

How to transfer your UK REACH registrations prior to the end of the transition period of the UK withdrawal from the EU

November 2020

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**How to transfer your UK REACH registrations prior to the end of the transition period
of the UK withdrawal from the EU****Reference:** ECHA-19-H-03-EN**ISBN:** 978-92-9481-092-2**Cat. Number:** ED-01-19-131-EN-N**DOI:** 10.2823/824212**Publ.date:** November 2020**Language:** EN

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Version	Changes	
1.0	First edition	February 2019
1.1	Revised edition for the end of the transitional period Arrangements for Northern Ireland companies added	November 2020

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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>

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Introduction

As a registrant based in the UK, your REACH registrations and notifications will be void following the end of the transitional period of the UK's withdrawal from the EU on 31 December 2020 at 24:00 hours CET (11 p.m. UK time). This document explains how you can transfer them to a company or only representative based in the EU-27, EEA or United Kingdom (Northern Ireland), that will manufacture in or import the substances into the EU/EEA/UK(NI) after the UK's withdrawal. 'The UK' in this manual means the UK with respect to Great Britain, i.e. excluding Northern Ireland.

Registrants based in Northern Ireland (NI), see section 4.

1. Step-by-step approach for transferring your registrations

- Determine your strategy.** Decide what you will do with your registrations and notifications (e.g. PPORDs, inquiries, C&L notifications, DU notifications). When you transfer your registrations and notifications, the company in the EU-27/EEA/UK(NI) that you will transfer to is called your successor. Make sure that if you envisage a transfer, it is an allowed transfer. Allowed transfers (✓) are:

Your successor	Manufacturer in EU-27 or EEA or UK (NI)	Importer in EU-27 or EEA or UK (NI)	Only representative in EU-27 or EEA or UK (NI)
You			
Manufacturer in the UK	 Only if acquisition, relocation or intragroup transfer (see Q&A 1538) or manufacturing site is in NI and transfer to UK(NI)		 (see Q&A 1464)
Importer in the UK		 Only if the importing business is transferred (see Q&A 1539) or importing business is in NI and transfer to UK(NI)	 Only if you are also a formulator (see Q&A 1464)
Only representative in the UK			 (see Q&A 1417)

If you are an only representative, the decision on whom your successor will be needs to be made by the non-EU manufacturer you are representing, but you will need to carry it out in REACH-IT.

- Inform your downstream users** so they can plan their actions accordingly to avoid disruptions in the supply chains.

If you are a lead registrant, **inform your joint submission members**. The lead role is normally transferred together with the registration, but you can also reassign the lead role to a current member of your joint submission. If you are the lead registrant of a joint submission but will not transfer your registration to an EU27/EEA/UK(NI) company, you should reassign the lead registrant role to another member of the joint submission, before 31 December 2020.

If you decide to transfer your registrations and notifications:

3. **Decide who your successor will be.** You can transfer all your registrations together to your successor or you can choose a different successor for different registrations. Agree with your successor. Consider that in REACH-IT your successor cannot be someone else's successor, too: a successor can only be involved in one transfer at a time. Be aware that if your successor already has a registration for the substance, the transferred registration will be annulled, since a company can only have one registration for each substance.

Agree with your successor on the timelines for the transfer. Draw up the contractual arrangements and transfer agreement. If you need to stay registered in the UK until the end of the transition period – for example if you are a manufacturer or formulator appointing an only representative – include a suspensive conditional clause in your agreement.

4. Make sure **your successor is ready in REACH-IT**: they need to have or create an account in REACH-IT and share their legal entity UUID with you.

If your successor is a manufacturer or importer: your successor should validate before the transfer that they have indicated the correct company size in REACH-IT. Their size needs to reflect what the situation will be after the transfer, so they may need to update their size and documentation in REACH-IT.

If your successor is an only representative: ORs need to create a separate account for each UK/non-EU manufacturer or formulator they will be representing. Make sure that you share with your successor the information they need to correctly calculate the company size; ORs need to indicate the company size of the non-EU manufacturer they are representing for each account, regardless of their own company size.

