

How to check the information displayed in the Co-Registrants page

The aim of these practical instructions¹ is to support existing registrants, including notifiers under Directive 76/548/EEC, to check which information will be displayed on the Co-Registrants page, covering the situations where a third party representative (TPR) may have been appointed.

Introduction

As recommended in an ECHA News Alert (ECHA/NA/12/46, published on 17 October 2012), registrants that wish to amend their existing dossier(s) in advance of the display of the Co-Registrants page will need to submit a spontaneous update of their registration dossier.

The information in this note remains a useful reminder for future submissions.

Note that the source of the information used to publish contact details on the Co-Registrants page is different from the one published on the ECHA dissemination website. Hence, registrants that submitted a confidentiality request on the company name may still need to perform this check as their claim will not be taken into account in the Co-Registrants page.

Situation 1 - Registrant (or potential registrant) has not appointed a TPR

The identity of the (potential) registrant(s) that have not appointed a TPR will be extracted from the REACH-IT company user account as shown below, within red fields. See REACH-IT Industry User Manual Part 02 - Sign-up and account management (Figure 55).

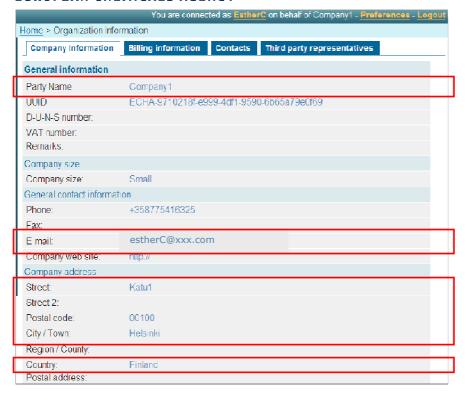
Potential registrants refer to inquirers that obtained their inquiry number as an outcome of a successful inquiry.

To update the general information (section 5.1, Part 02), select <View> from the company menu. The <Organisation Information> page opens and displays four tabs.

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¹ This document will be incorporated into the future REACH-IT Industry User Manual ECHA will release when the Co-Registrants page is available to industry.





Situation 2 – Registrant has appointed a TPR while claiming a registration number for a substance notified under Directive 67/548/EEC

The identity of the TPR (before a dossier is updated) will be extracted from REACH-IT. See REACH-IT Industry User Manual Part 10 – Claim of a registration number for a notified substance (Figure 16).



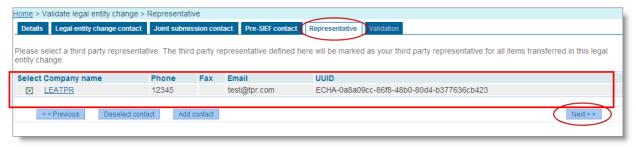
Reminder on how to claim the registration number of a notified substance (under Directive 67/548/EEC) - See REACH-IT Industry User Manual Part 10 - Claim of a registration number for a notified substance.

Important: If the information specified, while claiming the registration number, does not match with that in the notification, REACH-IT will not be able to allocate the registration number. Companies are advised to contact their relevant Member State Competent Authority to solve the situation (http://echa.europa.eu/web/guest/contacts-of-the-member-state-competent-authorities) (see Q&A on For the Registrants of Previously Notified Substances, page 7).



Situation 3 – Registrant has appointed a TPR while accepting new assets following a legal entity change

The identity of the TPR (before a dossier is updated) will be extracted from REACH-IT. See REACH-IT Industry User Manual Part 17 – Legal Entity Change (Figure 29).



Situation 4 - REACH registrant (or potential registrant) has appointed a TPR

The identity of the TPR, specific for the dossier and the substance, will be extracted from section 1.1 of the IUCLID dossier submitted last. Hence, it is **not** retrieved from the information the company may have entered in REACH-IT.

See Data Submission Manual Part 05 - How to complete a technical dossier for registrations and PPORD notifications (Figure 8).



Situation 5 - A company submits an update of their dossier

When a company that submitted an initial registration/inquiry, or claimed a registration number for a substance notified under Directive 67/548/EEC or changed legal entity, spontaneously updates their dossier, the information displayed on the Co-Registrants page will be extracted from section 1.1 of the IUCLID dossier itself whether a TPR is included or not.

For example, if the registrant has submitted both a registration and a request for additional data (under Article 12(2)), the contact details will be taken from the last dossier received by ECHA (ie. from the inquiry, if the registration has not been updated after the inquiry).

In the case of a substance notified under Directive 67/548/EEC (NONS), if the registrant (after claiming their registration number) submits a registration or inquiry dossier, the TPR appointed when claiming the registration will no longer be displayed.

In case of a legal entity (LE) change, if the registrant updates their registration, without including a TPR, the TPR appointed during the LE change will no longer be displayed.

In conclusion, the TPR information needs to be clearly included in section 1.1 of the IUCLID dossier.

The information displayed when the TPR has been appointed (party name, email, address



and country) is the same information as in situation 1.

Summary

The information included on the Co-Registrants page comes from REACH-IT:

- * Where no TPR exists, in case of inquiry, registration, and previous notification
- * Where a TPR is appointed while claiming a registration number for a NONS
- * Where a TPR is appointed during the process of legal entity change

The information included on the Co-Registrants page comes from the IUCLID dossier (1.1):

- * Where a TPR exists, in case of first submission of inquiry and registration
- * For any subsequent update of inquiry, registration, and previous notification, whether a TPR is included or not

Step-by-step instructions for submitting a spontaneous update

- 1-At step 6 in the "dossier creation wizard", you must indicate in the dossier header that the dossier is an update;
- 2-Enter the latest submission number in the corresponding field;
- 3-Select the box "Spontaneous Update";
- 4-In the justification field, select "other" from the drop-down list;
- 5-Provide a justification in the unlabelled field to the right of the justification (e.g. "Third Party Representative").

