

REACH-IT Industry User Manual

Part 17 - Legal Entity Change



Document history

Version	Changes
1.0	First published version

Reference: ECHA-10-B-16-EN

ISBN-13: 978-92-9217-270-1

ISSN: 1831-7782

Issue date: 25/03/2010

Language: English

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1 Introduction

This **Part 17 - Legal Entity Change** of the Industry User Manual (IUM) explains and describes the use of those functionalities required by industry to comply with REACH when a company changes its legal personality.

This manual is split into two main parts. Chapter 2 explains the context for legal entity change in REACH-IT. Chapter 3 is a step-by-step set of instructions for using the legal entity change functionality in REACH-IT.

Prior to using this Part 17, it is strongly recommended that the user reads Part 1 – Getting started with REACH-IT, where the following topics are discussed in more detail:

- Structure of this IUM.
- Conventions used, in terms of icons, text, buttons, links, etc.
- Background information on REACH-IT and its link to the IUCLID 5 website and application.

2 General concepts of legal entity change

The purpose of this chapter is to provide an overall context for legal entity change. This chapter will:

- Define key terms.
- Summarise the duties of companies with respect to changes of name and changes of legal personality.
- Provide an overview of the legal entity change process in REACH-IT.
- Describe how to apply the legal entity change functionality in REACH-IT to the most common business scenarios.
- List the most common rules relating to legal entity change.

The next chapter describes how legal entity change is carried out step-by-step in REACH-IT.

2.1 Definitions

The following table defines the key terms for legal entity change in the context of REACH-IT.

Table 1: Definitions of key terms

Term	Definition
Legal entity change	Object in REACH-IT which defines the parties (originating legal entity and its legal successor) and the content of a change in legal personality.
Legal entity change process	The process of transferring items from the originating legal entity to the legal successor due to a change in legal personality.
Originating legal entity	The legal entity (company) which is in possession of the items before the change of legal personality.
Legal successor	The legal entity (company) which takes over the possession of the items as a result of the change of legal personality.
Item	General term used to refer to pre-registrations, registrations, notifications and inquiries which can be transferred from the originating legal entity to the legal successor in the legal entity change process. Each item has as a unique identifier a reference number.
Item list	List defining which items will be transferred from the originating legal entity to the legal successor. The item list is created during the creation of the legal entity change in REACH-IT.

2.2 Duties of companies

Duties of companies will vary depending on whether they:

- Change their name
- Change their legal personality

In general, these duties will apply to all companies that are pre-registrants, registrants, PPORD notifiers, CLP notifiers and/or inquirers.

The purpose of this manual is to explain what actions companies need to carry out in REACH-IT once they have determined which of the above listed cases applies to their particular situation.

For guidance on determining what duties apply to a company in specific business and legal contexts, industry is advised to consult the Fact sheet on change of legal personality and name change.

2.2.1 Change of name

ECHA considers that there is a change of name in situations where a pre-registrant, registrant, PPORD notifier or inquirer changes its name without changing its legal personality (see further below). This can for example occur as a result of the share purchase of a legal person.

REACH-IT has a “name change functionality”. It enables companies to make name changes. This functionality should not be used for indicating changes of legal personality.

Actions required:

- The legal entity changing its name will need to indicate this in REACH-IT providing evidence of the name change (for example, an extract from the commercial register) and needs to declare that the change of name is not due to a change of legal personality.
- No fee is charged to registrants who update their registration due to change of name.

2.2.2 Change of legal personality

ECHA considers that there is a change of legal personality in the situations set out below.

2.2.2.1 Merger or company split

The originating legal entity that has submitted information to ECHA ceases to own a pre-registration, registration, PPORD or inquiry due to either a merger or a company split.

Actions required:

- The originating legal entity and the legal successor(s) must complete the legal entity change(s) in REACH-IT to reflect the change(s) and provide evidence of the change(s) in legal personality. Please note that a registration cannot be shared between different legal entities.
- A fee must be paid by the legal successor(s) pursuant to Article 5(1)(c) of the Fee Regulation for changes in legal personality. The fee payable depends on the size of the legal successor after the change in legal personality.

2.2.2.2 Sale of assets

A sale of assets (for example, a plant used for manufacturing a substance) from one company to another is considered to be a change of legal personality where the owner of the assets also agrees to transfer his registration to the new owner of the assets.

Actions required:

- In case he has not already submitted a registration, pre-registration, PPORD notification or inquiry for the substance linked to the assets need together with the seller of the assets complete the legal entity change(s) in REACH-IT to reflect the change(s) and provide evidence of the sale of assets. Please note that a registration cannot be shared between different legal entities.
- A fee must be paid by the new owner pursuant to Article 5(1)(c) of the Fee Regulation. The fee payable depends on the size of the owner after the change in legal personality.

In particular, the previous owner of the assets may need to update his registration of the substance(s) linked to the assets as a result of their sale (e.g. if manufacture volumes are impacted).

2.2.2.3 Change of only representative

When the only representative of a non-EU manufacturer changes the following applies:

Actions required:

- The new only representative will need to submit evidence that it has been appointed by the non-EU manufacturer as an only representative and that the previous only representative has agreed to this change.
- A fee must be paid by the new only representative pursuant to Article 5(1)(c) of the Fee Regulation for changes in legal personality. The update fee payable by the only representative depends on the size of the non-EU manufacturer it represents.

2.3 Legal entity change process overview

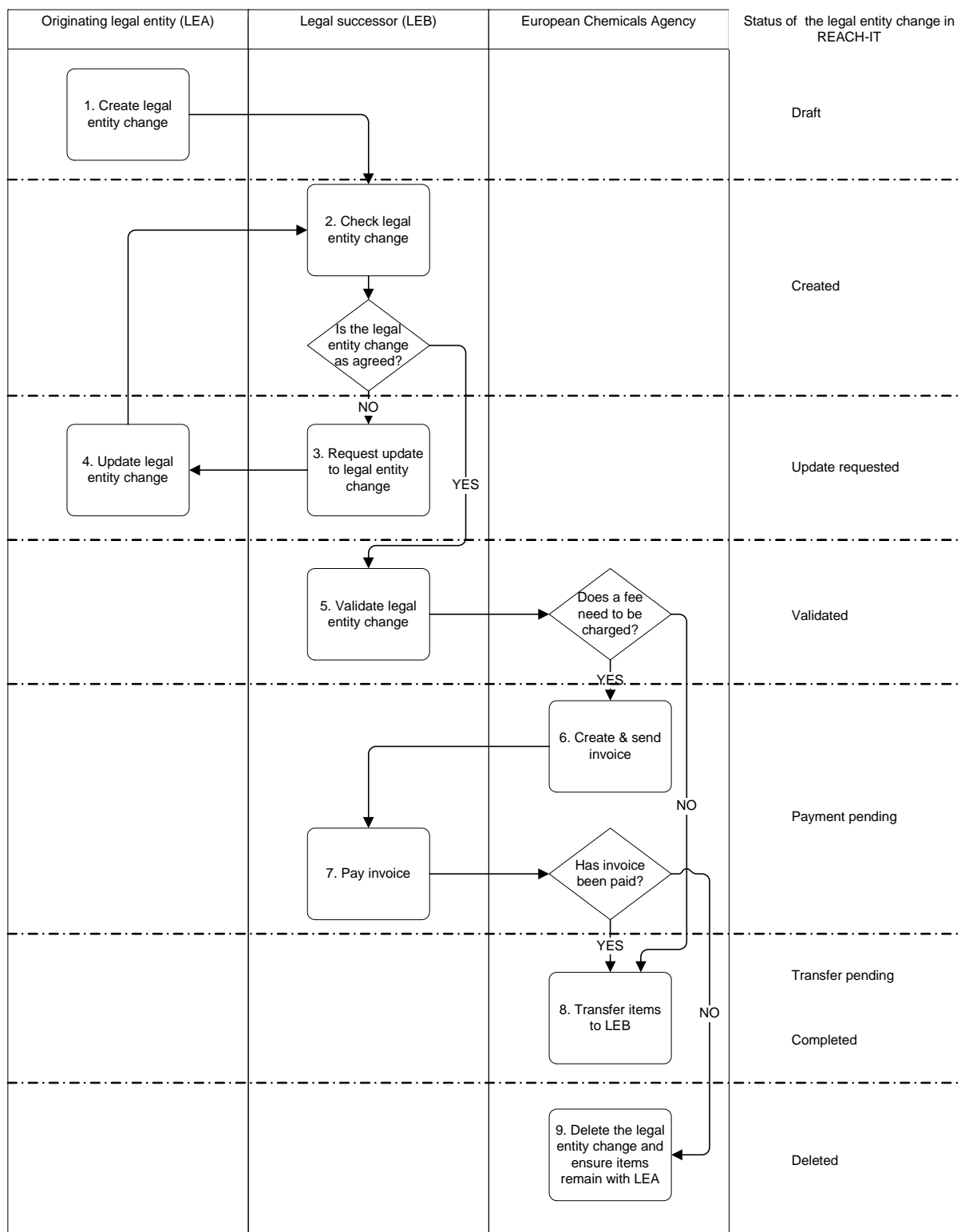
Where an originating legal entity (LEA) is succeeded by a legal successor (LEB) as a result of a merger, split or only representative change, REACH-IT will allow LEA to transfer pre-registrations, registrations, notifications and inquiries to its legal successor LEB.