5. **Don't submit updates to your registrations anymore.** Pending registrations – such as registrations undergoing completeness check – cannot be transferred, so if you want to be able to transfer all your registrations, you must make sure that none are pending. Pass on all current and new information you have on the substance to your successor, so they can update the registration after the transfer.
6. Finalise, gather and **convert your transfer agreement** - such as a letter of appointment as only representative - **into PDF**. You will need to upload it as supporting documents in REACH-IT.
7. Initiate the transfer in REACH-IT, using the 'Legal Entity Change' functionality. Follow the practical instructions described below. **Initiate the transfer before 31 December 2020**, as after that you will not have access to any of your REACH assets that have not been transferred from your existing UK account. We recommend you not to leave this to the last moment. ECHA guarantees **timely support until 15 December 2020**. The Agency will be closed between Christmas (24 December) 2020 and 1 January 2021 inclusive and will not be able to answer any questions received during the closure, before reopening on 4 January 2021.

Review your list of registrations and notifications to be transferred and **confirm the transfer to the successor** in REACH-IT before 31 December 2020 at 24:00 hours CET (11 p.m. UK time).

8. If you use a suspensive conditional clause, make sure that **your successor reviews the transfer but does not proceed to accept it yet**. If you or they notice that you forgot to include some registrations, your successor can ask you to "update" the transfer. In this case, make sure to update and confirm again before 31 December 2020 at 24:00 CET.

If you do not need to stay registered in the UK until the end of the transition period, your successor can accept the transfer already now.

9. After the **end of the transition period**, you will no longer have access to your registrations and notifications in REACH-IT, therefore will not be able to initiate any new transfer. You will maintain access to your message box, where you will receive messages on the status of the transfer.
10. **After the end of the transition period**, make sure that **your successor accepts the transfer** in REACH-IT as soon as possible, and within 3 months. This should in any case take place **no later than 31 March 2021**. If the transfer does not include any registrations, the transfer will be complete as soon as your successor accepts it.
11. If the transfer includes registrations, your successor will receive an invoice in REACH-IT. **Your successor will need to pay the invoice** for the transfer **before the extended due date**. The due date will be 14 days after they accepted the transfer, followed by an extended period of 30 days after the initial due date. If the invoice is not paid on time, the transfer in REACH-IT will automatically be undone and your registrations and notifications will be returned to your account, where after the end of the transition period they will be void.

2. Follow-up needed by the successor after the transfer

As a successor, you will need to confirm in REACH-IT that you accept to receive the assets being transferred to you (see step 10 above). Remember that for transfers involving registrations, the process will only be completed, once the invoice is paid (see step 11 above).

During the transfer, as a successor, you will need to review the contact persons assigned to each registration and notification, so ECHA can contact you in case of questions on a registration or notification.

Following the transfer, you also have to review all the registrations transferred to you, and update them to add any new information on the substance, and to reflect the changes after the transfer – for example a change in the registered tonnage band, your role, the composition of the substances, the uses, the information to be kept confidential, etc.

Also be aware that, as a successor, you become responsible for complying with any decisions addressed to your predecessor and keeping the registration up to date. With the transfer of a registration, any potential role within the joint submission is also transferred to the successor. Therefore, in case of a transfer of a lead registration, the successor will receive the lead registrant's role within the joint submission, while in case of a member registration, the successor will become a member of the joint submission.

3. Cancelling your transfer

If you want to cancel your transfer, you will need to arrange this with your successor. Your successor will need to ask you in REACH-IT to 'update' the transfer (see step 8 of the practical instructions below). When you receive the request for update, choose to 'delete' the transfer. This will cancel the transfer and restore all your registrations and notifications in your account in REACH-IT.

If your successor has already accepted the transfer, and if the transfer included registrations, your successor must not pay the invoice (see step 12). This will cancel the transfer and restore all your registrations and notifications in your account in REACH-IT.

Be aware of the timelines: if your successor requests you to update after 31 December 2020, the assets contained in the legal entity change will be returned to your account, where they will become void.

4. Advice for companies in Northern Ireland

Based on the Protocol on Ireland and Northern Ireland, companies manufacturing, importing or using chemicals in Northern Ireland must continue to fulfil their obligations under REACH after the end of the transition period.

During November 2020, ECHA contacts those having registrations and notifications (i.e. PPORDs, inquiries, C&L notifications, DU notifications) with instructions on how they can ensure continuity in their compliance under REACH.

If your company is based Northern Ireland and has not been contacted, please inform us via the contact forms at <https://echa.europa.eu/contact> before 15 December 2020.

