**

5

Continue to attachments 

Legal entity change: Initiator account steps

Step 3
Status: 'draft'

1. Add the supporting document (Letter explaining that this functionality is to be used to arrange your REACH-IT accounts and should not be considered as an actual legal entity change)
2. Name the document
3. Search the document in your system
4. Confirm upload
5. Continue to confirmation


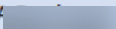
The screenshot shows the 'Initiate legal entity change' page. At the top, there is a navigation bar with 'Menu' and 'Home' buttons. Below this, there are four progress indicators: 'Legal entity change details' (green), 'Legal entity change type' (green), 'Attachments' (white), and 'Confirmation' (blue). The 'Attachments' indicator is highlighted with a white circle. Below the progress indicators, there is a section titled 'Supporting documents' with a question mark icon. This section contains a table with columns 'Document title', 'Attachment', and 'Comment'. The table is currently empty, with the text 'No attachments found' centered below the columns. At the bottom right of the table, there is a yellow button labeled 'Add supporting document' with a red circle containing the number '1' next to it.

The screenshot shows the 'Add supporting document' form. It has a blue header with the title 'Add supporting document'. The form contains three input fields: 'Document title: *' with a placeholder 'Please enter a minimum of three characters', 'Comment:' with a placeholder 'Please enter a minimum of three characters', and 'Document: *' with a 'Browse...' button. A red circle with the number '2' is next to the 'Document title' field, a red circle with the number '3' is next to the 'Browse...' button, and a red circle with the number '4' is next to the 'Add supporting document' button at the bottom. At the bottom right, there is a blue button labeled 'Continue to confirmation' with a right arrow and a red circle with the number '5' next to it.

Please review your legal entity change:

Legal entity change details:

Legal entity change name: UK withdrawal transfer from company X to OR Y

Contact person: 
Molina
ECHA  opa.eu
+35846612345

Originating legal entity UUID: **Your legal entity's UUID number is automatically displayed here**


Originating legal entity name: **Your legal entity's name is automatically displayed here**

Legal successor UUID: **The legal successor's UUID is automatically displayed here**

Edit

Legal entity change type

Legal entity change type: Only representative change (Manual selection of assets in REACH-IT)

List of assets:  [Assets list](#)

Edit

Attachments

Document title	Attachment	Comment
Name of my doc	Appointment letter.docx	

Edit



Stop!

- Please check the asset list before continuing to confirm the transfer.
- Check that the asset list does not contain any substances already in the successor account.
- If you transfer a registration or a C&L notification to an account that has a registration or C&L notification for the same substance, the newly transferred asset will be annulled.
- **Registrations and C&L notifications that have been annulled cannot be reinstated.**

By confirming this legal entity change, I declare that the information provided herein related to the legal entity change is true, correct and not misleading.

Do you agree with this information?

2

If yes, confirm your legal entity change

If no, you may edit the information of any step.

Step 4

Status: 'draft'

1. Click to download and Review the asset list

2. Confirm the legal entity change

Legal entity change: Initiator account steps

Step 5
Status: 'created'

- Receive the token from the system
- Provide the token to the successor account

The legal entity change has been successfully created. Please contact the legal entity successor, in order to proceed with the acceptance of the assets transfer.

Legal entity change name:
transfer from company X to OR Y

Token:
111111111112



[Download Confirmation as PDF](#)



[Download assets list as PDF](#)



A message confirming this legal entity change creation will be available in your [message box](#) shortly.



The token and the legal entity name will need to be communicated to the legal successor outside of REACH-IT.

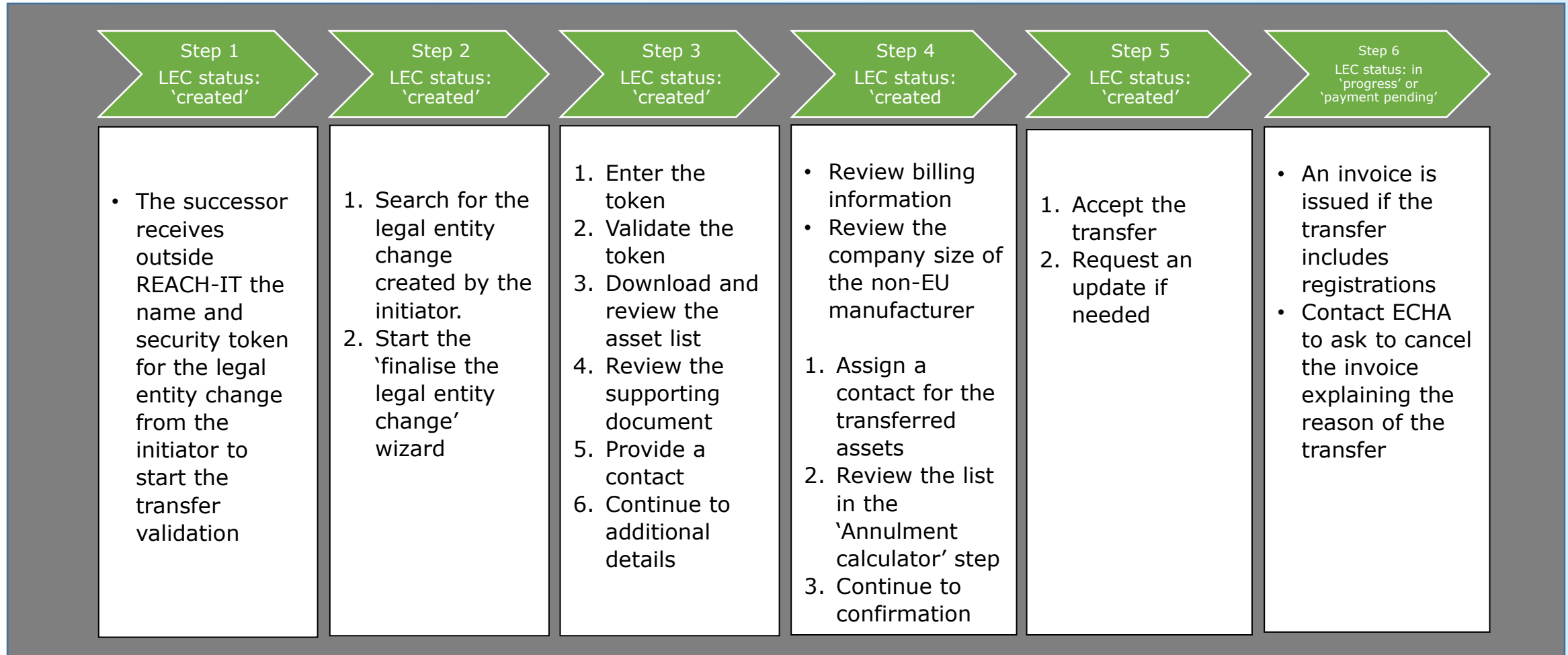
Please contact the legal successor, in order to proceed with the acceptance of the assets transfer. Following successful validation of the legal entity change by the legal successor and, if needed, payment of the related fee, the legal entity change will be completed by transferring the listed assets to the legal successor.

- REACH-IT does not provide the security token to the successor.
- Get in touch with the successor outside REACH-IT to provide the name and token of the legal entity change.



- Following the transfer, update any necessary information to reflect on the changes of the registration after the transfer (i.e. tonnage band, your role, the uses, etc.)

Overview of legal entity change: Successor account steps



Step 1
Status: 'created'

- Legal entity change successor receives the name and the token from the legal entity change initiator to start the transfer validation

Successors will require the name and a security token number to accept the legal entity change.

Both need to be provided by the initiator, outside of REACH-IT.



Validate the token as soon as it has been provided and complete the successor step 3 to verify the asset list and if necessary, provide feedback to the initiator.

Overview of legal entity change: Successor account steps

Step 2

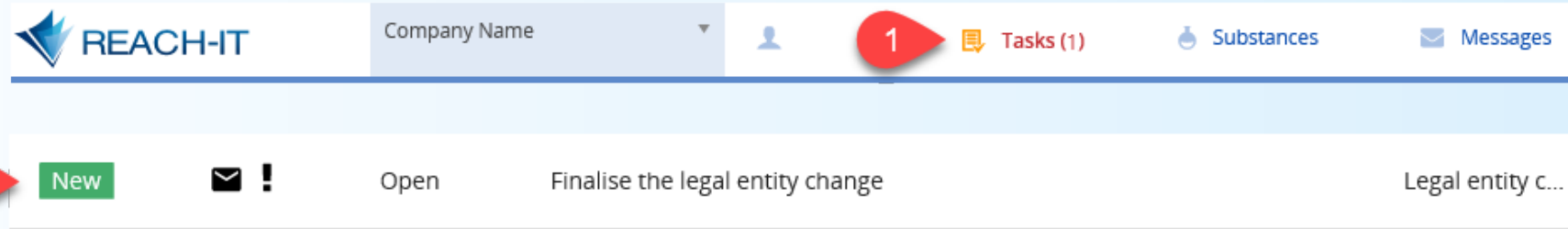
Status: 'created'

- The successor searches for the legal entity change

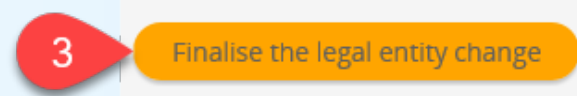
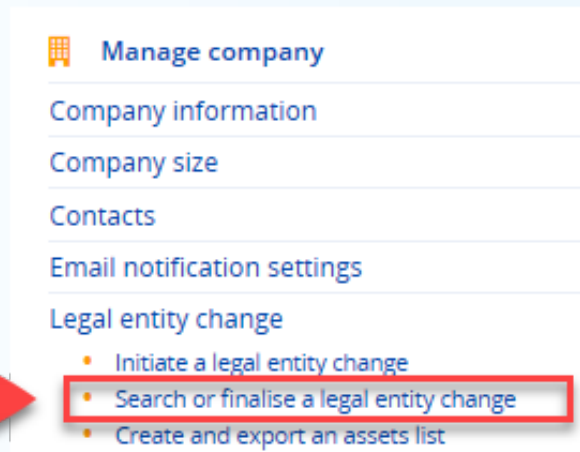
1. Click on 'Tasks'
2. Click on the message: finalise the legal entity change

or

1. Go to REACH-IT 'Menu'
2. Search or finalise a legal entity change. Use the legal entity change name provided by the initiator
3. Finalise the legal entity change



or



Overview of legal entity change: Successor account steps

Step 3

Status: 'created'

1. Enter the token provided by the initiator.
2. Click on Validate the token
3. Download and review the asset list in the transfer
4. Click and review the supporting document
5. Provide a contact
6. Continue to additional details

Legal entity change name: UK withdrawal transfer from company X to OR Y

Token: * 1 Validate 2

Legal entity change type: Only representative change

List of assets: Download 3

Attachments:

Document title	Attachment	Comment
Name of my doc	Appointment letter.docx	4

Contact person: * ?