The standard steps that will need to be completed in REACH-IT to record a legal entity change are as follows:

- LEA creates a legal entity change in REACH-IT. LEA communicates to LEB outside of REACH-IT (e.g. via e-mail) that the legal entity change is ready for review.
- LEB reviews the legal entity change.
- [IF NEEDED] LEB requests LEA to make updates to the legal entity change. In particular, LEB will want to verify that the item list contains all the required pre-registrations, registrations, notifications and inquiries.
- [IF NEEDED] LEA updates the legal entity change as requested by LEB.
- Once LEB is satisfied with the contents of the legal entity change, LEB validates it.
- [IF NEEDED] An invoice for the legal entity change will be created and sent to LEB by the Agency. See chapter 2.5.8 for more details on whether an invoice is issued or not.
- [IF NEEDED] LEB pays the invoice.
- All the defined and validated items (pre-registrations, registrations, notifications and inquiries) are transferred from LEA to LEB in REACH-IT.
- [IF NEEDED] If LEB does not pay for the legal entity change within the extended due date, the legal entity change is deleted from REACH-IT and the items are not transferred.

The above steps are depicted in the below graphic with each column representing the tasks of the three actors involved: LEA, LEB and ECHA. In addition, the graphic shows the corresponding status that the legal entity change has in REACH-IT during the process from start to completion.

Figure 1: Legal entity change process and corresponding status in REACH-IT



2.4 Business scenarios

Depending on the business context of the legal entity change, one or more legal entity changes will need to be created in REACH-IT to transfer all the needed items from an originating legal entity to its legal successor(s).

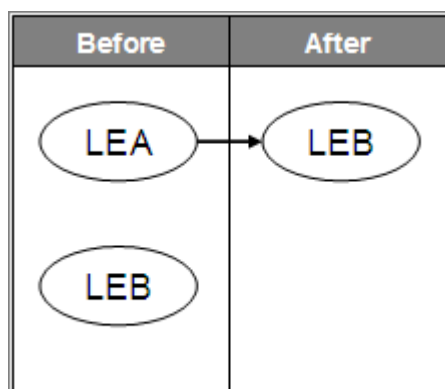
The main business scenarios are described below. For a correct interpretation of the diagrams, please note the following:

- The legal entities in the “Before” column depict the companies before the change in legal personality.
- The legal entities in the “After” column represent the companies after the change in legal personality.
- The arrows represent the legal entity change(s) done in REACH-IT between the depicted companies.

Furthermore, note that these scenarios only describe the simplest form of the various possible types of change in legal personality. The hypothetical cases portrayed only involve a minimum number of legal entities. Real cases can be more multifaceted involving many legal entities and a number of consecutive (or “chained”) changes in legal personality. However, the same principles would apply in more complex scenarios. For example, an existing company could split into more than two new companies or a company may undergo a spin-off which is then consecutively merged with an existing company.

2.4.1 Merger – Absorption (or acquisition)

Figure 2: Merger – Absorption (or acquisition)

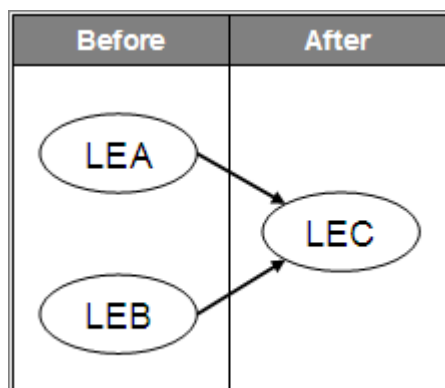


LEA is absorbed (or acquired) by LEB and LEA ceases to exist.

One legal entity change in REACH-IT is required to transfer LEA's pre-registrations, registrations, notifications and inquiries to LEB. As such, the item list for this transaction is created automatically by REACH-IT and will include all LEA's items by default.

2.4.2 Merger – Joining of equals

Figure 3: Merger – Joining of equals

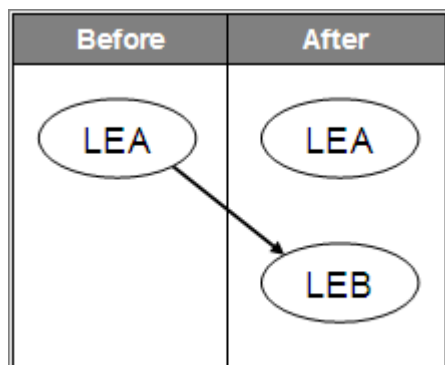


LEA and LEB merge as equals to create a new legal entity LEC. Both LEA and LEB cease to exist.

Two legal entity changes in REACH-IT are required to transfer LEA's and LEB's pre-registrations, registrations, notifications and inquiries respectively to LEC. Both item lists for these transactions are created automatically by REACH-IT and will include all LEA's and LEB's items respectively by default.

2.4.3 Split – Spin-off

Figure 4: Split – Spin-off

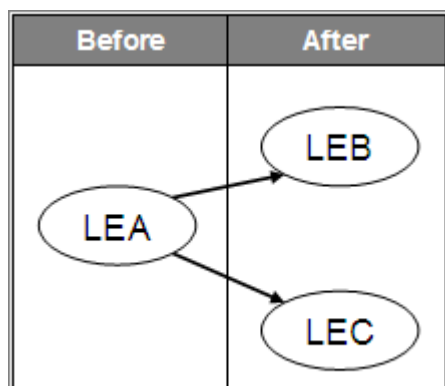


LEB spins-off (splits) from LEA to become a new legal entity. LEA continues to exist.

One legal entity change in REACH-IT is required to transfer LEA's pre-registrations, registrations, notifications and inquiries to LEB. The item list for this transaction is created manually or semi-automatically via bulk upload by LEA and may include all or a subset of LEA's items.

2.4.4 Split – De-merger

Figure 5: Split – De-merger



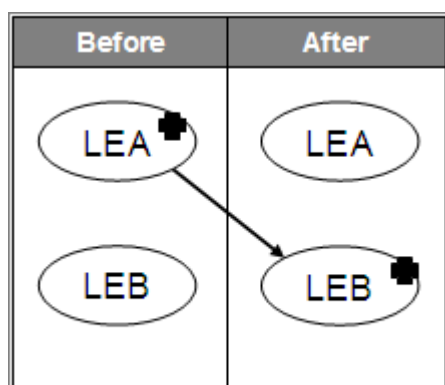
LEA splits into two new legal entities LEB and LEC. LEA ceases to exist.

Two legal entity changes in REACH-IT are required to transfer LEA's pre-registrations, registrations, notifications and inquiries to LEB and LEC respectively. Both item lists for these transactions are created manually or semi-automatically via bulk upload by LEA. In sum these lists will include all or a subset of LEA's items.

Any particular pre-registration, registration, notification or inquiry can only be transferred to one legal successor. Furthermore, these items cannot be shared nor divided between legal successors. Should both legal successors require, for example, a registration for the same substance, one of the legal successors will need to submit a new registration.

2.4.5 Asset transfer

Figure 6: Access to legal entity change functionality



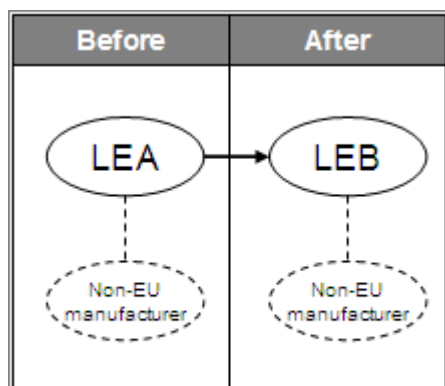
LEA sells an asset (e.g. production plant) to LEB.

