

## REACH Only Representative (OR)



**CIRS**  
CHEMICAL INSPECTION  
& REGULATION SERVICE

**‘The OR provides a stepping stone into an otherwise inaccessible market for non EU companies’**

All companies manufacturing or placing a substance on the EU market in quantities greater than 1t/year must register the substance with the European Chemicals Agency (ECHA). As only companies with a legal entity in Europe are allowed to submit a registration non-EU companies may appointing an EU-based Only Representative to register on their behalf, in which case their importers will be regarded as downstream users and do not need to do registrations.



### Benefits of Appointing REACH Only Representative (OR)

- Relieve importers of their obligations to register and obtain continued market access in the EU
- Avoid dependence on a single importer and keep market access should one EU importer cease trading;
- Gain advantages over other non-EU suppliers who do not appoint OR to register their substances;

Importers whose suppliers have registered are REACH exempt, however, they need to confirm with their suppliers' OR that they are included in the inventory of importers and their tonnage/ uses are covered by the OR. Ask for REACH Certificate of Compliance from the OR of your suppliers before you put chemicals on the EU market.

### What are REACH Only Representative requirements?

- Must be a legal entity based within Europe
- have the ability/expertise to understand and implement the responsibilities of an importer that only representatives take on under the provisions of REACH (pre-registration, registration, authorization, etc);
- be capable of keeping an up-to-date list of EU importers within the same supply chain of the non-EU manufacturer it represents;
- have a record-keeping system with data on imported quantities and all uses covered;
- be capable of keeping the latest information on the supply of safety data sheets

### Can I Change REACH Only Representative?

Yes, if you are unsatisfied or wish to transfer OR if you may. Non-EU companies have a right to change only representative if they are unsatisfied. If the non-EU manufacturer nominates a new only representative the newly appointed OR can benefit from the pre-registration done by the previous representative if ECHA is informed about the change.

### What does REACH Only Representative do?

- Maintain pre-registration data(company identity, annual tonnage, etc ) submitted to ECHA through REACH-IT;
- SIEF/Consortium representation and participation
- Supply Safety Data Sheets along the supply chain and keep information on the supply of latest SDS updates
- Communicate with EU importers and regulatory authorities and issue necessary documents to ensure REACH compliance;
- Update inventory of importers list and the tonnage covered for each of these importers (10 years) and provide it to enforcement authorities upon request;
- Submit Registration, notification and authorization of substances

### Why Choose OR with CIRS

We are the largest REACH Only Representative and have represented over 2,400 non-EU companies worldwide. If you are looking for a cost-effective REACH only representative or wish to change only representative, please don't hesitate to contact us for further advice

Contact [morgan@cir-reach.com](mailto:morgan@cir-reach.com)