Successor's Contact person
successorcompany@gmail.com
+358123456789

Assign 5

Continue to additional details > 6



Stop!

- **Review the asset list in the transfer:** if you transfer a registration or a C&L notification to an account that already has a registration or a C&L notification for the same substance, the newly transferred asset will be annulled.
- Registrations and C&L notifications that have been annulled cannot be reinstated.
- The **'Annulment calculator'** step will warn the successor in case of transferring registrations and C&L notifications for which the successor already has registrations or C&L notifications.

Overview of legal entity change: Successor account steps

Step 4

Status: 'created'

- Review the billing information
- Review company size

1. Assign a contact for the transferred assets
2. Continue to annulment calculator

Company name: **Company Name**

Billing address: ⓘ **Successor's REACH-IT billing address is displayed here**

VAT number: **Vat number if your ECHA account contains any**

Invoice language: **English (en)**

Company size: ⓘ **Your company size as per declared in your REACH-IT account is displayed here**

Ownership structure:

Company size updated on: **Last update information**

Purchase order ⓘ *Optional* *Please enter the purchase order number if relevant*

Contact person for all the transferred assets: * ⓘ **Please let us know the contact person for all the assets that are transferred**

Assign **1** **Continue to annulment calculator** **2**

To finalise the legal entity change, make sure that:

- ✓ The **company size** is correct. You can find out [how to determine the company size](#) if you are unsure.
 - ✓ The **VAT number and billing address** in REACH-IT are up to date, and optionally you have a purchase order number: they will appear on the invoice. Legal entity changes are invoiced if they involve the transfer of assets related to a registration or PPORD.
 - ✓ The contact information and third party representative's information for the transferred assets is up to date. After the legal entity change, your company or third party representative's contacts will replace the initiator's contacts. ECHA and the Member States will use this information for sending decisions and communications outside of REACH-IT, or for data-sharing purposes related to the substance.
- ⚠ If ECHA finds that the company size you declare is incorrect, you may have to pay an additional fee and administrative charge. You can find out [how to determine the company size](#) if you are unsure.


Overview of legal entity change: Successor account steps

Step 4
Status: 'created'

1. Review the list provided by the 'Annulment calculator'

- Request modifications from the initiator if needed or continue to confirmation

Calculation performed on: 11/04/2022 07:01 PM

 Download results

EC number	Initiator's asset	Asset type	Successor's asset	Asset type
-----------	-------------------	------------	-------------------	------------

[Request modifications from the initiator](#)

[Continue to confirmation >](#)



Stop!

- Transferring a registration or a C&L notification to an account that already has a registration or a C&L notification for the same substance will result in the annulment of the newly transferred asset.
- The annulment calculator displays the assets (registrations and C&L Notifications) which will be annulled upon completion of the Legal Entity Change process.
- Once the legal entity change is accepted, **the process cannot be reverted.**
- **Registrations and C&L notifications that have been annulled cannot be reinstated.**

Overview of legal entity change: Successor account steps

Step 5

Status: 'created'

1. Accept the legal entity change

- Request a modification from the initiator in case you need it (e.g. in order to avoid the annulment of a registration or C&L notification)

By confirming this legal entity change, I declare that the information provided herein as evidence of the legal entity change is true, correct and not misleading.

Do you agree with this information?

If yes, please accept the legal entity change

If not, you may edit the information of any step, or

Request modifications from the initiator

How to cancel a legal entity change

OVERVIEW

Steps if LEC is not finalised

- The successor can request a modification from the initiator to either edit or cancel the LEC
- The initiator receives a message on REACH-IT to modify the LEC
- The initiator can click on 'Delete' to terminate the LEC

Steps if LEC has been finalised

- If the successor has finalised the LEC on their REACH-IT account: the successor has the option not to pay the invoice
- After the extended due date has passed the transfer will be cancelled and all the assets will return to the initiator account

How to cancel a legal entity change - Steps if LEC is not finalised

The screenshot shows a task management interface with the following elements:

- Header: "Results 1 results found" and a "Download results" button.
- Table header: Status, Subject, Type, Related to, Date, Deadline.
- Table row: Status "Open", Subject "Finalise the legal entity change", Type "Legal entity c...", Date "21/07/2021", Deadline "28/07/2021".
- Task description: "A legal entity change process has been initiated with your company. Please verify and finalise the legal entity change from the legal entity change page." (highlighted with a red box).
- Task information: Legal entity change name "Test5", Originating legal entity name (redacted), Legal successor name (redacted).
- Task reading history: User (redacted), Date "21/07/2021 12:26:40".
- Buttons: "New", "Mark as complete".
- Footer: "Page 1 of 1" and "Items / Page: 25".

Request modifications

- After the initiator has sent the legal entity change request to the successor, the successor will receive a task in REACH-IT.
- If you need to cancel the transfer you will need to start this from the successor account by clicking on the 'Request modifications from the initiator' button in the 'Annulment calculator' step or in the 'Confirmation step'

Request modifications from the initiator

How to cancel a legal entity change - Steps if LEC is not finalised

The screenshot shows a notification bar at the top with a 'New' icon and an envelope icon, followed by the text 'Modifications requested to legal entity change'. Below this is a message box with the following text: 'The successor has requested modifications for the following legal entity change: Name: Test5 Creation date: 21/07/2021'. Below the message box is a red box containing the text 'Please update the legal entity change details in REACH-IT from the legal entity change page.' Below this is a button bar with 'Delete' and 'Edit' buttons. At the bottom is a confirmation dialog titled 'Delete legal entity change' with the text 'Are you sure you want to delete the legal entity change with name: Test5?' and 'Ok' and 'Cancel' buttons. Black lines connect the 'New' icon, the 'legal entity change page' link, the 'Delete' button, and the 'Ok' button to the corresponding steps in the list on the right.

Delete the LEC transfer

- The initiator will receive a message to modify the legal entity change.
- From the message click on the link to access the 'legal entity change page'.
- On the page you will have the option to either 'Delete' or 'Edit' the LEC transfer.
- Once you click on 'OK' from the 'Delete legal entity change', the process of the LEC will be terminated.
- Editing the transfer will take you back to the LEC process from the initiator's REACH-IT account.

How to cancel a legal entity change if LEC has been finalised

- If you find yourself in a situation where from the successor account you have finalised the LEC then there are still ways in which you can cancel your transfer.
- Let the invoice pass its extended due date.
- If the invoice has not been paid by then the LEC will not be considered complete and the assets will return to the initiator account.

Plan your transfers

- To help with the LEC process, you can create a table which compares registrations which are to be transferred between the initiator and the successor REACH-IT accounts.
- In this example the OR represents three non-EU manufacturers and has three REACH-IT accounts. However, REACH-IT account 1 and 3 have registrations which correspond to more than one non-EU manufacturer.
- Before using the LEC functionality the OR can see from the table which accounts have registered the same substances.
- Using this method the OR can already plan a system of transfers and execute the plan when using the LEC functionality in REACH-IT.

Table 1

OR REACH-IT account 1	OR REACH-IT account 2	OR REACH-IT account 3
Amyl Nitrate (non-EU manufacturer 3)	Sulphuric acid (non-EU manufacturer 2)	Menthol (non-EU manufacturer 1)
Menthol (non-EU manufacturer 1)	Ammonia (non-EU manufacturer 2)	Peptide (non-EU manufacturer 3)
Peptide (non-EU manufacturer 1)	Tartaric acid (non-EU manufacturer 2)	Neomenthol (non-EU manufacturer 3)

OR Example Scenario 1: Opening new REACH-IT accounts to transfer registrations

OVERVIEW

Step 1
Identify all
your non-EU
manufacturers

- Review your assets to identify the non-EU manufacturers you represent

Step 2
Open new
REACH-IT
accounts

- Create as many REACH-IT accounts as non-EU manufacturers you represent
- Accept the Terms and Conditions of REACH-IT

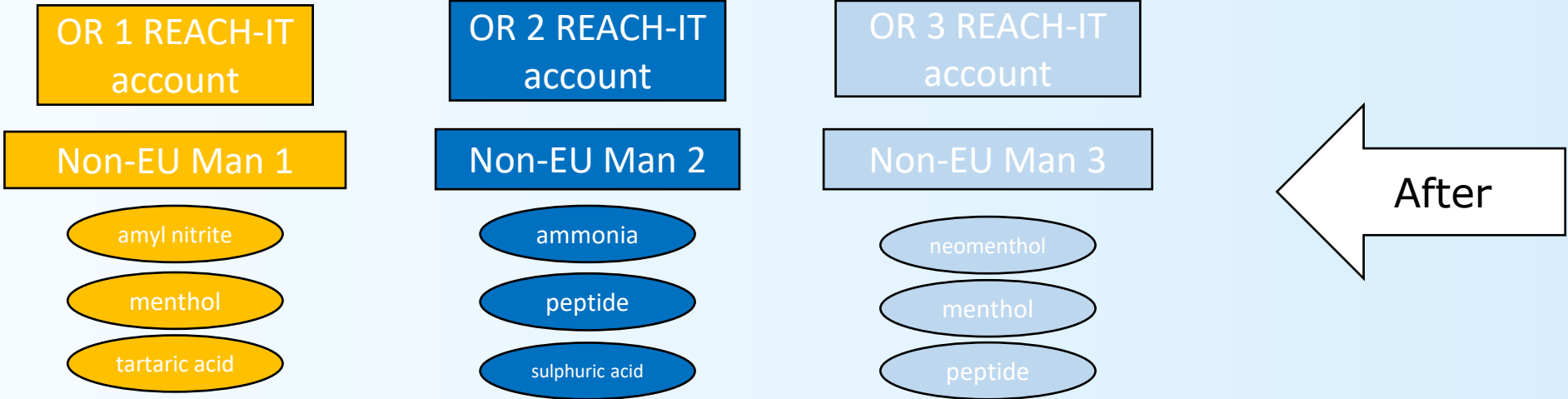
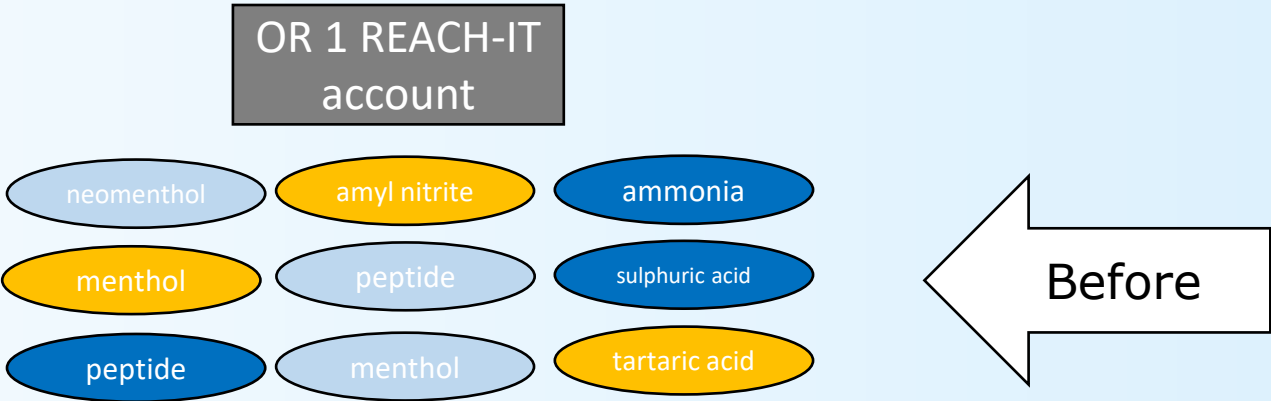
Step 3
Initiate
substance
transfers

