



ECHA webinars

EUROPEAN CHEMICALS AGENCY

Webinar: REACH-IT: April 2022 release Questions and answers

ECHA organised a webinar on 18 May 2022 on [REACH-IT: April 2022 release](#).

This document is presented in the form of 'questions and answers'.

It is based on the questions received during the webinar. Editorial changes have been made to improve clarity and similar questions have been combined.

If you need further clarification, or if a specific question has not been answered, [contact us](#).

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Question	Answer
Can a non-EU manufacturer appoint different Only Representatives for different substances?	Yes. This can still be the case, as long as the same substance is not represented by more than one OR.
Hi all and thank you for your support. We are a consultancy and we have a lot of companies via foreign user of REACH-IT. We are acting as OR for one of this companies only, so, is it necessary that we create a new account in that case? Because we understood that one account can acts as OR	If you already have an account for the OR and from that account you are representing just one non-EU manufacturer, you do not need to create an additional account. For each of the non-EU manufacturer you represent you need to have a separate REACH-IT account.
How can you know that you are the only representative of the non-EU company? Can be there more representatives of the same non-EU company? If there is another only representative, are you then just an importer?	<p>For the first question, you will have an appointment letter/contract with the non-EU company to register on their behalf.</p> <p>For the second question, yes, there can be multiple ORs for the same non-EU company each dealing with a different substance.</p> <p>For your last question, if the non-EU company has appointed an OR and registered the substance, you are only importing from that non-EU company and your volumes are covered in the OR registration, you are an importer with no registration obligations.</p> <p>Check Section 2.1.2.4.-2.1.2.5. of the Guidance on registration for more information. https://echa.europa.eu/guidance-documents/guidance-on-reach</p>
What happens in case of incompliance after 14 October? Either that a REACH-IT account is not declared to be an OR account or not, or if still importer registrations exist under a REACH-IT account that has been (rightfully) declared to be an OR account (or vice versa).	Checks will be implemented at dossier submission step to make sure that dossiers submitted as only representatives come from an account where the non-EU manufacturer has been identified. If there are accounts where the role has not been declared, ECHA will discuss on the actions to take.
If you are OR of 3 different non-EU companies and you import for example 11, 24 and 3445 tons of the same substance, you need to register 2 times 10-100t and 1 for >1000t. So you pay registration (dossier/LoA...) and registration fees 3 times, for each non-EU company separately? Is this correct?	Yes, you need a separate REACH-IT account for each of the non-EU manufacturer you are representing, therefore in your specific example, three separate registrations are required. Each of these registrations must correspond to the volumes brought into the EU from their respective non-EU manufacturer.

<p>Can the same registration dossier be used for all non-EU manufacturers - for the same substance? Or you need separate registration dossiers for each company that you import from?</p>	<p>For each non-EU manufacturer, the Only Representative needs a separate REACH-IT account, therefore a separate registration is needed for each of the non-EU manufacturer, even if you are acting as an OR for multiple non-EU manufacturers for the same substance.</p>
<p>What in case if re-arrangement of accounts does result in additional REACH registrations?</p>	<p>If you need additional registrations, you should follow the normal registration process. Start by submitting an inquiry, once accepted, comply with any data sharing and cost sharing obligations, get access to the joint submission and submit the registrations needed by your company.</p>
<p>For almost all of our NONS when claiming the registration number, importer and OR has been entered as role. Do we need to file dossier update for it, if this was the only topic to be addressed, or it the role of the relative LE overruling this entry.</p>	<p>No, declaring the company role in REACH-IT is enough. The information contained in the dossier will remain as it is, it will not be overruled with the REACH-IT information.</p>
<p>'The contact person of the non-EU manufacturer should be a person working for the non-EU manufacturer.' We understood that it is not necessary to be located in the non-EU country but you must work for the non-EU manufacturer (ex: an EU OR affiliate working for the non-EU manufacturer affiliate)</p>	<p>The contact person of the non-EU manufacturer should be a person from the non-EU manufacturer, not a contact from the only representative.</p>
<p>May the non-EU manufacturer contact email address be a generic one: e.g. EUORcontact@XXX.com.</p>	<p>The contact email can be any kind of email address (i.e. individual, functional, generic). The purpose is having a contact point to be used by ECHA in case it would be needed.</p>
<p>We would like to know if the non-EU manufacturer contact person could be the OR responsible person.</p>	<p>The contact person of the non-EU manufacturer should be a person from the non-EU manufacturer.</p>
<p>If the non OR status of a Legal Entity has already been confirmed in REACH-IT, is there a way to reverse it? for instance, in case of past OR activities restarting.</p>	<p>If you are using an account as an OR, then you will always need to use this account as an OR in the future. Of course if you declare by mistake that you are an OR, then contact ECHA's Helpdesk using the contact form: https://echa.europa.eu/contact</p>
<p>If we are attaching the letter of appointment in REACH IT, do we still need to attach it in IUCLID dossier?</p>	<p>If you wish you can still attach the letter of appointment on section 1.7 of IUCLID.</p>