One legal entity change in REACH-IT is required to transfer LEA's pre-registrations, registrations, notifications and inquiries related to the asset transferred to LEB. The item list for this transaction is created manually or semi-automatically via bulk upload by LEA and may include all or a subset of LEA's items.

NOTE: Legal entity change as a result of an asset transfer is handled as a split type of legal entity change in REACH-IT.

2.4.6 Only Representative change

Figure 7: Access to legal entity change functionality



Although an only representative change is not a legal entity change strictly speaking, the legal entity change functionality in REACH-IT will be used to record only representative changes as well.

When the only representative of a non-EU manufacturer changes from LEA to LEB, the agreed pre-registrations, registrations, notifications and inquiries are transferred from LEA to LEB via a legal entity change.

In addition, evidence that all three parties (LEA, LEB and the non EU manufacturer) are in agreement with respect to the change will be required.

2.5 Specific functionality encoded for legal entity change in REACH-IT

This chapter describes specific functionality that has been encoded into REACH-IT for legal entity change.

2.5.1 Indivisibility of items

An item is owned by one and only one legal entity at any given time. REACH-IT will not allow items to be split nor shared between two or more legal entities.

2.5.2 Reference numbers and submission numbers

The reference number is the item's unique identifier. Items are transferred to the legal successor with the original reference number. REACH-IT will not issue a new reference number for an item in the legal entity change process. Rather the owner of the reference number will be updated to reflect the change in legal personality.

However, the legal successor will be issued a new submission number connected to the reference number as a result of the legal entity change. The legal successor will use this new submission number when submitting an update.

2.5.3 The principle of one registration per substance per company

The principle of one registration per substance per company is upheld.

For legal entity change, this means that an originating legal entity cannot transfer to its legal successor an item (for example a registration) for a substance for which the successor already has a corresponding item. Such items will be marked as annulled by REACH-IT.

In those special cases where the originating legal entity has registered his substance for a higher tonnage band than the legal successor, REACH-IT will keep track of the legal successor's right to this higher tonnage band. However, to be legally on the market at this higher tonnage band acquired from the originating legal entity, the legal successor will need to submit a spontaneous update to this effect pursuant to REACH Article 22. REACH-IT will know not to invoice the legal successor for this update of tonnage band.

2.5.4 Consecutive legal entity changes

Consecutive (or "chained") legal entity changes are allowed for:

- **Items.** The number of times an item can be transferred from one legal entity to another due to changes in legal personality is unlimited.
- **Legal entities.** A particular legal entity can be the subject of a number of consecutive legal personality changes. For example, legal entity A may spin-off legal entity B and later legal entity B merges with legal entity C.

2.5.5 Joint submissions

A legal entity's role in a joint submission is transferred to its legal successor together with the respective registration(s). Both lead and member roles are transferred. If a company does not want to transfer its role as a joint submission lead to its legal successor, the company must first relieve itself of this lead role before it completes the legal entity change.

2.5.6 Third party representatives

The legal successor may indicate a third party representative during the creation of the legal entity change. This third party representative will be reflected in the (pre-)SIEFs of the respective (pre-)registrations that are transferred from the originating legal entity.

2.5.7 Security tokens

REACH-IT implements a concept of security token which is to be used by the originating legal entity and the legal successor to confirm the legal entity change. In practice, when the originating legal entity creates the legal entity change, REACH-IT will automatically generate a related security token. The originating legal entity will then share the security token with the legal successor outside of REACH-IT (for example, via e-mail). The legal successor will subsequently confirm the validity of the legal entity change by using this token in REACH-IT.

2.5.8 Invoicing

The Agency will issue an invoice for the legal entity change pursuant to Commission Regulation (EC) No 340/2008 Article 5(1)(c) (Fee regulation) if the item list contains one or more payable items.

The following are payable items which, if included in a legal entity change, will trigger a fee to be invoiced:

- Registration
- Registration of on-site isolated intermediate
- Registration of transported isolated intermediate

The following are items which, if included in a legal entity change, will not trigger a fee:

- Pre-registration
- Product and Process Oriented Research and Development (PPORD) notification
- Classification and Labelling (C&L) notification

- Inquiry notification

Where an invoice is needed (i.e. the legal entity change includes at least one payable item), only one invoice will be issued per legal entity change.

Invoices are issued to the legal successor. The company size of the legal successor after the change in legal personality will be a determining parameter for the invoiced amount. Pursuant to Commission Regulation (EC) No 340/2008 Annex III Table 3, a reduced fee will be invoiced to SMEs.

Only once the invoice is paid in full, will the transfer of items take place and the legal entity change be completed in REACH-IT. If the invoice is not paid within the extended due date the legal entity change is deleted from the system and items will not be transferred.

2.5.9 Exceptions

An item cannot be included in a legal entity change if:

- The item is included in another legal entity change which is not completed yet.
- The item is in the process of being updated by the originating legal entity via an update submission.

A merge type of legal entity change process cannot be initiated so long as an update to an item of the originating legal entity is in process.

The transfer of an item in a legal entity change cannot be carried out by REACH-IT if a corresponding item is being updated by the legal successor. For example, if the legal successor is in possession of a registration for a substance that he is in the process of updating, a registration for the same substance from the originating legal entity cannot be processed to record the highest tonnage band entitlement.

2.5.10 Business rules

With regards to submissions, the following business rules will be applied:

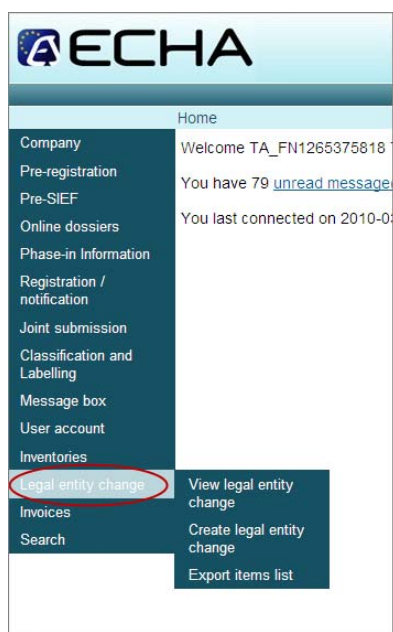
- The submission of an update to an item that is included in a legal entity change will not be accepted until the legal entity change has been completed.
- The submission of a new item from a company that is the originating legal entity in a merge type legal entity change process will not be accepted as this company will cease to exist by definition.

3 Step-by-step instructions

3.1 Legal entity change menu items

Access to legal entity change functionality is located on the main menu of REACH-IT.

Figure 8: Access to legal entity change functionality



The sub-menus of <Legal entity change> are:

<View legal entity change> allows you to view, edit and delete existing legal entity changes.

<Create legal entity change> allows you to create new legal entity changes or continue creating already started ones.

<Export item list> allows you to define a list of your items and export that list in CSV format.



Access to legal entity change functionality is only available to users with **Company Manager** role.

3.2 Create legal entity change

The legal entity change process is initiated via the creation of a legal entity change. This is done by the originating legal entity.