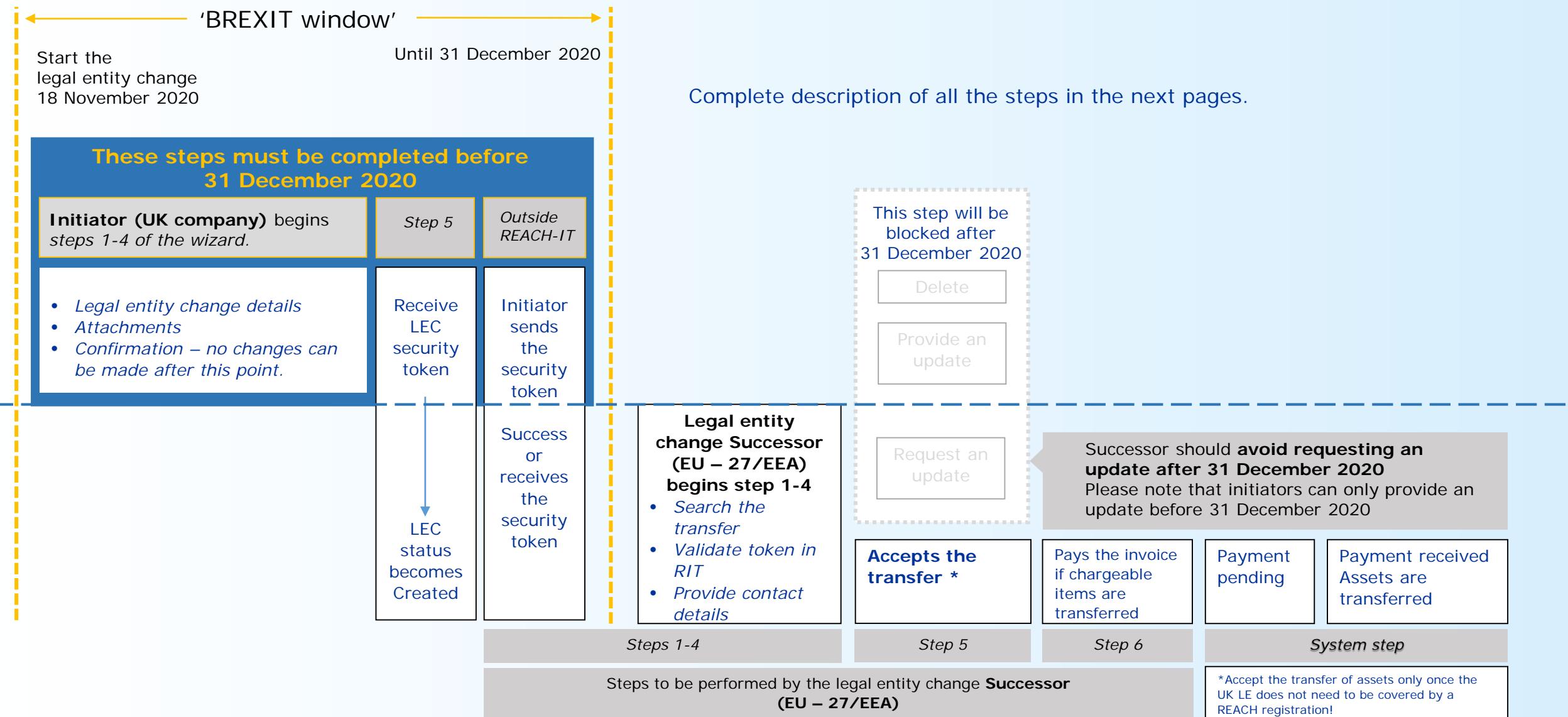
Companies currently headquartered in the United Kingdom with a site (e.g. a manufacturing site) in Northern Ireland, who will not be transferring their registrations to a company in the EU-27/EEA, should consider how to ensure that their manufacture, import and use in Northern Ireland remains compliant under REACH after the end of the transition period.

