REACH Only Representative (OR)

‘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

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

Can I Change REACH Only Representative?

Yes, if you are unsatisfied or wish to transfer OR you may. Non-EU companies have a right to change only representative if they are unsatisfied. If the non-EU manufacturer nomimates 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.

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