- ⚠ The legal successor must have completed the party sign-up process in REACH-IT to have a valid company UUID. This company UUID must be shared with the originating legal entity outside of the system (e.g. via e-mail).
- ⚠ Before starting the creation of the legal entity change, the originating legal entity is advised to have at hand the following required inputs:

UUID of the legal successor

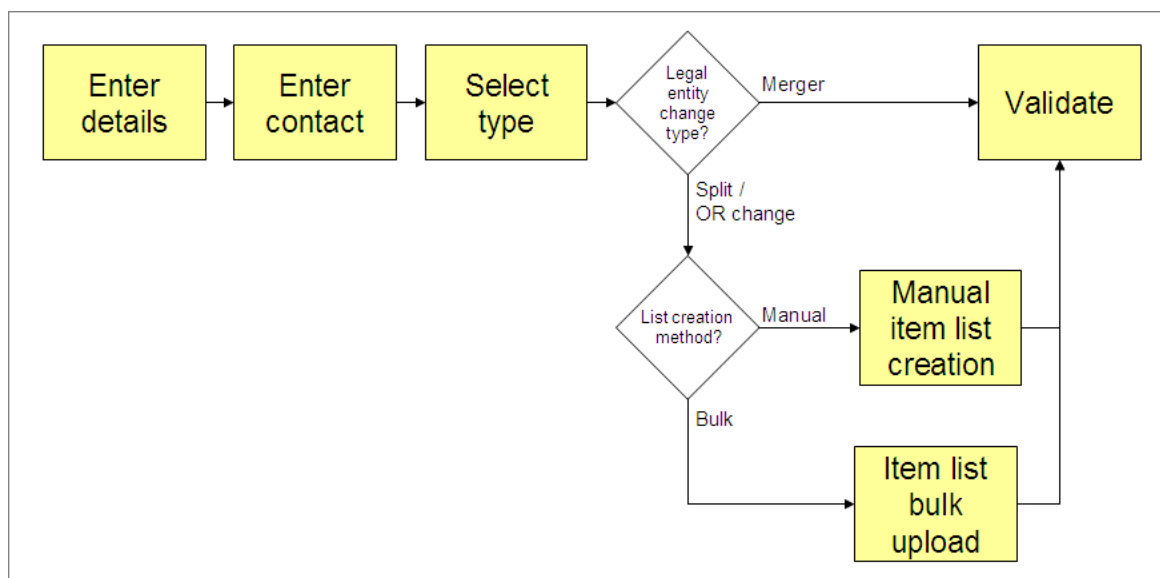
Evidence of the change of legal personality (for example, an extract from a trade registry confirming the change of legal personality) in PDF format

List of items to be transferred to the legal successor

3.2.1 Create a new legal entity change

The legal entity change creation wizard will guide the user through the steps (or tabs) to create a new legal entity change. Figure 9 below describes the main steps for creating a new legal entity change. These steps are described in detail in the subsequent chapters.

Figure 9: Legal entity change creations steps

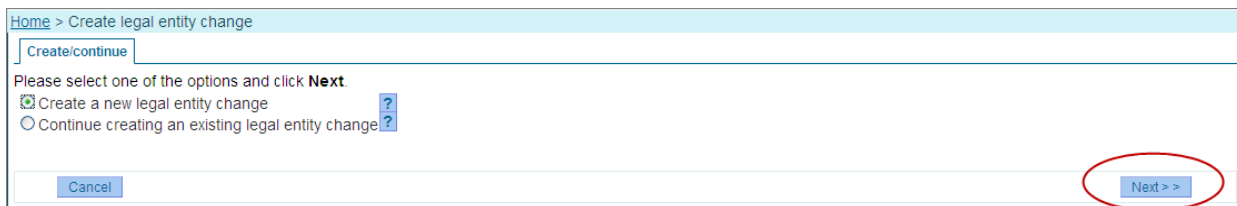


3.2.1.1 Details

From the Company homepage, click on the <Legal entity change \ Create legal entity change> menu item.

Select <Create a new legal entity change> to create a new legal entity change. Click <Next>.

Figure 10: Create a new legal entity change



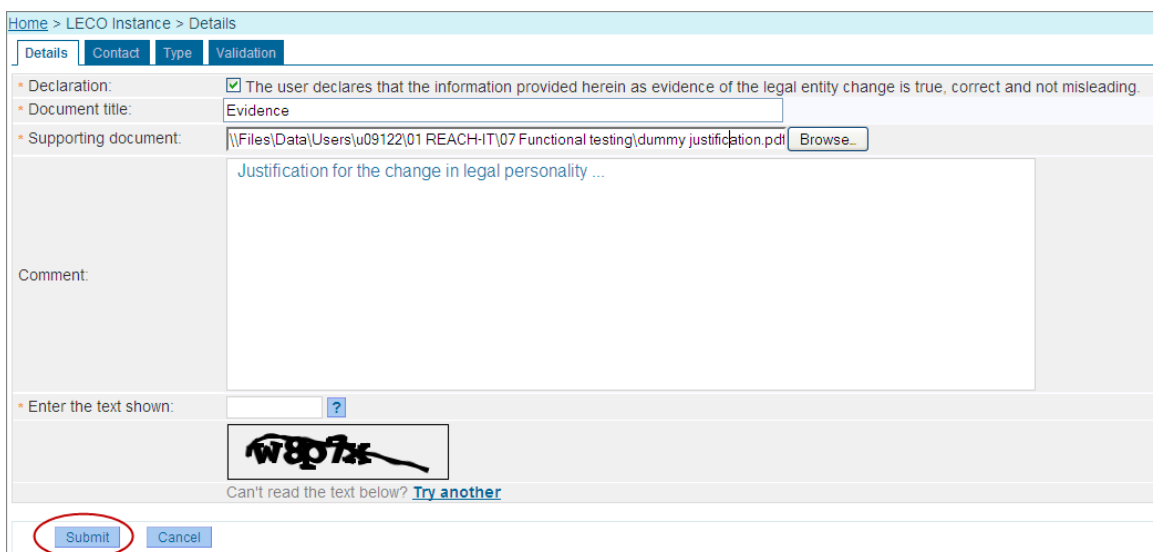
On the <Details> tab enter the required information (fields marked with an asterisk * are mandatory).

Figure 11: Details tab






To add evidence of the change in legal personality, click the <Add attachment> button. You will be directed to the following screen.

Figure 12: Evidence for legal entity change



Enter all the required information. Use the <Browse> button to locate the document you need to upload in your file system. Click <Submit>.

-  Remember to tick the declaration confirming the evidence you provide is true, correct and not misleading.
-  The document(s) to be attached must be in PDF format.
-  You may attach up to five documents.

The document(s) you have attached to the legal entity change are displayed on the <Details> tab. Click the delete symbol if you wish to remove an attachment from the legal entity change.

Figure 13: Adding or deleting evidence for legal entity change



Home > LECO Instance > Details

Details | Contact | Type | Validation

Please give your legal entity change a unique name, enter the UUID of the legal successor as well as attach documentary evidence of the legal entity change (in PDF format only). Fields marked with an asterisk (*) are mandatory. Hovering over a (?) sign displays help information.

Legal entity change details

* Legal entity change name: DEMO 01

Originating legal entity UUID: ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca

Originating legal entity name: LEA

* Legal successor UUID: ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390

Legal successor name:

* Attachments ? [Add attachment](#) Add more attachments by clicking here

Delete an attachment by clicking here

Document title	Attachment	Comment	Delete
Evidence	dummy_justification.pdf	Justification for the change in legal personality ...	

[Cancel](#) Next >

Click <Next> to proceed.

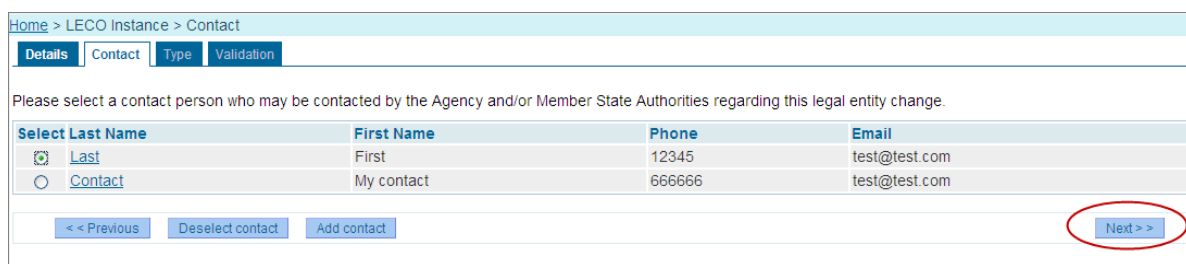
REACH-IT will direct you to the <Contact> tab.

If the creation of the legal entity change is interrupted at any time from this point onwards, the creation process may be resumed. See chapter 3.2.2 for detailed instructions.

3.2.1.2 Contact

On the <Contact> tab, select the contact person who may be contacted by the Agency and/or Member State Authorities regarding this legal entity change from the list of existing contacts.

Figure 14: Contact for legal entity change



Home > LECO Instance > Contact

Details | Contact | Type | Validation

Please select a contact person who may be contacted by the Agency and/or Member State Authorities regarding this legal entity change.

Select	Last Name	First Name	Phone	Email
<input checked="" type="radio"/>	Last	First	12345	test@test.com
<input type="radio"/>	Contact	My contact	666666	test@test.com

[<< Previous](#) [Deselect contact](#) [Add contact](#) Next >

Use the <Add contact> button to add a new contact to the list.