<p>Is it expected to indicate the non-EU manufacturer in each IUCLID dossier? And if yes, will REACH IT check the consistency between the declaration in REACH IT and the IUCLID dossier?</p>	<p>No change is planned regarding the information requirements within IUCLID related to non-EU manufacturers. As it has been until now, registrants will have the possibility to include the non-EU manufacturer information in section 1.7 of IUCLID, but it will not be mandatory there, as opposed to REACH-IT. REACH-IT will check the consistency between the role declared in the UCLID dossier and the role declared in the REACH-IT account.</p>
<p>If we select: 'I wish to disclose the name of the non-EU manufacturer in REACH-IT' it will be disclosed in REACH IT and also ECHA website?</p>	<p>It only will be disclosed in REACH-IT. In the topic help of REACH-IT we provide further explanation: 'Select the tickbox if you wish to display the name of the non-EU manufacturer you represent together with your company name in REACH-IT. This will be visible to other members in the joint submission, joint application of authorisation and Co-registrants pages. Example: Company X (OR of Non-EU company Y).'</p> <p>For those cases when you select a TPR in the joint submission and during the submission of your REACH dossier, then just the TPR will be visible.</p>
<p>When all information on non-EU manufacturers is available for the OR legal entities (mid-October) will this information be also visible in the Joint submissions?</p>	<p>Only when the user of the REACH-IT account ticks the box "I wish to disclose the name of the non-EU manufacturer in REACH-IT" the name of the non-EU manufacturer will be visible in the joint submission (for all the members of the joint submission). The information will be available as soon as the declaration is done in REACH-IT.</p>
<p>The non-EU manufacturer we are representing as OR has multiple manufacturing sites. All manufacturing sites should be declared?</p>	<p>You can add as many sites as you have in REACH-IT for the non-EU company.</p>
<p>A single non-EU Legal entity that appoints the OR may have 2 different manufacture/production sites. Should the OR only declare a single site or is there an option to add other site - with the caveat of course they are the same legal entity as site 1 ? Thank you.</p>	<p>You can add as many sites as you have in REACH-IT for the non-EU company.</p>
<p>Can the Roles information on Sites and Roles section of the Information on the Non-Eu Manufacturer be changed later? If the non-EU manufacturer is acting as a Manufacturer at the moment, but is expected to act also as a Formulator later on, can the second box be checked later on?</p>	<p>Yes, you can edit the information in REACH-IT. Open the main menu > Information on the non-EU manufacturer > Edit.</p>
<p>We have one single non-EU LE that owns several physical manufacturing sites. In the demo it was said that addresses</p>	<p>If you are a single non-EU LE manufacturer with several manufacturing sites, you only need a REACH-IT account. In the 'Sites and roles' step of the declaration you can specify all the sites.</p>