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

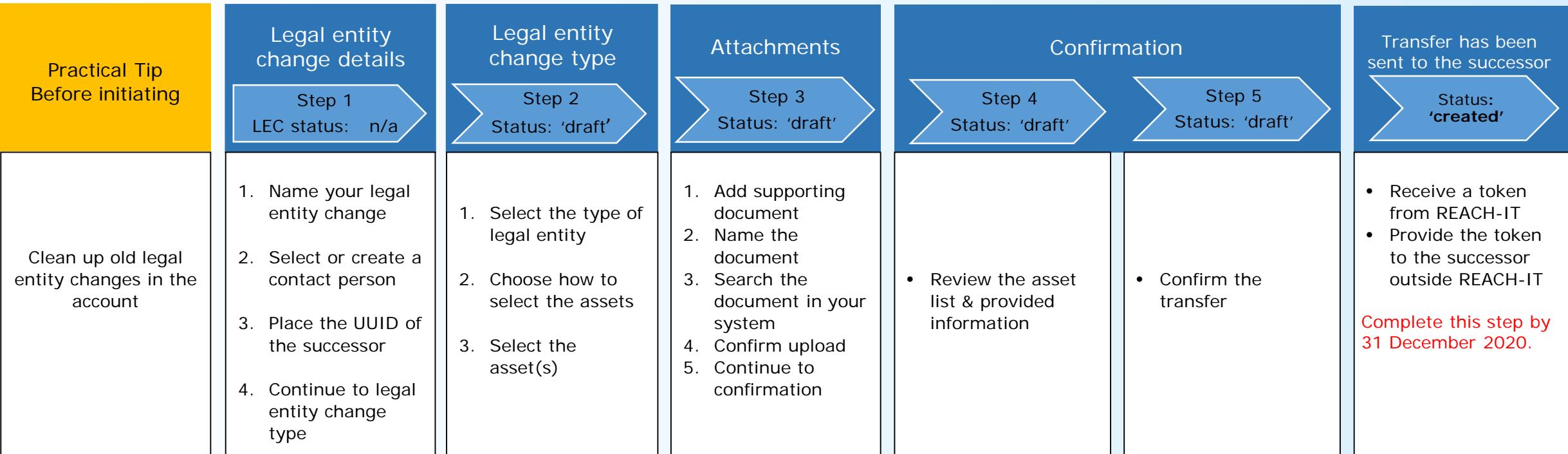
The following step-by-step instructions explain how to use the wizard of the legal entity change functionality in REACH-IT to transfer UK REACH registrations and notifications in view of the UK withdrawal from the EU.

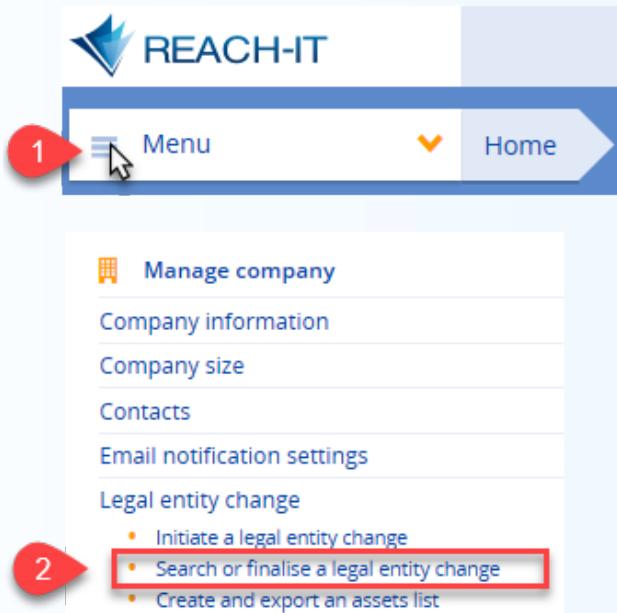
Still have questions? Read the new [manual on legal entity change](#), our [Brexit pages](#) or contact ECHA through the [contact forms](#).

Overview of the legal entity change functionality in REACH-IT



Legal entity change wizard - Initiator's steps





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

A screenshot of the REACH-IT Advanced search interface. At the top, there is a search bar with the placeholder 'I am looking for: Legal entity changes'. Below the search bar are two sections: 'Locate' and 'Filters'. The 'Filters' section contains a dropdown for 'Legal entity change status' with 'Draft' selected. A red arrow labeled '3' points to the 'Draft' option. At the bottom of the screen are 'Search' and 'Clear' buttons, with a red arrow labeled '4' pointing to the 'Search' button.

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	<input checked="" type="checkbox"/>

Page 1 of 1 « 1 » Items / Page: 25

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**.