Use the <Deselect contact> button to deselect an already selected contact.

Click <Next> to proceed.

REACH-IT will direct you to the <Type> tab.

3.2.1.3 Type

On the <Type> tab, select the type of legal entity change.

- ✖ In the case you select <Merge> all items (registrations and notifications) will be transferred from the originating legal entity to the legal successor by default. The system will automatically create the item list.

If <Split> or <Only representative change> is selected, the user will need to select how the item list will be created.

Select <Manual selection of items in REACH-IT> to create your list of items on-line in REACH-IT.

- ! If you have a relatively short item list you may want to create it on-line.

Select <Bulk upload of identified items> to upload a list of items you have prepared in advance off-line outside of REACH-IT.

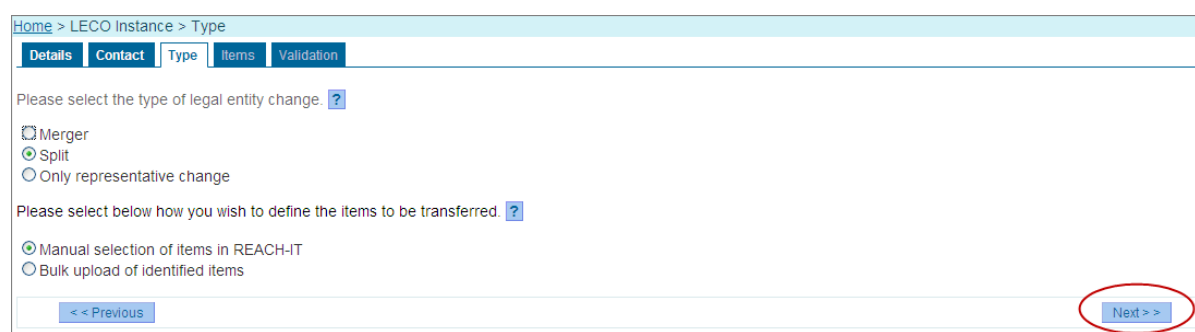
- ! If you have a relatively long item list you might want to create it off-line, save it in CSV format and then upload into REACH-IT.

You may export a list of all your items in REACH-IT via the following menu path <Legal entity change \ Export items list>. You may then edit this list to include the items you wish to transfer to your legal successor.

Alternatively you could create a CSV format list from an external source, for example an ERP system you might be using to manage your registrations and notifications.

See chapter 3.7 for more details on exporting your items and the CSV format.

Figure 15: Type of legal entity change and list creation method



Home > LECO Instance > Type

Details Contact Type Items Validation

Please select the type of legal entity change. ?

☐ Merge

☒ Split

☐ Only representative change

Please select below how you wish to define the items to be transferred. ?

☒ Manual selection of items in REACH-IT

☐ Bulk upload of identified items

<< Previous

Next >>

Click <Next> to proceed.

Depending on the type of legal entity and your choice of how to create the item list, the system will direct you to the correct tab. Depending on your selection(s), refer to the following chapters to continue:

<Merge> proceed to chapter 3.2.1.6.

<Split> or <Only Representative change> and < Manual selection of items in REACH-IT> proceed to chapter 3.2.1.4.

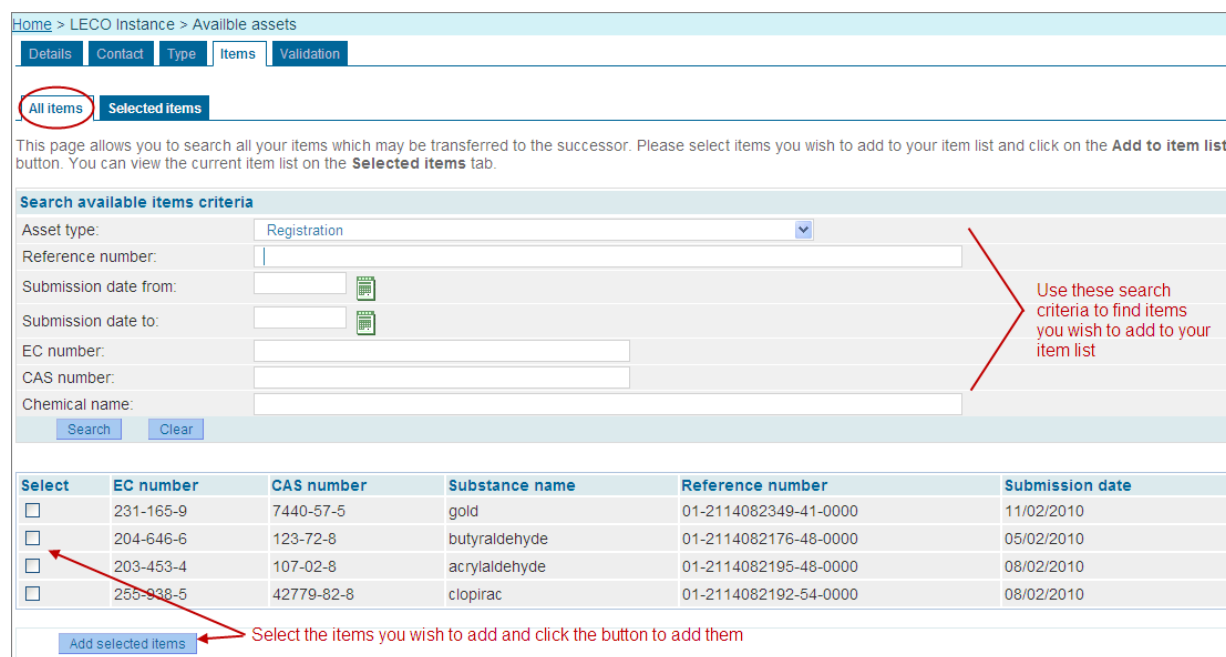
<Split> or <Only Representative change> and <Bulk upload of identified items> proceed to chapter 3.2.1.5.

3.2.1.4 Items (manual creation)

On the <Items> tab, you are presented with two sub-tabs.

Use the <All items> sub-tab to search for all items you can currently transfer.

Figure 16: Search all items



Home > LECO Instance > Available assets

Details Contact Type **Items** Validation

All items Selected items

This page allows you to search all your items which may be transferred to the successor. Please select items you wish to add to your item list and click on the **Add to item list** button. You can view the current item list on the **Selected items** tab.

Search available items criteria

Asset type: Registration

Reference number:

Submission date from:

Submission date to:

EC number:

CAS number:

Chemical name:

Search Clear

Use these search criteria to find items you wish to add to your item list

Select	EC number	CAS number	Substance name	Reference number	Submission date
<input type="checkbox"/>	231-165-9	7440-57-5	gold	01-2114082349-41-0000	11/02/2010
<input type="checkbox"/>	204-646-6	123-72-8	butyraldehyde	01-2114082176-48-0000	05/02/2010
<input type="checkbox"/>	203-453-4	107-02-8	acrylaldehyde	01-2114082195-48-0000	08/02/2010
<input type="checkbox"/>	255-938-5	42779-82-8	clopirac	01-2114082192-54-0000	08/02/2010

Add selected items Select the items you wish to add and click the button to add them



Registrations for which an update has been submitted and the submission is still in progress will not be displayed as these cannot be transferred. The ongoing update submission must first be completed.

To add items to the list of items you wish to transfer, select the items you wish to transfer and click <Add selected items>.

Use the <Selected items> sub-tab to search for all items you have selected to be added to the item list. The counter indicates how many items are currently on your list.

Figure 17: View selected items

Home > LECO Instance > Selected assets

Details **Contact** **Type** **Items** **Validation**

All items **Selected items**


This page allows you to search and view all items you have added to the item list to be transferred to the successor. To remove items, please select the item(s) and click on the **Remove items** button.


Your list currently contains 2 item(s) ← Counter indicating how many items have been selected to item list

Search selected items criteria

Item type:

Reference Number:

Submission date from: 


Submission date to: 

EC Number:

CAS Number:

Chemical Name:

Select	Item type	EC Number	CAS Number	Substance name	Reference number	Submission Date
<input type="checkbox"/>	Registration	204-646-6	123-72-8	butyraldehyde	01-2114082176-48-0000	05/02/2010
<input type="checkbox"/>	Registration	231-165-9	7440-57-5	gold	01-2114082349-41-0000	11/02/2010

 Note that depending on the search criteria you have defined, not all items are displayed at the same time.