can be added after initial set-up = I need one single REACH-IT account only, correct?	
What is the 'site information' of the non- EU manufacturer?	According to the implementing regulation, it is the site for production or formulation.
When declaring the role of a non-EU principal, can one or more roles be selected? E.g. some substances may be manufactured, and others sent to EU in mixtures. In this case both the role of M and F would apply. Is this possible?	Yes, the role of the non-EU manufacturer can be any combination of Manufacturer, Formulator or/and Article Producer.
When you have to fill the role for the non-EU manufacturer: can we select more than 1 option? (Ex: manufacturer + formulator)	Yes, the role of the non-EU manufacturer can be any combination of Manufacturer, Formulator or/and Article Producer.
Once the declaration of OR non EU-manufacturer is done, how do you move registrations from one OR REACH-IT to another?	The transfer of assets between various account is to be done by using the 'legal entity change module' in REACH-IT, preferably before the declaration of OR in REACH-IT. The process is identical to any other legal entity change. If you carry out the change in order to reorganise your accounts prior to 14 October, you can contact ECHA after you've accepted the transfer, to request the cancellation of the invoice. After 14 October the invoice will need to be paid to carry out the transfer. Read more on our manual 'Only representatives: How to ensure that your account represents only one non-EU manufacturer' at https://echa.europa.eu/manuals .
Which information need to be provided to ECHA to have waived the fee for LE change following re-arrangements of REACH_it accounts?	Contact us via Helpdesk support https://echa.europa.eu/contact and provide an explanation of the situation and the invoice(s) number(s). Read more on our manual 'Only representatives: How to ensure that your account represents only one non-EU manufacturer' at https://echa.europa.eu/manuals .
Is it possible to transfer an OR registration which has ceased import, or does it need to be reactivated first?	Active registrations and registrations that have cease of manufactured can be transferred. Revoked, annulled and invalidated ones cannot be transferred to another account.

<p>What are the consequences in case a REACH-IT account has been rightfully declared to be an OR account but there is still an importer registration associated to this account? Will an update with change of Role in the supply chain will still be possible after October, 14th?</p>	<p>If you declare that you are using an account acting as an only representative, then you only can submit a IUCLID dossiers where you indicate that you are an only representative. Otherwise you will fail business rules.</p> <p>If you see that from the same account you have mixed roles (only representatives and manufacturer/importer) re-arrange your REACH-IT account before 14 October to benefit from the free legal entity change.</p> <p>If in the past you submitted a ICULID dossier where you by mistake declared an erroneous role in the supply chain, you may update the registration by submitting a IUCLID dossier providing the correct role in the supply chain.</p>
<p>What are 'national company ID numbers'? How can these be identified and are they required for all companies?</p>	<p>These are numbers assigned by the company registry of the country where the company is established. This information is not compulsory and needs to be obtained from the non-EU manufacturer.</p>
<p>If you are only importer (you are not OR) from non-EU, what are your obligations? No registration is required in this case? Do you need to buy substances from OR in EU or can you buy directly from non-EU company?</p>	<p>Detailed information on regulatory obligations of importers and ORs is available in the Guidance on registration: https://echa.europa.eu/documents/10162/2324906/registration_en.pdf/de54853d-e19e-4528-9b34-8680944372f2?t=1629205524601</p> <p>If you have further questions contact ECHA's Helpdesk using the contact form: https://echa.europa.eu/contact</p>
<p>Will the webinar be recorded?</p>	<p>The recording will be available right after the webinar ends here - https://echa.europa.eu/-/reach-it-april-2022-release. Follow our YouTube channel "EUchemicals" for updates - https://www.youtube.com/user/EUchemicals</p>
<p>How can I join the webinar?</p>	<p>Watch the webinar on our webpage - https://echa.europa.eu/-/reach-it-april-2022-release. It's also live on our YouTube channel 'EUchemicals' - https://www.youtube.com/user/EUchemicals/videos</p>
<p>In addition to the obligation to declare Non EU-Manufacturer information, the REACH annex update includes information related to substance identification and tox/ecotox data. Will these changes be introduced in the completeness check on the 14 of October 2022 or only after the IUCLID update in 2023?</p>	<p>We invite you to contact us via our webform: https://echa.europa.eu/contact</p>