REACH-IT

Menu **Home**

- 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

Step 1

LEC status: n/a

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

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

2 Contact person: * Hugo Molina
ECHA@echa.europa.eu
+35846612345
Assign contact

3 Originating legal entity UUID: Your legal entity's account UUID is automatically displayed here
Originating legal entity name: Your legal entity name is automatically displayed here

4 Legal successor UUID: * Place your the UUID provided by the successor here

Continue to legal entity change type ➔

This field does not define the successor, it is only used to give a name to this transfer.

To highlight the reason for the transfer, you may wish to include the term **UK withdrawal**, at the beginning of your legal entity change name, e.g. **UK withdrawal + your LEC name**.

UUIDs only become valid after the REACH-IT terms and conditions have been accepted. If the successor 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**”.



Step 2
Status: 'draft'

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

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

ECHA will exceptionally allow to use the "Legal entity change" functionality in REACH-IT to address new scenarios brought about by the UK's Withdrawal. Therefore in this page of the wizard, 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.

UK manufacturers and **importers** are advised to choose the '**Merger**' option if all registrations will be transferred to the same successor, otherwise to use the '**Split**' option.

Step 2

Status: 'draft'

3. Find your assets:
Search for the
assets

Or

4. Click and select
each asset.

5. Continue to
attachments

3

a Find assets

Locate ?

Filters

Reference number: Please enter a minimum of three characters

Asset type: Select an asset type

Substance identity (EC, CAS, name): Please enter a minimum of three characters

Submission date: from: dd/mm/yyyy to: dd/mm/yyyy

Search

Clear

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

♦ Reference number

▼ Asset type

♦ Substance

01-22222222-22-0000

Registration

EC: 200-817-4 CAS: 74
chloromethane

4



01-2112112111-11-0006

Registration

EC: 214-302-7 CAS: 1120-2...
decyltrimethylamine

+

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 ➔

Step 3
Status: 'draft'

1. Add the supporting document
2. Name the document
3. Search the document in your system
4. Confirm upload
5. Continue to confirmation

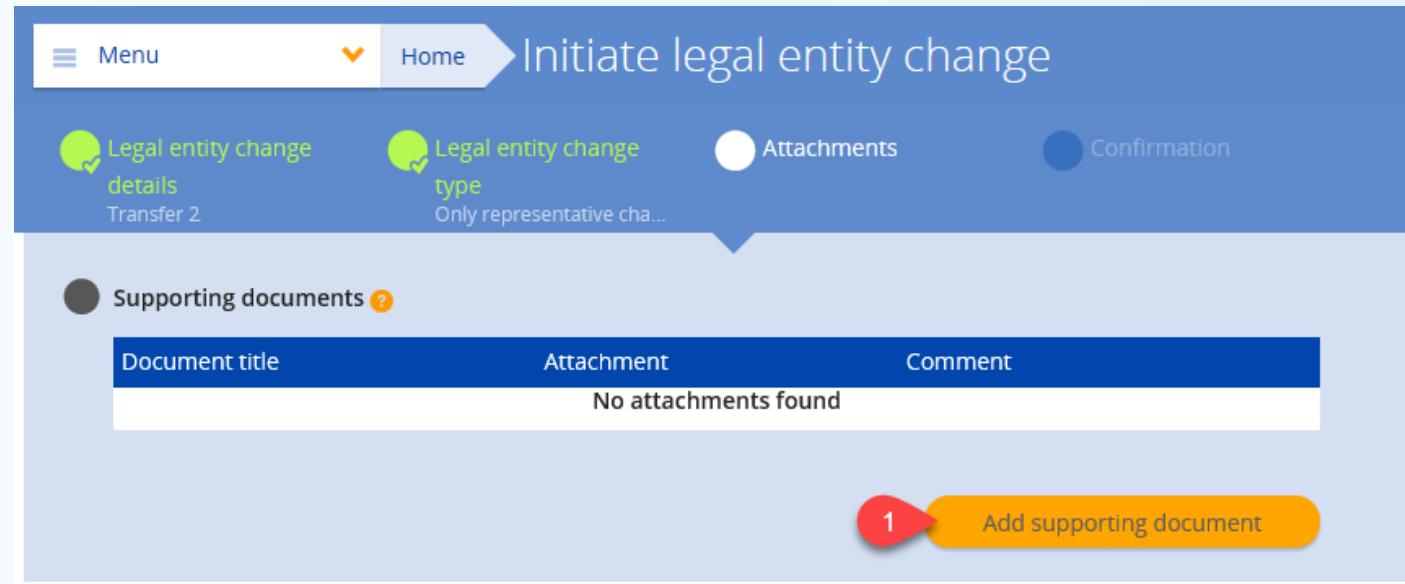
Initiate legal entity change

Legal entity change details Transfer 2 Legal entity change type Only representative cha... Attachments Confirmation

Supporting documents ?