- OR initiates the registration transfers using the LEC functionality

OR Example Scenario 1: Opening new REACH-IT accounts to transfer registrations

Step 1
Identify all your non-EU manufacturers

- In this scenario the OR has registrations of three non-EU manufacturers in one REACH-IT account.
- Each account should have registrations which correspond to only *one non-EU manufacturer*.
- The OR can open two more REACH-IT accounts, one for each of the non-EU manufacturers whom they represent.



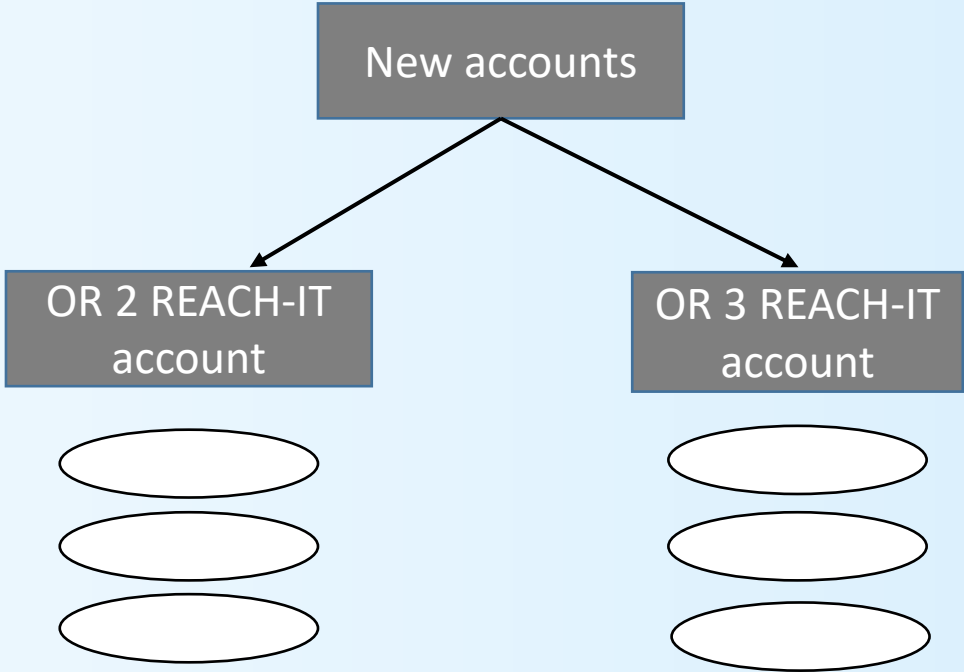
OR Example Scenario 1: Opening new REACH-IT accounts to transfer registrations

Step 2 Open new REACH-IT accounts

- Identify how many REACH-IT accounts you need based on the amount of non-EU manufacturers you represent.
- Then, create the appropriate amount of accounts before beginning the transfer of your registrations.
- Use the LEC functionality to transfer registrations from one account to the other.

OR 1 REACH-IT account

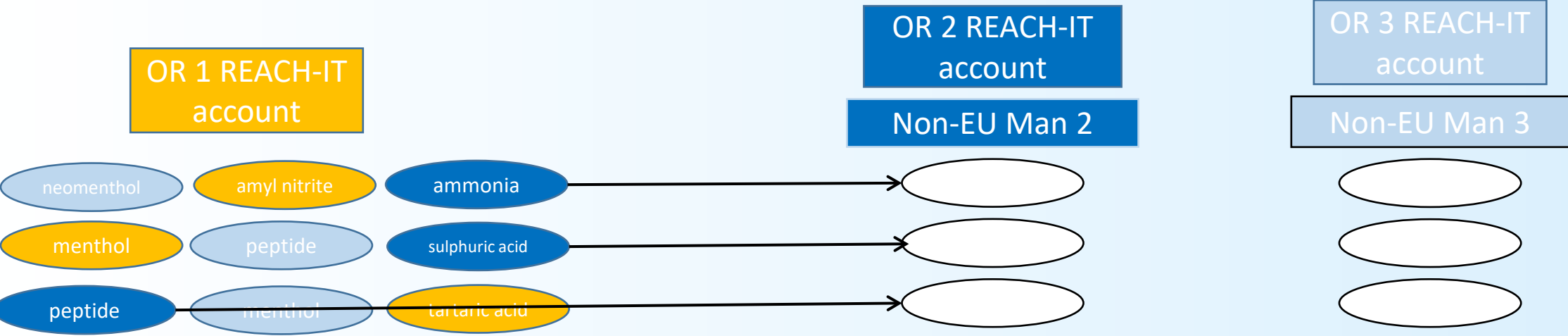
- neomenthol
- amyl nitrite
- ammonia
- menthol
- peptide
- sulphuric acid
- peptide
- menthol
- tartaric acid



OR Example Scenario 1: Opening new REACH-IT accounts to transfer registrations

Step 3 Initiate substance transfers

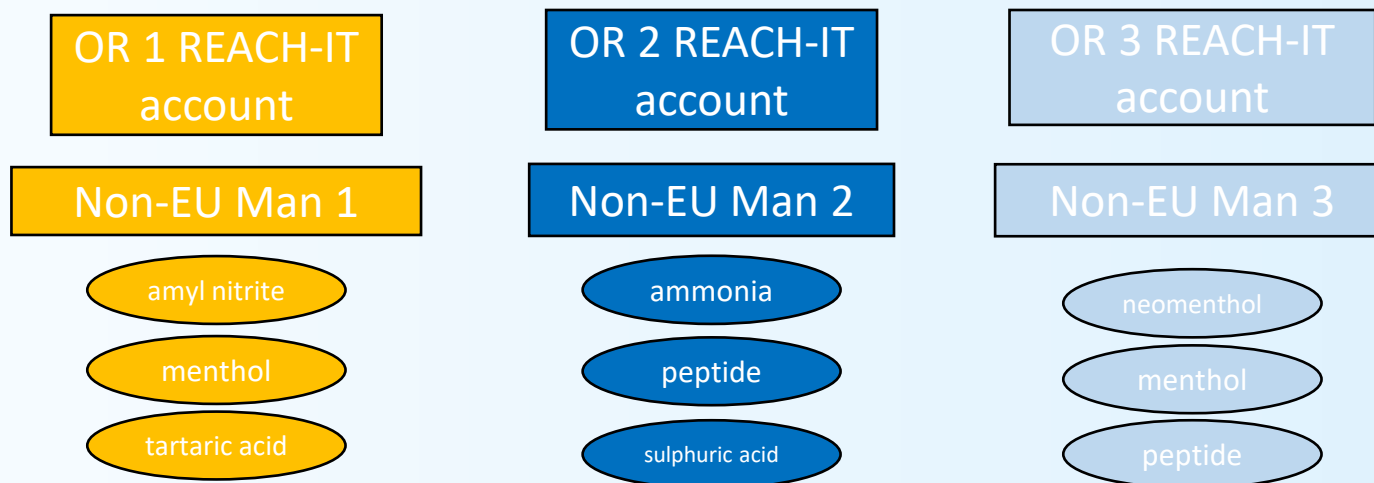
- The initiator can transfer all registrations belonging to OR 2 REACH-IT account at once.
- The initiator can include several registrations in one transfer and can initiate more than one transfer at a time.



OR Example Scenario 1: Opening new REACH-IT accounts to transfer registrations

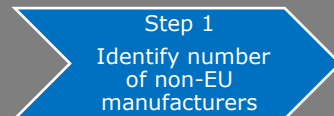
Step 4
Accept
substance
transfer

- Once submitting the transfers the successor can prepare to accept them in REACH-IT.
- After accepting the transfer and receiving the invoice the successor can contact ECHA and explain the reason for the transfer.
- The invoice will be cancelled by ECHA.

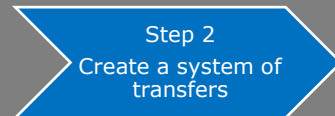


OR Example Scenario 2: Transferring registrations between REACH-IT accounts

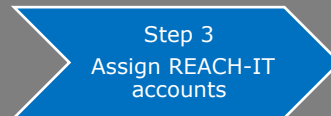
OVERVIEW



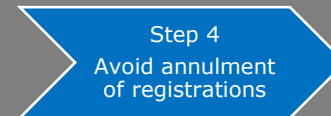
- Identify the number of non-EU manufacturers in your REACH-IT account
- Count how many existing REACH-IT accounts are in your possession



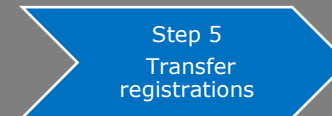
- Create a thorough system to transfer registrations



- Assign REACH-IT account to a non-EU manufacturer



- Map out your sequence of events.
- The OR should be careful not to transfer a registration for a substance that also exists in the successor's account