To delete items from the item list, on the <Selected items> sub-tab select the items to be removed and click <Remove items>.

Click <Next> to proceed.

REACH-IT will direct you to the <Validation> tab. Go to chapter 3.2.1.6.

3.2.1.5 Items (bulk upload)

On the <Items> tab, click <Browse>



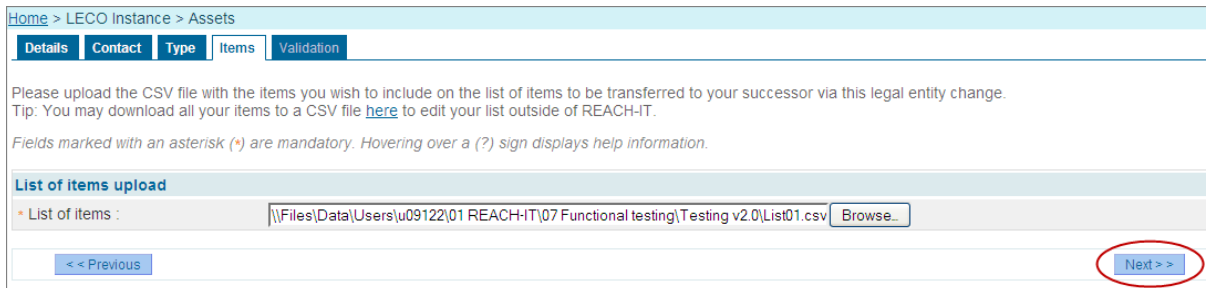
You must prepare your item list in CSV format in advance.



Please refer to chapter 3.7 for instructions on how to export a list of all your existing items in CSV format.

Locate the CSV file you wish to upload in your file system, select the file and click <Open> to add the file.

Figure 18: CSV upload



Click <Next> to proceed.

REACH-IT will direct you to the <Validation> tab.

3.2.1.6 Validation

The <Validation> tab provides an overview of all the entries you have made on the previous tabs of the legal entity change creation wizard.

Review all your data and navigate back to the relevant tab should you wish to change any of your entries.

Once you are satisfied with your entries, click <Create legal entity change> button.



The automatic creation of the item list (and respective download link) in the case of a merger may take a while.

Figure 19: Legal entity change validation

Home > LECO Instance > Validation

Details | **Contact** | **Type** | **Items** | **Validation**

[Details](#) [Contact](#)

Legal entity change details

Legal entity change name:	DEMO 01
Legal entity change type :	Split (Manual selection of items in REACH-IT)
Originating legal entity :	ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca
The UUID of the new legal entity:	ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390
Item list:	Download ← Link to view/download the item list

Attachments

Document title	Attachment	Comment
Evidence	dummy justification pdf ← Link to view/download evidence	Justification for the change in legal personality ...

Contact person

Contact information

Title:	
First Name:	First
Last Name:	Last
Phone:	12345
Fax:	
E-mail:	test@test.com

Organisation

Organisation Name:	
Department:	

Address

Street:	MyStreet
Street 2:	
Postal code:	00100
City / Town:	Helsinki
Region / County:	
Country:	FI
Postal address:	

[Create legal entity change](#) [Cancel](#)

REACH-IT will confirm the creation of the legal entity change and provide a security token which you must make note of. This confirmation will be in the form of a confirmation screen as well as an internal message.

Figure 20: Legal entity change creation confirmation

Home > LECO Instance > Success

Your legal entity change has been successfully initiated in REACH-IT. In order to proceed you must provide the legal entity change name and token to the legal successor for him to be able to validate the contents of the legal entity change.

Legal entity change name: DEMO 01
Token: 1267601907222

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 items to the legal successor.

[OK](#)



The originating legal entity must share the security token with the legal successor for the legal successor to be able to validate the legal entity change in REACH-IT.

The originating legal entity must share with the legal successor the following outside of REACH-IT (e.g. via email):

Legal entity change name

Token

Using this information, the legal successor will validate the legal entity change in REACH-IT to confirm that he truly is the legal successor and that the item list is as agreed.



If you need to access the token later, you may do so via the internal message that you have received confirming your creation of the legal entity change.



The token does not have an expiry date. It will remain valid until used by the legal successor to validate the legal entity change.

3.2.2 Continue creating an existing legal entity change

If the creation of a legal entity change is interrupted, it will be saved in draft mode. You may continue the creation of a legal entity change that has been saved in draft mode at a later time. This may be done in either of the two ways described below.

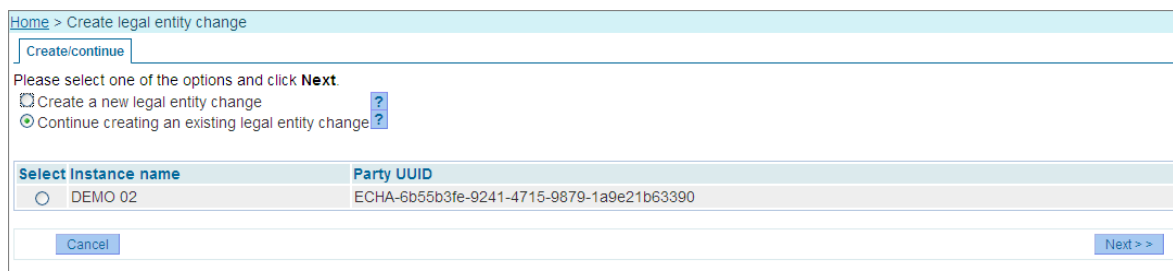
3.2.2.1 From the create menu

From the homepage, click on the <Legal entity change \ Create legal entity change> menu item.

Select <Continue creating an existing legal entity change>.

From the displayed list of existing draft legal entity changes, select the one you wish to continue creating.

Figure 21: Continue creation of draft legal entity change



Select Instance name	Party UUID
<input type="radio"/> DEMO 02	ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390

Click <Next>.

REACH-IT will direct you to the <Contact> tab from where you can continue the creation process described in chapter 3.1.

3.2.2.2 From the view menu

From the homepage, click on the <Legal entity change \ View legal entity change> menu item.

Enter desired search criteria in the search screen. Click <Search>.

From the results screen, select the draft legal entity change you wish to continue creating.

Click <Edit>.

Figure 22: Continue creation of draft legal entity change for view screen



Home > View legal entity change

Search legal entity change

Search criteria

Legal Entity Change Status:

Legal Entity Change Name:

Select Legal Entity Change Name	Party UUID	Status	Item list
 DEMO 02	Originating legal entity : LEA ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca Legal successor: ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390	Draft	

Select legal entity change and click Edit.

REACH-IT will direct you to the <Contact> tab from where you can continue the creation process described in chapter 3.1.

3.3 Validate a legal entity change

Once the legal successor has received from the originating legal entity the name of the legal entity change and the required security token, the legal successor must validate the legal entity change for it to be completed. The purpose of this validation is for the legal successor to check and verify that the content of the legal entity change created by the originating legal entity is as agreed.

- ✖ In particular, the legal successor will want to verify that the content of the item list is as agreed for the correct items to be transferred to him.

If the legal successor is satisfied with the content of the legal entity change, he will validate the legal entity change. See chapter 3.3.1.

If the legal successor is not satisfied with the content of the legal entity change, he will request the originating legal entity to update the legal entity change. See chapter 3.3.2.

3.3.1 Validate a legal entity change

The legal entity change validation wizard will guide the user through the steps (or tabs) to validate a legal entity change. These steps are described in detail in the subsequent chapters.