Document title	Attachment	Comment
	No attachments found	

1 Add supporting document



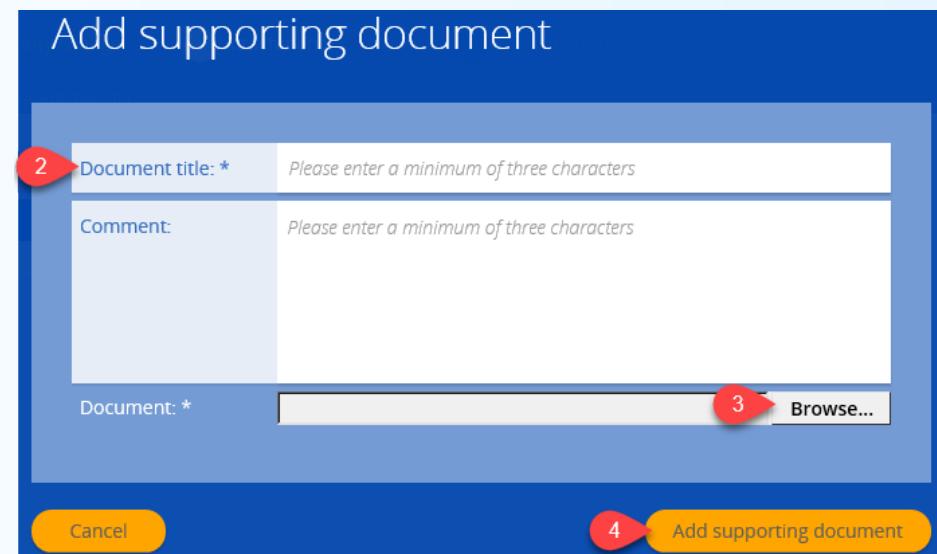
Add supporting document

2 Document title: * Please enter a minimum of three characters

Comment: Please enter a minimum of three characters

3 Document: * Browse...

Cancel 4 Add supporting document



5 Continue to confirmation ➔

Step 4
Status: 'draft'

1. Click to download and Review the asset list
2. Confirm the legal entity change

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:
 Hugo Molina
 ECHA@echa.europa.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 confirming the transfer. If the asset list is not correct, please edit it at this point.

Remember to confirm this step by the end of the transitional period, 31 December 2020.

If you transfer a registration to an account that already has a registration for the same substance, the newly transferred registration will be annulled. Registrations 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?

If yes, confirm your legal entity change

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

Step 5
Status: 'created'

- Receive the token from the system
- Provide the token to the Successor company

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:
UK withdrawal 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.