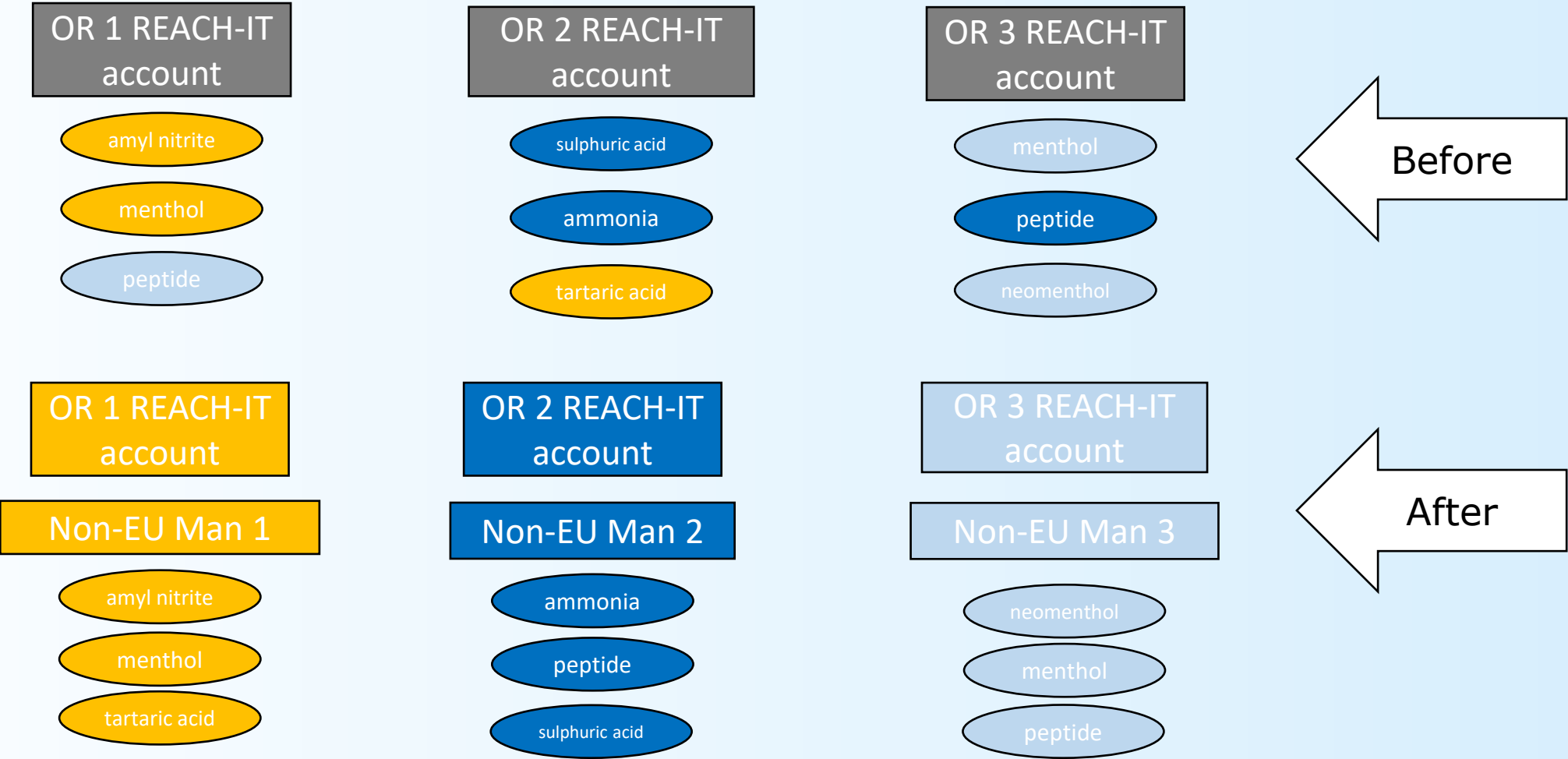


- Transfer registrations so that each REACH-IT account will correspond to one non-EU manufacturer
- Contact ECHA to cancel the invoice explaining the reason of the transfer
- A LEC is not fully completed until the invoice has been cancelled by ECHA
- Ensure you leave enough time to finalise your transfers

OR Example Scenario 2: Transferring registrations between REACH-IT accounts

Step 1
Identify number
of non-EU
manufacturers

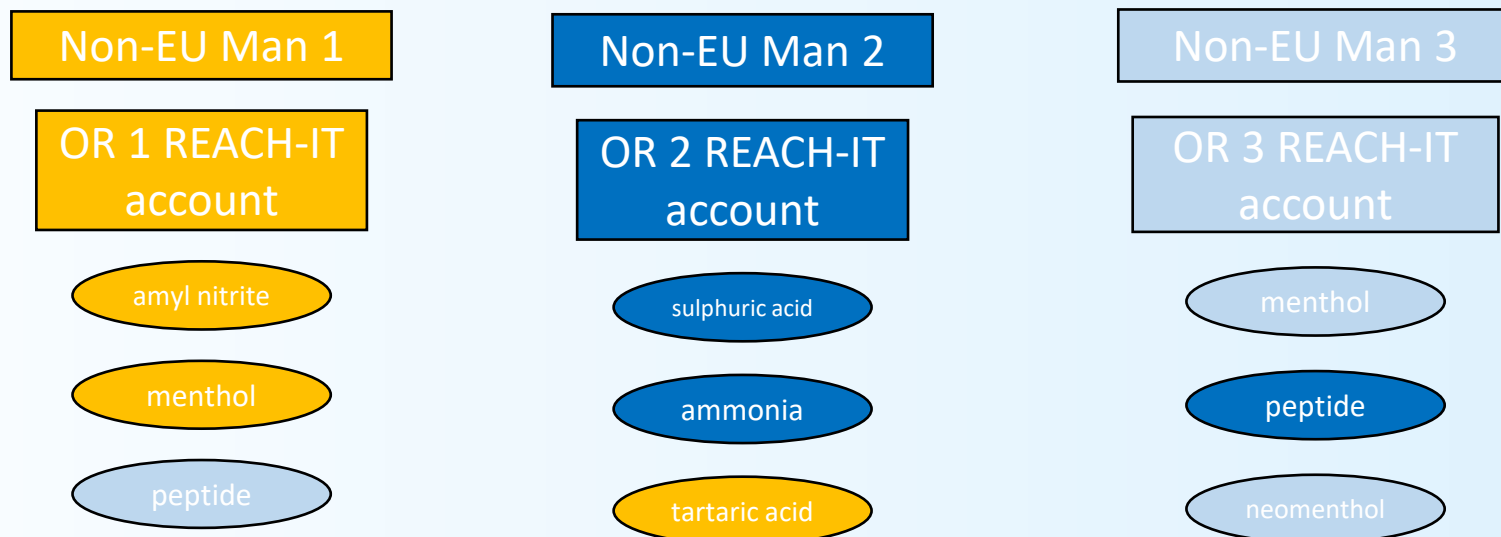
- Here, the OR has several REACH-IT accounts containing registrations from several non-EU manufacturers.
- The objective is to have each REACH-IT account corresponding to one non-EU manufacturer.



OR Example Scenario 2: Transferring registrations between REACH-IT accounts

Step 2
Create a
system of
transfers

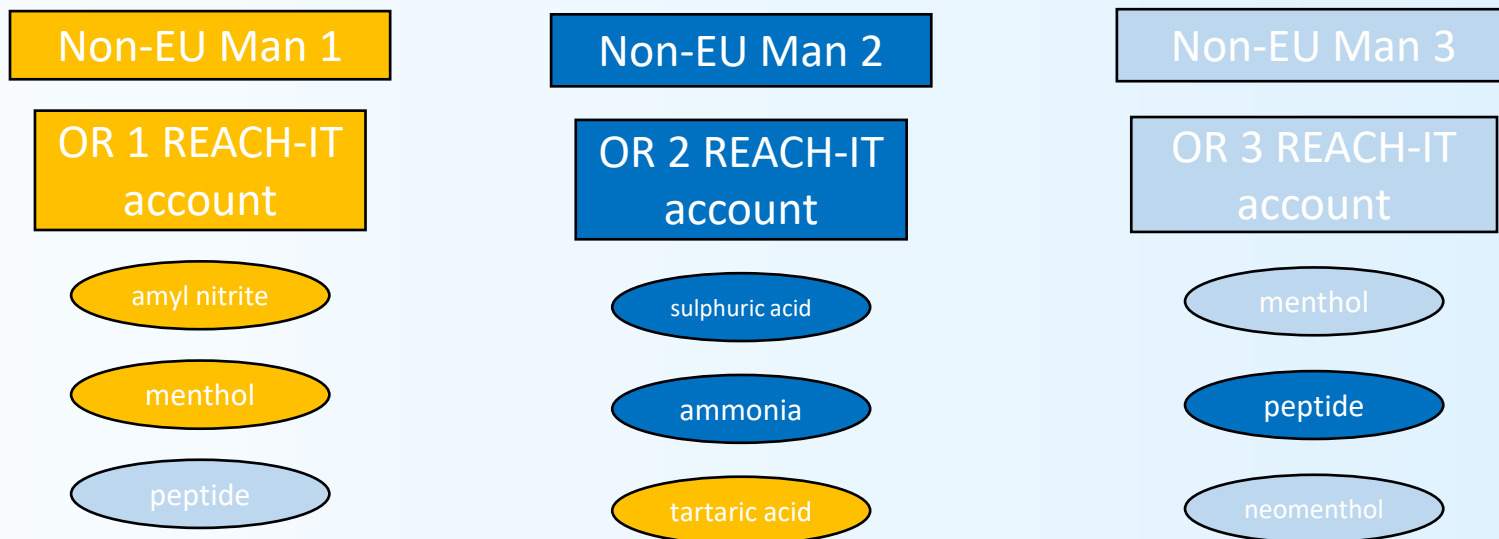
- There are three non-EU manufacturers and three open REACH-IT accounts, the OR can use the LEC functionality to transfer their registrations.
- The OR allocates each account to each non-EU manufacturer whom they represent.
- The final result should be that each REACH-IT account corresponds to **one** non-EU manufacturer.