3.3.1.1 Details

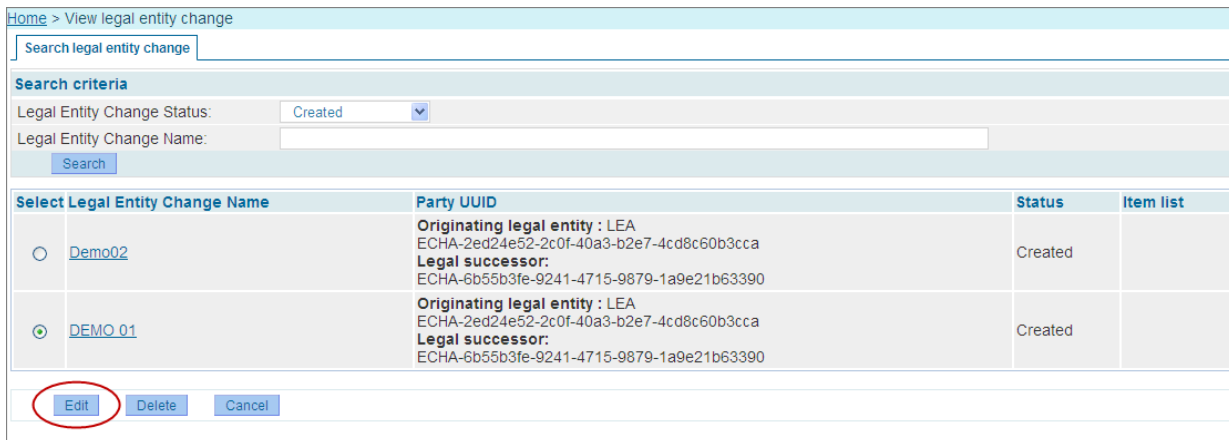
From the homepage, click on the <Legal entity change \ View legal entity change> menu item.

Enter desired search criteria in the search screen. Click <Search>.

From the results screen, select the created legal entity change you wish to validate.

Click <Edit>.

Figure 23: Find legal entity change to be validated



Home > View legal entity change

Search legal entity change

Search criteria

Legal Entity Change Status: Created

Legal Entity Change Name:

Search

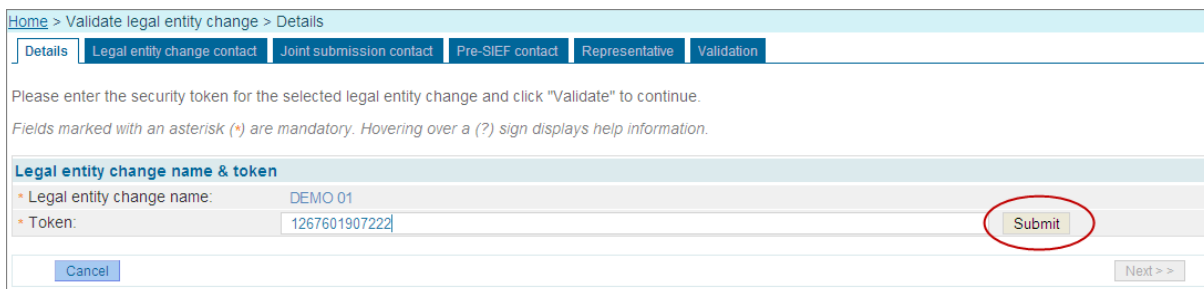
Select Legal Entity Change Name	Party UUID	Status	Item list
<input type="radio"/> Demo02	Originating legal entity : LEA ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca Legal successor: ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390	Created	
<input checked="" type="radio"/> DEMO 01	Originating legal entity : LEA ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca Legal successor: ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390	Created	

Edit Delete Cancel

REACH-IT will direct you to the <Details> tab.

Enter the security token you have received from the originating legal entity. Click <Submit>.

Figure 24: Entering security token for legal entity change



Home > Validate legal entity change > Details

Details Legal entity change contact Joint submission contact Pre-SIEF contact Representative Validation

Please enter the security token for the selected legal entity change and click "Validate" to continue.
Fields marked with an asterisk (*) are mandatory. Hovering over a (?) sign displays help information.

Legal entity change name & token

* Legal entity change name: DEMO 01

* Token: 1267601907222

Submit

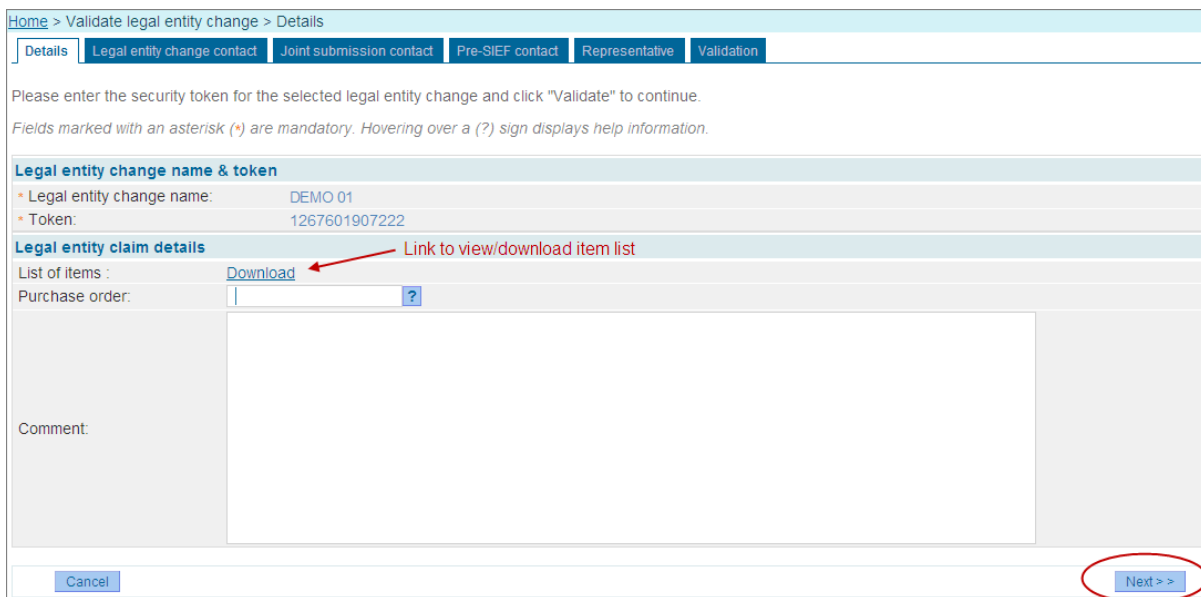
Cancel Next >

- ⚙ Entering the security token is a one time activity. Once successfully entered, the legal successor will not be required to enter the token again even if he interrupts the validation process and comes back to it later.

REACH-IT will now display the legal entity change content for the legal successor to validate as well as update with his information.

On the <Details> tab enter the required information (fields marked with an asterisk * are mandatory).

Figure 25: Details for legal entity change



Home > Validate legal entity change > Details

Details | Legal entity change contact | Joint submission contact | Pre-SIEF contact | Representative | Validation

Please enter the security token for the selected legal entity change and click "Validate" to continue.
Fields marked with an asterisk (*) are mandatory. Hovering over a (?) sign displays help information.

Legal entity change name & token


* Legal entity change name: DEMO 01
* Token: 1267601907222

Legal entity claim details

List of items : [Download](#) Link to view/download item list

Purchase order: ?

Comment:

 You may enter a purchase order number as your own reference for invoicing purposes. This purchase order number will be referenced on the invoice you will potentially receive for the legal entity change.

Click <Next> to proceed.

REACH-IT will direct you to the <Legal entity change contact> tab.

3.3.1.2 Legal entity change contact

On the <Contact> tab, select the contact person who may be contacted by the Agency and/or Member State Authorities regarding this legal entity change from the list of existing contacts.

Figure 26: Contact for legal entity change



Home > Validate legal entity change > Contact

Details | Legal entity change contact | Joint submission contact | Pre-SIEF contact | Representative | Validation

Please select a contact person who may be contacted by the Agency and/or Member State Authorities regarding this legal entity change.

Select	Last Name	First Name	Phone	Email
<input checked="" type="radio"/>	Contact	Contact Contact	6666666	test@test.com
<input type="radio"/>	Blogs	Joe	12345	test@test.com

Use the <Add contact> button to add a new contact to the list.

Use the <Deselect contact> button to deselect an already selected contact.


Click <Next> to proceed.


REACH-IT will direct you to the <Joint submission contact> tab.

3.3.1.3 Joint submission contact

On the <Joint submission contact> tab, select the contact person you wish marked as the contact person for any potential joint submissions that are part of the item list to be transferred.

Figure 27: Joint submission contact



 You may only indicate one joint submission contact. This contact will be updated to all joint submissions transferred to you. If you wish to have different contacts for your joint submissions, you will need to update this change in all the joint submissions after the transfer of items is complete.

Click <Next> to proceed.


REACH-IT will direct you to the <Pre-SIEF contact> tab.