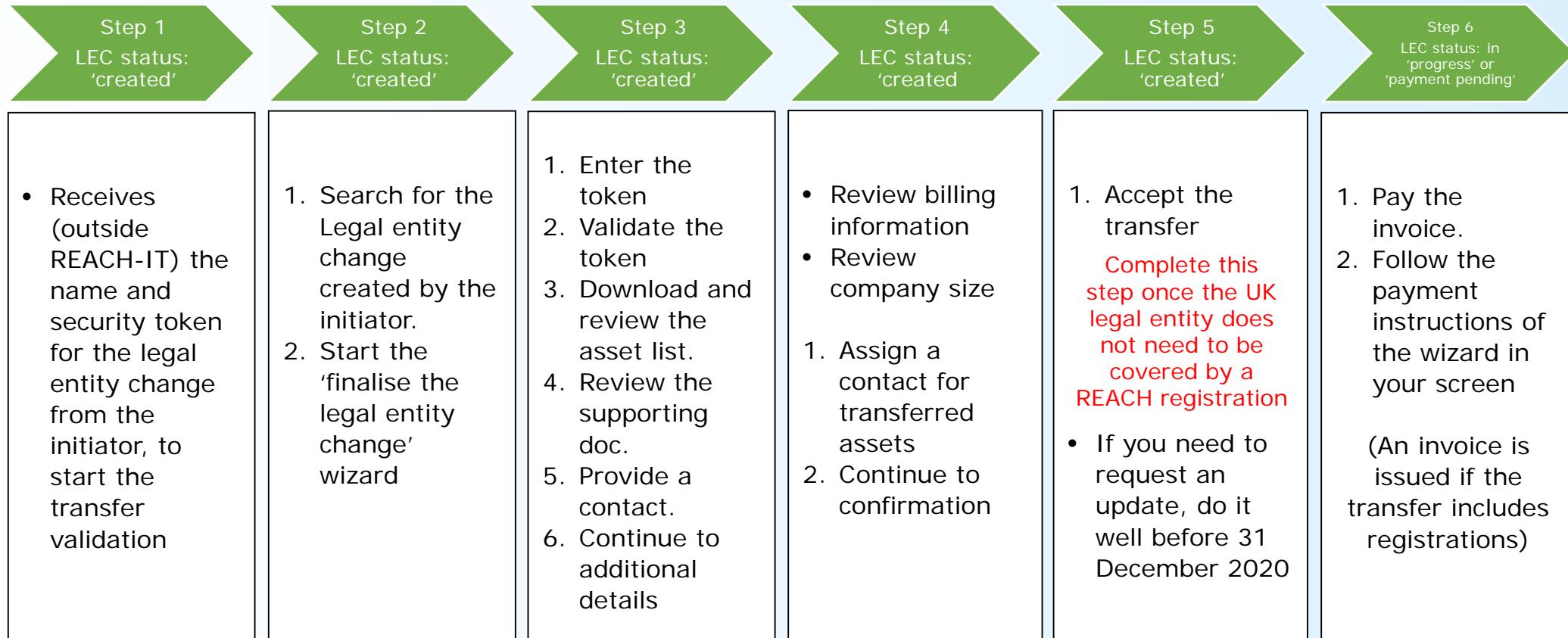
REACH-IT does not provide the security token to the successor.

Get in touch with the successor outside REACH-IT to provide the token.



ECHA recommends that successors (EU – 27/EEA) start the validation of the token (successor's step 3) as soon as possible, in order to review the asset list and provide feedback to the initiator if needed before 31 December 2020.

Legal entity change wizard – Successor's steps



Step 1
Status: 'created'

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

Successors (EU – 27/EEA) will require a name and a security token number to accept the legal entity change.

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



ECHA suggest that you validate the token as soon it has been provided and complete successor's step 3 to verify the asset list and if necessary, provide feedback to the initiator.

However, successors should wait with the completion of step 4, until after the UK legal entity does not need to be covered by a REACH registration.

Step 2
Status: 'created'

- Searches for the legal entity change

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

Or

1. Go to REACH-IT Menu
2. Search and finalise a legal entity change
3. Finalise the legal entity change



2

1

Tasks (1)

Substances

Messages

Or



1

3

Finalise the legal entity change

2

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 doc
5. Provide a contact
6. Continue to additional details

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

Token: *? 11111111111112 1

Validate 2

Legal entity change type: Only representative change

List of assets: Download 3

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



Please note that legal entity changes do not have an expiration date. The transfer can be finalised by the successor any time.

However, successors are recommended to complete this page of the wizard as soon as the token has been received in order to have time to review and validate the token sent by the initiator.

Successors can only have one legal entity change in progress at a time.

Step 4
Status: 'created'

- Review billing information
 - Review company size
1. Assign a contact for transferred assets.
 2. Continue to confirmation page

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

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.

Assign 1 **Continue to confirmation >** 2



Stop!

Once the legal entity change is accepted, **the process cannot be reverted**.

Complete this step only once the UK legal entity does not need to be covered by a REACH registration.

Please do not use the 'request legal entity change update' functionality close to the end of the transitional period. Doing so will send back the legal entity change to the initiator.

UK accounts will not have access to REACH-IT after 31 December and **the transfer will be blocked**.

Transferring registration to an account that already has a registration for the same substance will result in annulment of the newly transferred registration.

Step 5
Status: 'created'

1. Accept the legal entity change

Complete this step once the UK legal entity does not need to be covered by a REACH registration

- If you need to request an update, do it well before 31 December 2020

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?

1

If yes, please accept the legal entity change

If not, you may edit the information of any step, or [Request legal entity change update](#).

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