OR Example Scenario 2: Transferring registrations between REACH-IT accounts

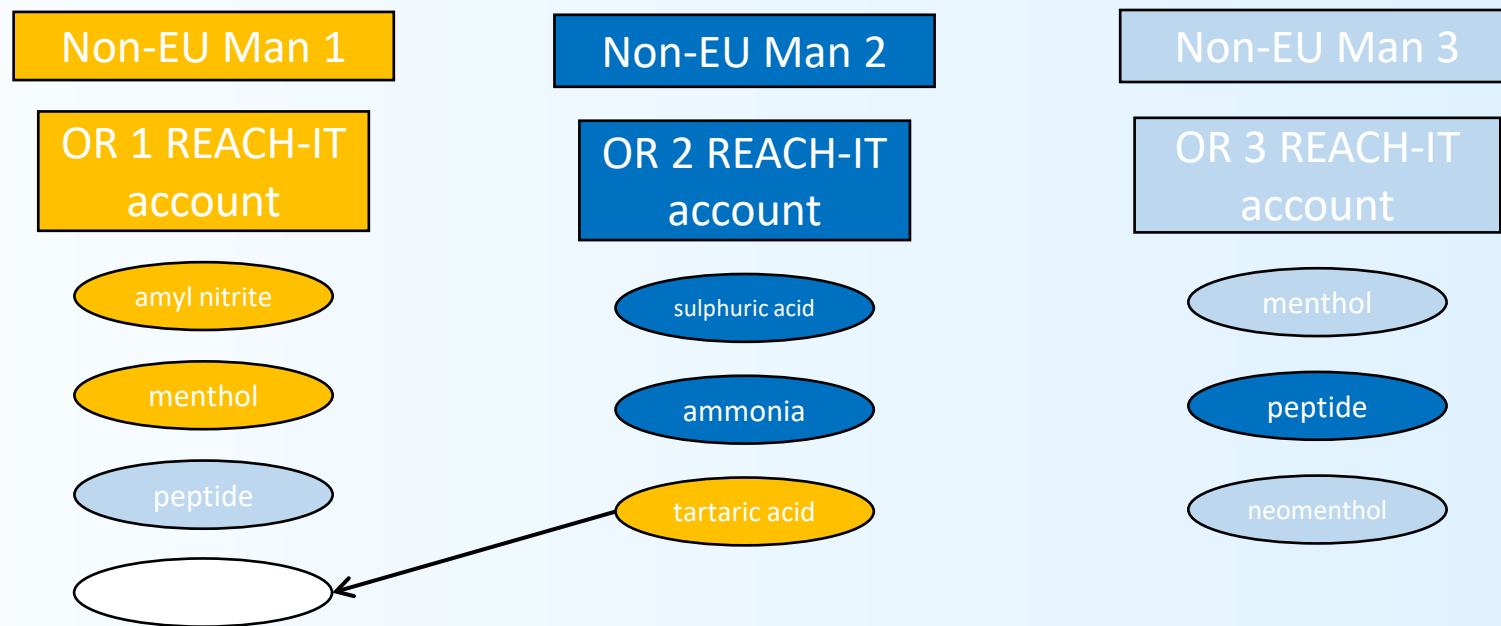
Step 3 Assign REACH-IT accounts

- When assigning REACH-IT accounts to their respective non-EU manufacturers, identify how many registrations correspond to each non-EU manufacturer in your REACH-IT account.
- The non-EU manufacturer with the most registrations in a particular REACH-IT account could be represented in that REACH-IT account.
- In the example below, OR 1 REACH-IT account has more registrations which belong to non-EU manufacturer 1. Thus, the OR assigned the OR1 REACH-IT account to non-EU manufacturer 1.
- This method will result in less transfers while getting your accounts organised.



OR Example Scenario 2: Transferring registrations between REACH-IT accounts

- In the example, the OR decides to transfer all registrations belonging to non-EU Man 1 first.
- The registrations transferred are all different from the registrations already in OR 1 REACH-IT account. Thus, avoiding annulment of registrations.
- The OR initiates the transfers from OR 2 REACH-IT account.

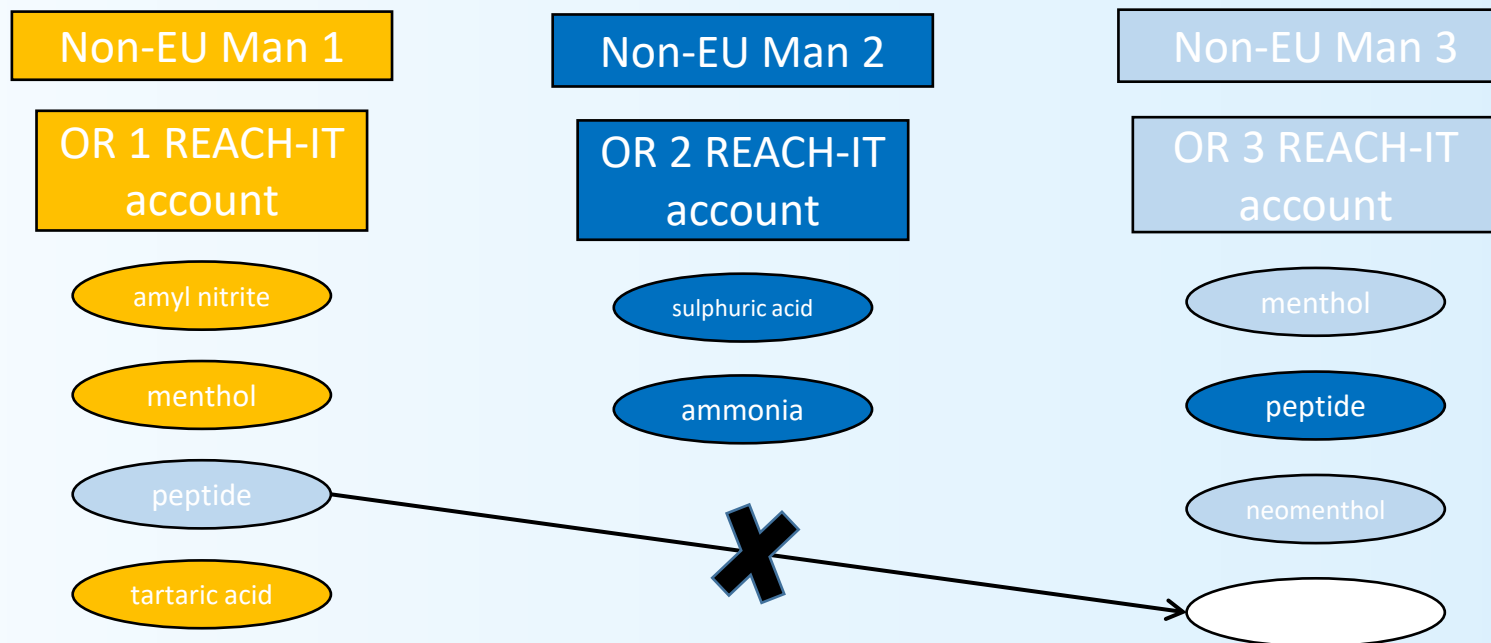


OR Example Scenario 2: Transferring registrations between REACH-IT accounts

Step 3
Avoid annulment
of registrations



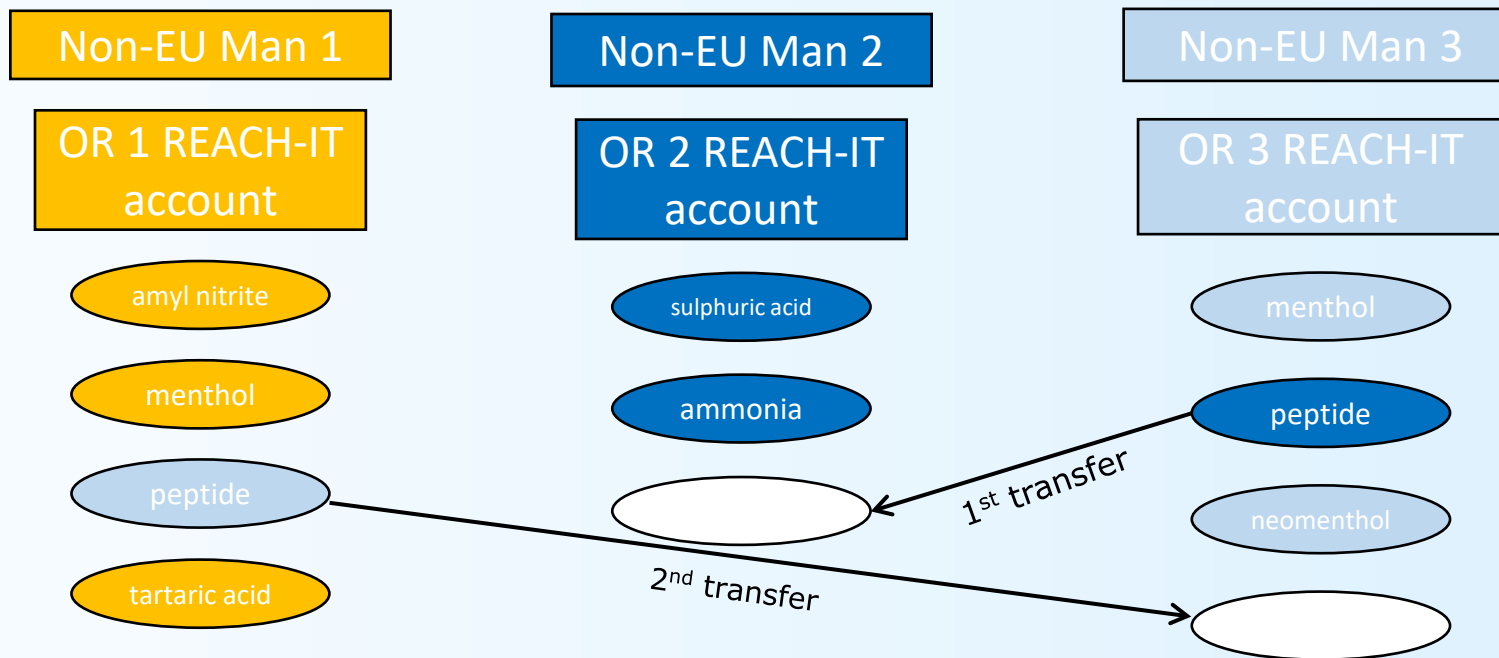
- Ensure you have an organised system in place which maps out which registrations to transfer and when.
- In the example, the OR should not transfer peptide from OR 1 REACH-IT account to OR 3 REACH-IT account because they already have the same substance registered in that account.



OR Example Scenario 2: Transferring registrations between REACH-IT accounts

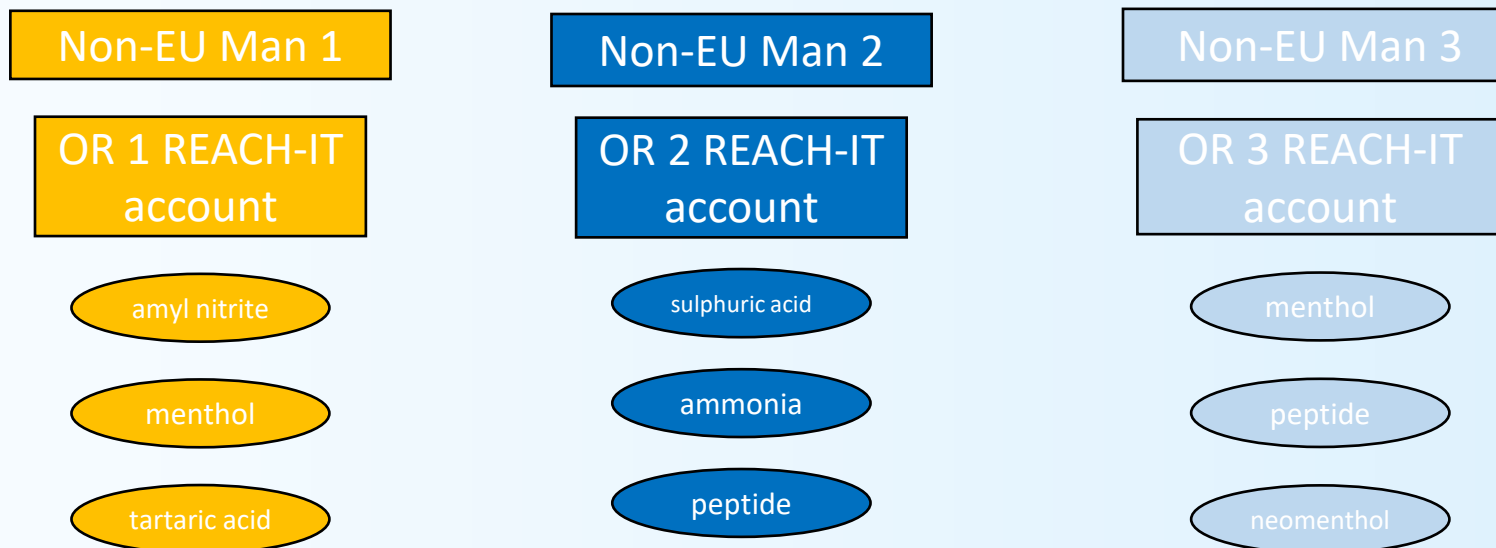
Step 4
Correct order
of transfers

- Transfer peptide from OR 3 REACH-IT account to OR 2 REACH-IT account first.
- Following that, you can transfer peptide from OR 1 REACH-IT account to OR 3 REACH-IT account.



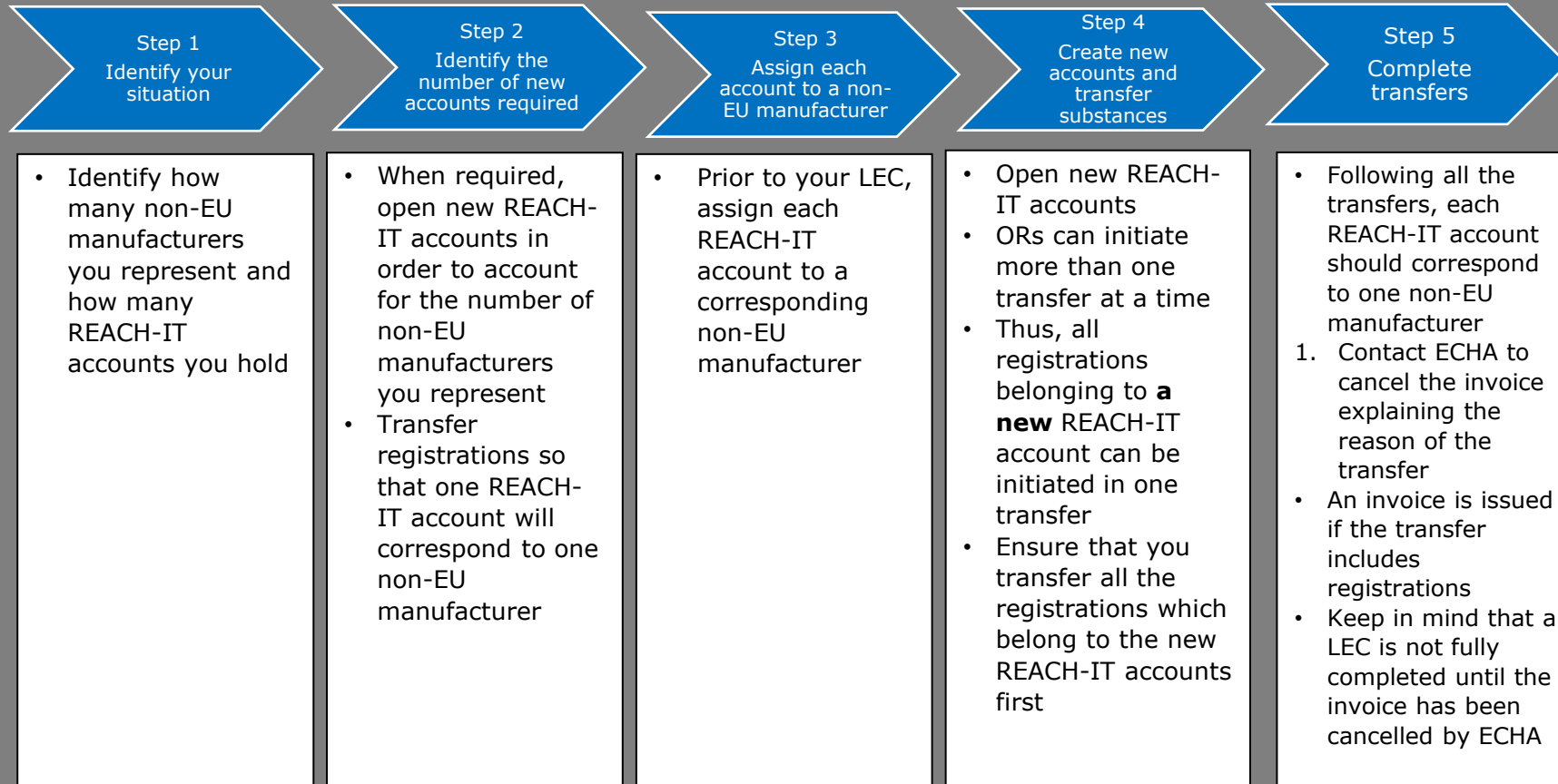
OR Example Scenario 2: Transferring registrations between REACH-IT accounts

- The final result should be that one REACH-IT account belongs to one non-EU manufacturer.
- Ensure that you have created a system which mitigates the chances of your registrations from being annulled.
- Keep in mind that the OR can include multiple registrations in a single transfer.
- Have a strategy in place before using the LEC functionality to ensure a smooth process of transfers.



OR Example Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

OVERVIEW



OR Example Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

Step 1 Identify your situation

- In this scenario the OR has three REACH-IT accounts which correspond to five non-EU manufacturers.
- Here, the OR can open new REACH-IT accounts and transfer registrations between existing accounts.

OR 1 REACH-IT account

- menthol
- tartaric acid
- peptide
- G lakton
- amyl nitrite
- cyclododecane

OR 2 REACH-IT account

- neomenthol
- oxadiaepane
- pin-2(10)-ene
- ammonia

OR 3 REACH-IT account

- menthol
- sulphuric acid
- peptide
- vince lactam
- 2H (chloroform)

← Before

Non-EU Man 1

- amyl nitrite
- menthol
- Tartaric acid

Non-EU Man 2

- neomenthol
- menthol
- peptide

Non-EU Man 3

- ammonia
- peptide
- sulphuric acid

Non-EU Man 4

- G lakton
- Vince lactam
- oxadiaepane

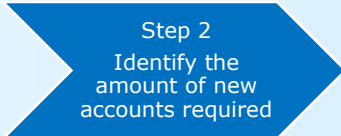
Non-EU Man 5

- cyclododecane
- 2H (chloroform)
- pin-2(10)-ene

← After

OR Example Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

- Identify how many REACH-IT accounts you need based on the amount of non-EU manufacturers you represent.
- The OR should assign each REACH-IT account so that it corresponds to a non-EU manufacturer that they represent.
- Plan a system to transfer registrations which would avoid the annulment of those registrations.
- In this case the OR can first open two new REACH-IT accounts.
- It is recommended that ORs create new accounts when possible and initiate transfers to them first before transferring registrations between existing accounts. This mitigates the possibility of annulment of registrations.



New R-IT accounts

OR 1 R-IT account

- menthol
- tartaric acid
- peptide
- G lakton
- amyl nitrite
- cyclododecane

OR 2 R-IT account

- neomenthol
- oxadiaepane
- pin-2(10)-ene
- ammonia

OR 3 R-IT account

- menthol
- sulphuric acid
- peptide
- vince lactam
- 2H (chloroform)

OR 4 R-IT account

-
-
-

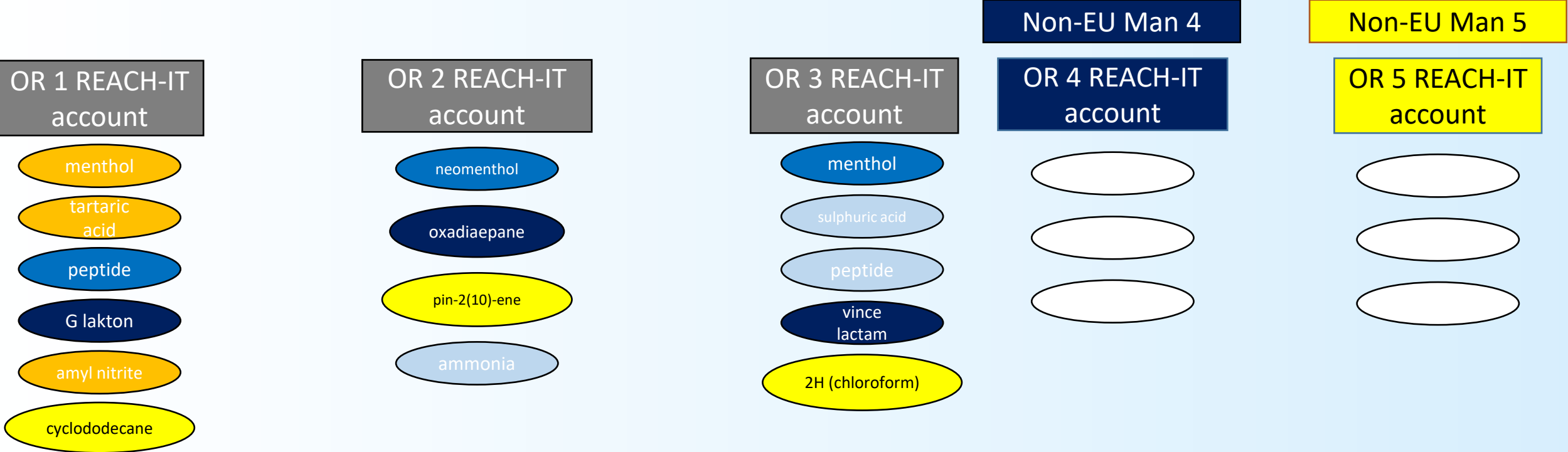
OR 5 R-IT account

-
-
-

OR Example Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

Step 3
Assign each account to a non-EU manufacturer

- Once the OR has opened two new REACH-IT accounts, they can assign those REACH-IT accounts to the non-EU manufacturers that they represent.
- Here, the registrations corresponding to non-EU manufacturer 4 and non-EU manufacturer 5 are scattered evenly across the OR's REACH-IT accounts.
- Therefore, the new REACH-IT accounts will correspond to non-EU manufacturer 4 and 5 respectively.
- This in turn mitigates the chances that your registrations become annulled.



Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

- Now that new REACH-IT accounts have been assigned, the OR can focus on the existing accounts.
- OR 1 REACH-IT account has multiple registrations corresponding to non-EU manufacturer 1.
- Thus they can assign the OR 1 REACH-IT account to represent non-EU manufacturer 1.
- Most of the registrations in OR 3 REACH-IT account correspond to non-EU manufacturer 3, thus they can assign OR 3 REACH-IT account to non-EU manufacturer 3.
- Lastly, OR 2 REACH-IT can be assigned to non-EU manufacturer 2.

Non-EU Man 1

OR 1 REACH-IT account

- menthol
- tartaric acid
- G lakton
- amyl nitrite
- cyclododecane

Non-EU Man 2

OR 2 REACH-IT account

- neomenthol
- oxadiaepane
- pin-2(10)-ene
- ammonia
- peptide

Non-EU Man 3

OR 3 REACH-IT account

- menthol
- sulphuric acid
- peptide
- vince lactam
- 2H (chloroform)

Non-EU Man 4

OR 4 REACH-IT account

-
-
-

Non-EU Man 5

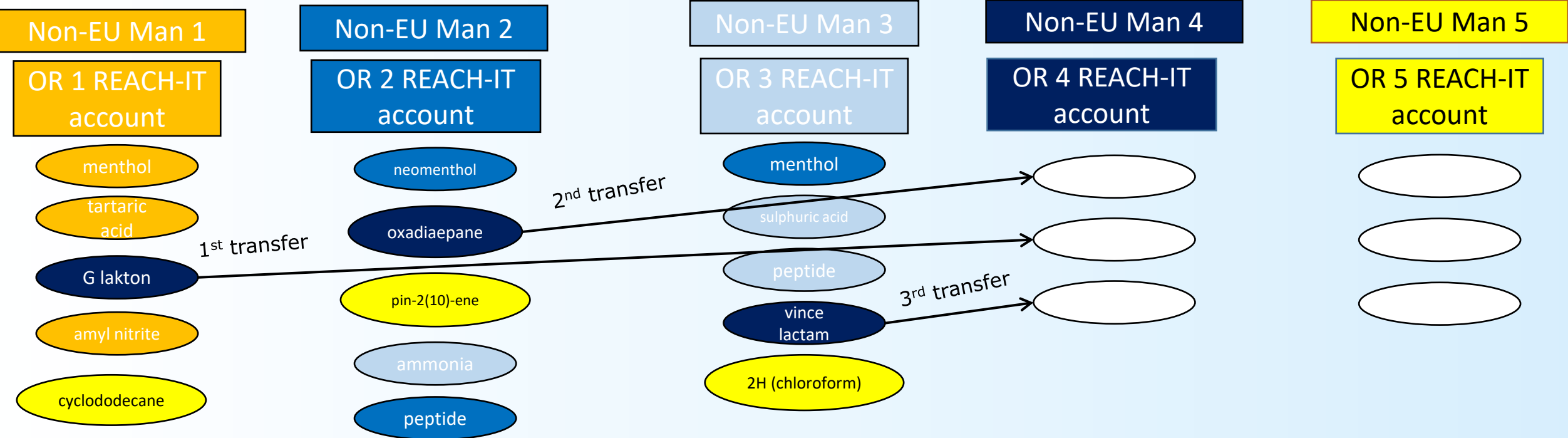
OR 5 REACH-IT account

-
-
-

Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

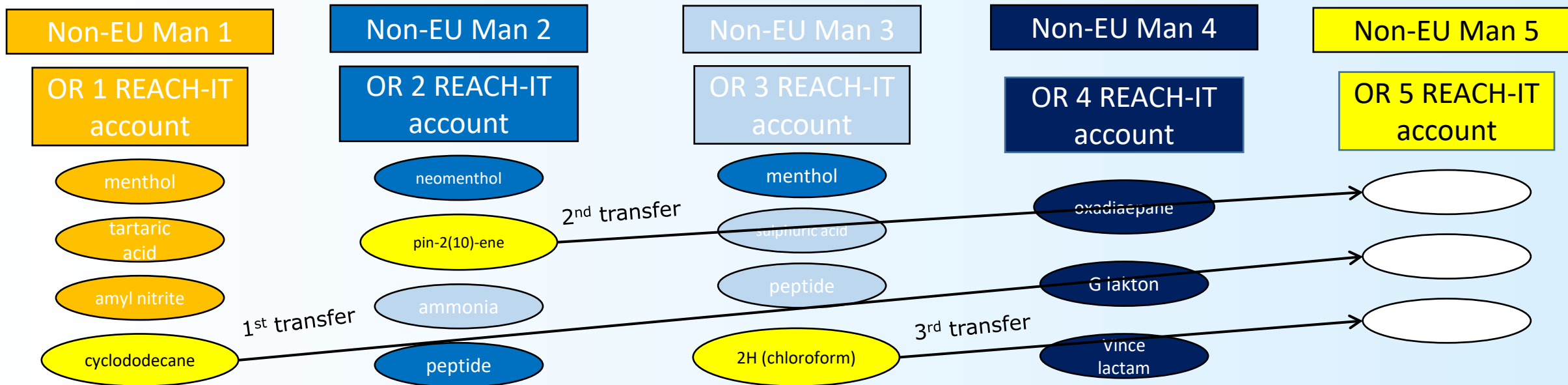
Step 4 Transfer substances

- The OR has decided to transfer all registrations belonging to non-EU manufacturer 4 first.
- The OR will need to log into each REACH-IT account which hold registrations belonging to non-EU manufacturer 4 and begin initiating transfers.
- To avoid the annulment of registrations and C&L notifications **do not accept a transfer** until a previous one is completed and the transferred assets are in your account.



Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

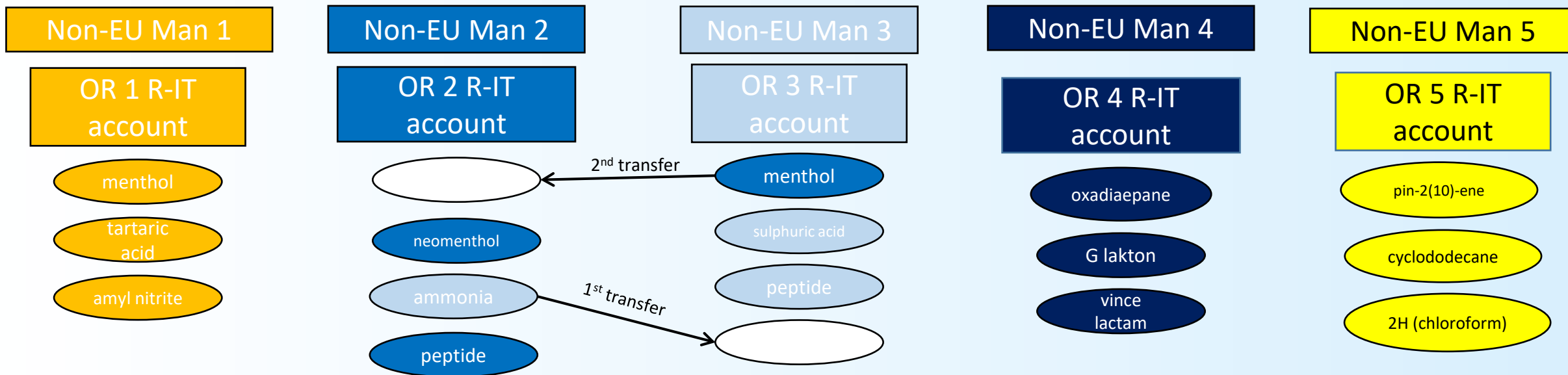
- The OR decides to transfer registrations that correspond to non-EU manufacturer 5 next.
- The OR will need to log into each REACH-IT account that hold registrations that correspond to non-EU manufacturer 5 and initiate the transfers.
- To avoid the annulment of registrations and C&L notifications **do not accept a transfer** until a previous one is completed and the transferred assets are in your account.



Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

Step 5 Transfer substances

- Now the OR must transfer registrations between OR 2 REACH-IT account and OR 3 REACH-IT account.
- A successor cannot be selected if they are the initiator of another pending legal entity change. Therefore, in this case the previous legal entity changes where OR 2 and OR 3 were initiators must be finalised before starting new ones where they are successors.



Scenario 3: OR with multiple REACH-IT accounts belonging to multiple non-EU manufacturers

Step 6
Successor
accepts
transfer

- The final outcome should be that each OR REACH-IT account corresponds to one non-EU manufacturer.
- Transfer your registrations in an order which will ensure that your registrations will not be annulled.

Non-EU Man 1

OR 1 REACH-IT
account

menthol

tartaric
acid

amyl nitrite

Non-EU Man 2

OR 2 REACH-IT
account

menthol

neomenthol

peptide

Non-EU Man 3

OR 3 REACH-IT
account

sulphuric acid

peptide

ammonia

Non-EU Man 4

OR 4 REACH-IT
account

oxadiaepane

G lakton

vince
lactam

Non-EU Man 5

OR 5 REACH-IT
account

pin-2(10)-ene

cyclododecane

2H (chloroform)

OR Example Scenario 4: Creating temporary accounts in REACH-IT to transfer registrations

OVERVIEW

Step 1 Identify your situation

- Identify the number of non-EU manufacturers in your REACH-IT account
- Count how many existing REACH -IT accounts are in your possession

Step 2 Assign your REACH-IT accounts

- Prior to your LEC, assign each REACH-IT account to a corresponding non-EU manufacturer

Step 3 Open a new REACH-IT account

- If you need to transfer registrations between REACH-IT accounts, create a REACH-IT account to temporarily hold your registrations

Step 4 Transfer registration

- Transfer registrations to the temporary REACH-IT account
- From the temporary REACH-IT account, transfer registrations to their corresponding non-EU manufacturer OR account

Step 5 Complete the transfer

- After completing all necessary transfers, the temporary REACH-IT account will be kept empty.
- The successor must contact ECHA to cancel the invoice and thus complete the LEC

OR Example Scenario 4: Creating temporary accounts in REACH-IT to transfer registrations

Step 1
Identify your situation

- If you find that your successor account has the same registration which you are intending to transfer from the initiator account then you might need to create a REACH-IT account to temporarily hold your registration.

OR 1 REACH-IT account

- amyl nitrite
- menthol
- peptide
- tartaric acid
- ammonia

Non-EU Man 1

OR 1 REACH-IT account

- amyl nitrite
- menthol
- ammonia
- tartaric acid
- peptide

OR 2 REACH-IT account

- sulphuric acid
- ammonia
- peptide

Non-EU Man 2

OR 2 REACH-IT account

- sulphuric acid
- peptide
- ammonia

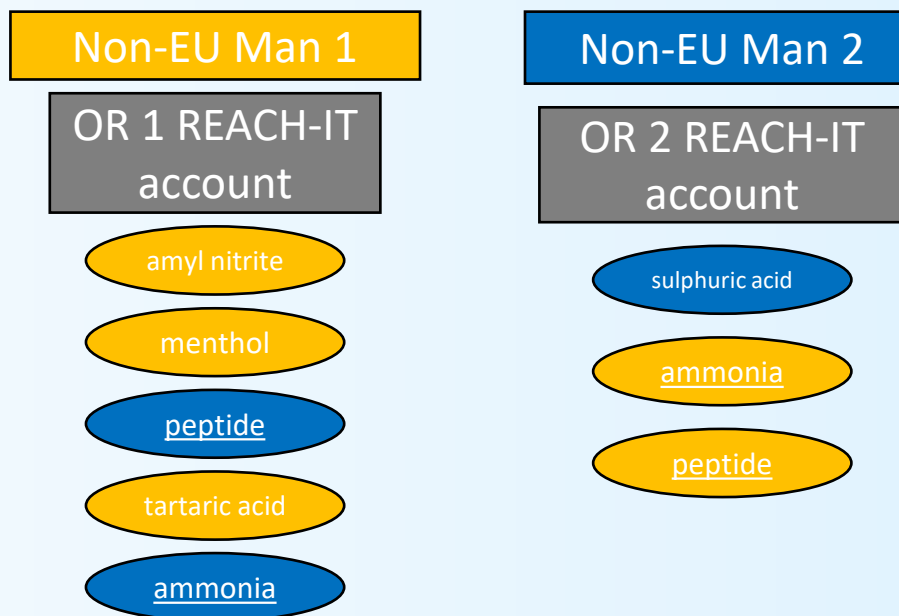
Before

After

OR Example Scenario 4: Creating temporary accounts in REACH-IT to transfer registrations

Step 2 Assign REACH-IT accounts

- Each REACH-IT account will belong to an OR representing one non-EU manufacturer.
- As most registrations in the OR 1 REACH-IT account correspond to non-EU Man 1, it could be assigned to them. Therefore OR 2 REACH-IT account shall have the registrations that correspond to non-EU Man 2.



OR Example Scenario 4: Creating temporary accounts in REACH-IT to transfer registrations

Step 3
Open a new REACH-IT account

- To transfer peptide and ammonia from OR 2 REACH-IT account to OR 1 REACH-IT account, the OR will need to open a new REACH-IT account to temporarily transfer the registrations.
- By creating a new REACH-IT account the OR will be able to avoid the annulment of registrations.
- From there, the OR can transfer all registrations which correspond to non-EU manufacturer 2 to the REACH-IT account that was created to hold your registrations temporarily.

Non-EU Man 1

OR 1 REACH-IT account

amyl nitrite

menthol

peptide

tartaric acid

ammonia

Non-EU Man 2

OR 2 REACH-IT account

sulphuric acid

ammonia

peptide

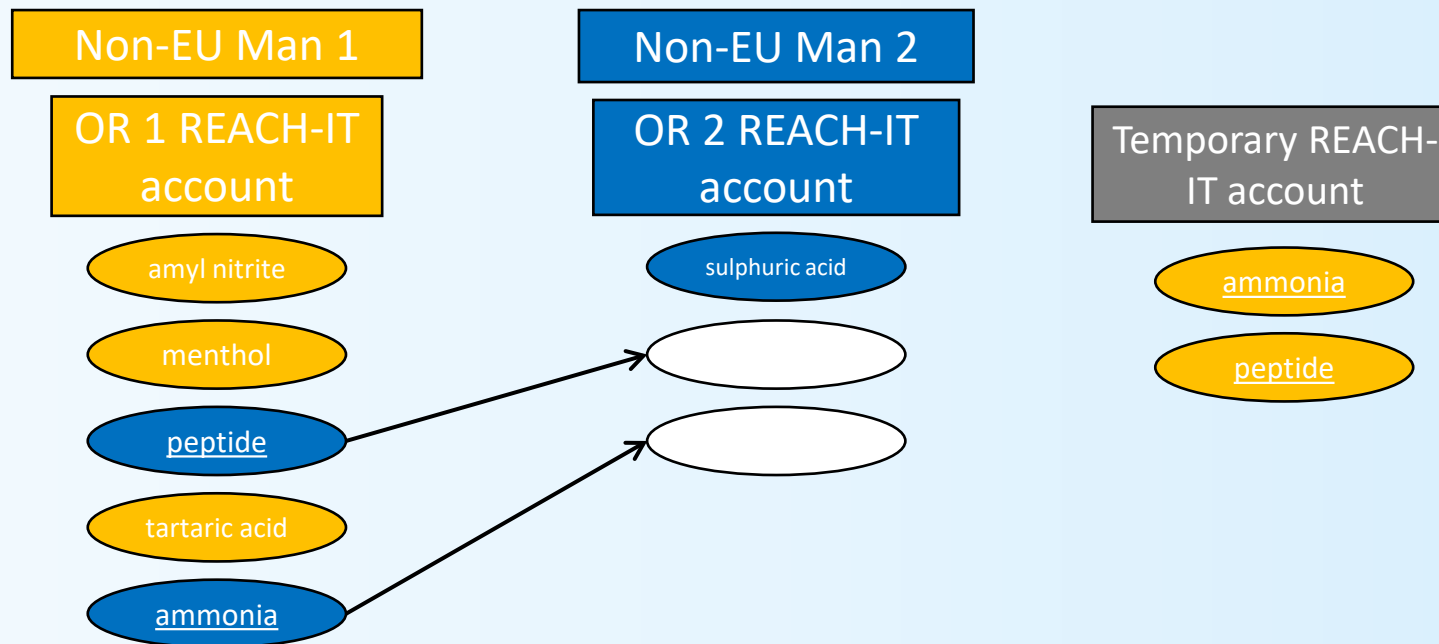
Temporary REACH-IT account



OR Example Scenario 4: Creating temporary accounts in REACH-IT to transfer registrations

Step 3 Transfer substance

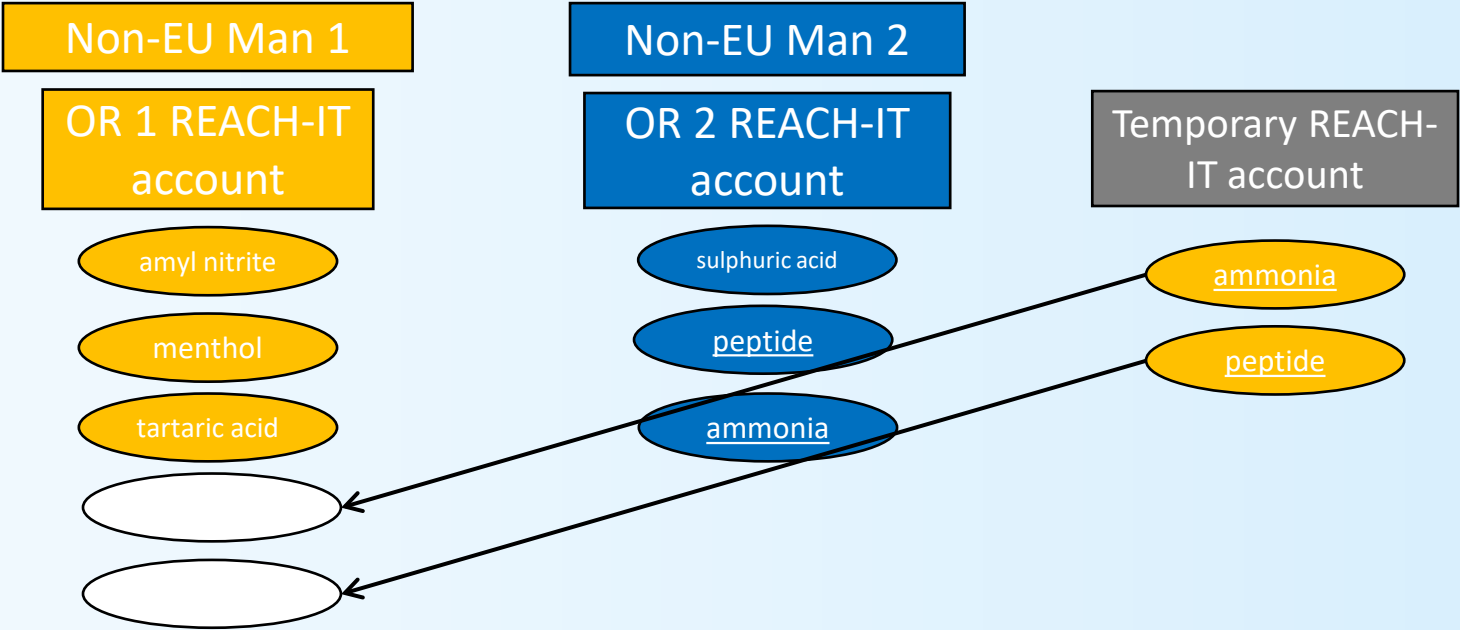
- Now there are no overlapping registrations which exist in OR 2 REACH-IT account.
- The OR can begin to transfer the registrations from OR 1 REACH-IT account to OR 2 REACH-IT account.



OR Example Scenario 4: Creating temporary accounts in REACH-IT to transfer registrations

Step 3 Transfer substance

- Lastly, the registrations from the temporary REACH-IT account can be transferred to OR 1 REACH-IT account.



OR Example Scenario 4: Creating temporary accounts in REACH-IT to transfer registrations

Step 5
Complete the transfer

- Creating a new REACH-IT account will mitigate the chances of your registrations from becoming annulled.
- The temporary REACH-IT account will be kept empty after the transfers.

Non-EU Man 1

OR 1 REACH-IT account

amyl nitrite

menthol

tartaric acid

ammonia

peptide

Non-EU Man 2

OR 2 REACH-IT account

sulphuric acid

peptide

ammonia

Temporary REACH-IT account

EUROPEAN CHEMICALS AGENCY
P.O. BOX 400,
FI-00121 HELSINKI, FINLAND
ECHA.EUROPA.EU