3.3.1.4 Pre-SIEF contact

On the <Pre-SIEF contact> tab, select the contact person you wish marked as the contact person for any pre-SIEFs that will be affected due to any items on the item list to be transferred.

Figure 28: Pre-SIEF contact



 You may only indicate one pre-SIEF contact. This contact will be updated to all the pre-SIEFs transferred to you. If you wish to have different contacts for your pre-SIEFs, you will need to update this change in all the pre-registrations after the transfer of items is complete.

Click <Next> to proceed.

REACH-IT will direct you to the <Representative> tab.

3.3.1.5 Representative

On the <Representative> tab, select the third party representative you wish marked as the third party representative for any pre-SIEFs that will be affected due to any items on the item list to be transferred.

Figure 29: Third party representative contact




Home > Validate legal entity change > Representative

Details Legal entity change contact Joint submission contact Pre-SIEF contact **Representative** Validation

Please select a third party representative. The third party representative defined here will be marked as your third party representative for all items transferred in this legal entity change.

Select Company name	Phone	Fax	Email	UUID
 LEATPR	12345		test@tpr.com	ECHA-0a8a09cc-86f8-48b0-80d4-b377636cb423

< < Previous Deselect contact Add contact **Next >**

 You may only indicate one third party representative. This third party representative will be updated to all pre-registrations transferred to you. If you wish to have different third party representatives for your pre-SIEFs, you will need to update this change in all the pre-registrations after the transfer of items is complete.

Click <Next> to proceed.

REACH-IT will direct you to the <Validation> tab.

3.3.1.6 Validation

The <Validation> tab provides an overview of the content of the legal entity change as well as all the entries you have made on the previous tabs of the legal entity change wizard.

Review all your data and navigate back to the relevant tab should you wish to change any of your entries.

Agree with the declaration by ticking the tick box.

Once you are satisfied with the content and your entries, click <Accept legal entity change> button.

Figure 30: Validate legal entity change

Home > Validate legal entity change > Validation

Details Legal entity change contact Joint submission contact Pre-SIEF contact Representative **Validation**

Details Contact Joint submission contact Contact Representative

Legal entity change details

Agree with the declaration by ticking the box.

* Declaration: ☒ The user declares that the information provided herein as evidence of the legal entity change is true, correct and not misleading.

Legal entity change name: DEMO 01

Legal entity change type : Split (Manual selection of items in REACH-IT)

Originating legal entity : ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca

The UUID of the new legal entity: ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390

Token: 1267601907222

Company Size: Medium

List of items : [Download](#)

Purchase order:

Be sure to have verified the contents of the item list. You can view/download the item list here

Pre-SIEF contact

Contact information

Title:

First Name: Contact Contact

Last Name: Contact

Phone: 6666666

Fax:

E-mail: test@test.com

Organisation

Organisation Name:

Department:

Address

Street: Myadress

Street 2:

Postal code: 009876

City / Town: sdfdsfsd

Region / County:

Country: FI

Postal address:

[Accept legal entity change](#) [Request update to legal entity change](#) [Cancel](#)

Click <OK> on the confirmation screen to complete the validation process.

Figure 31: Validate legal entity change

You are confirming the validation of legal entity change **DEMO 01**. If this is your intention, please click 'OK'.

If you wish to continue viewing/editing the legal entity change, please click 'Cancel'.

[OK](#) [Cancel](#)

REACH-IT will confirm the validation of the legal entity change. This confirmation will be in the form of a confirmation message at the top of the validation screen as well as an internal message.


3.3.2 Request update to a legal entity change


If the legal successor does not agree with the content of the legal entity change created, he can request for an update by the originating legal entity as described below.

Follow the legal entity change validation process as described in chapter 3.3.1 up to the <Validation> tab.

Click <Request update to legal entity change> button.

Click <OK> on the confirmation screen.

 You will need to communicate to the originating legal entity all the changes you wish made to the legal entity change outside of REACH-IT (e.g. via e-mail).

 You may use this functionality to request the originating legal entity to delete the legal entity change. See chapter 3.6 for further details.

REACH-IT will update the status of the legal entity change to "Update requested". The originating legal entity can now update the contents of the legal entity change as described in chapter 3.5.1.

3.4 View legal entity changes

Companies can view all legal entity changes that they are involved in either as an originating legal entity or a legal successor.

From the homepage, click on the <Legal entity change \ View legal entity change> menu item.

Enter desired search criteria in the search screen. Click <Search>.

All the legal entity changes that your legal entity is involved in will be displayed.

Figure 32: View legal entity changes

Home > View legal entity change

Search legal entity change

Search criteria

Legal Entity Change Status: Click on column heading to sort by column

Legal Entity Change Name:

Select Legal Entity Change Name	Party UUID	Status	Item list
<input type="radio"/> DEMOLECO	Originating legal entity : LEA ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca Legal successor: LEB ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390	Completed	Download
<input type="radio"/> Demo	Originating legal entity : LEA ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca Legal successor: LEB ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390	Completed	Download
<input type="radio"/> SplitManual01	Originating legal entity : LEA ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca Legal successor: LEB ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390	Completed	Download
<input type="radio"/> Demo02	Originating legal entity : LEA ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca Legal successor: LEB ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390	Created	
<input type="radio"/> DEMO 01	Originating legal entity : LEA ECHA-2ed24e52-2c0f-40a3-b2e7-4cd8c60b3cca Legal successor: LEB ECHA-6b55b3fe-9241-4715-9879-1a9e21b63390	Created	Download

Select legal entity change and then click edit or delete as required.

Click to view/download item list

Click on the column headings to sort the legal entity change records.

Click a particular legal entity change name link to display all the relevant information for that legal entity change.

Click on the <Download> link in the item list column to display the item list for the legal entity change as a PDF document.

The status column describes where in the legal entity change process the legal entity change currently is. See chapter 2.2.2.3 for a mapping of these statuses to the process.


3.5 Edit a legal entity change

3.5.1 Update upon request

As the originating legal entity, you can update a legal entity change created by you for which the legal successor has requested updates to.

From the homepage, click on the <Legal entity change \ View legal entity change> menu item.

Enter desired search criteria in the search screen. Click <Search>.

 To find all legal entity changes for which an update has been requested, select status "Update requested" as your search criteria.

From the results screen, select the created legal entity change you wish to update (see Figure 32).

Click <Edit>.

Make the necessary updates. See chapter 3.2.1 for specific instructions.

Once on the <Validation> tab, click <Update legal entity change> button.

Click <OK> on the confirmation screen to complete the update process.

REACH-IT will confirm the update of the legal entity change. This confirmation will be in the form of a confirmation screen as well as an internal message. The legal entity change status will be updated to "Created" and the legal successor can now validate the update.

3.5.2 Update after completion

After a legal entity change has been completed and the items transferred to the legal successor, the legal entity change status is updated to "Completed". After this the only changes that can be done to the legal entity change are the updating of the contact persons for both the originating legal entity and the legal successor. It is important that this information is kept up to date so that the Agency and Member State Authorities can efficiently contact the correct people if needed.

From the homepage, click on the <Legal entity change \ View legal entity change> menu item.

Enter desired search criteria in the search screen. Click <Search>.

From the results screen, select the created legal entity change you wish to update contact information for.

Click <Edit>.

Update the contact information.

Navigating away from the wizard will automatically save your changes.

3.6 Delete a legal entity change

Only the originating legal entity who has created the legal entity change in REACH-IT can delete it from the system.

This deletion is only possible when the following conditions are fulfilled:


Legal successor has not yet validated the legal entity change, and

The legal entity change is editable by the originating legal entity either in status “Draft” or “Update requested”.

The legal successor can at no time delete the legal entity change. Should he disagree with a legal entity change in which he has been indicated as a legal successor, he should set the status to “Update requested” and ask the originating legal entity to delete the legal entity change from the system.

From the homepage, click on the <Legal entity change \ View legal entity change> menu item.

Enter desired search criteria in the search screen. Click <Search>.

 To find all legal entity changes in draft mode, select status “Draft” as your search criteria.

To find all legal entity changes for which an update has been requested, select status “Update requested” as your search criteria.

From the results screen, select the created legal entity change you wish to delete (see Figure 32).

Click <Delete>.

To confirm your intention to delete the legal entity change click <Yes>. To cancel your intention to delete the legal entity change click <No>.

If you confirmed your intention to delete the legal entity change in the previous step, the legal entity change is deleted from REACH-IT with no further consequences.

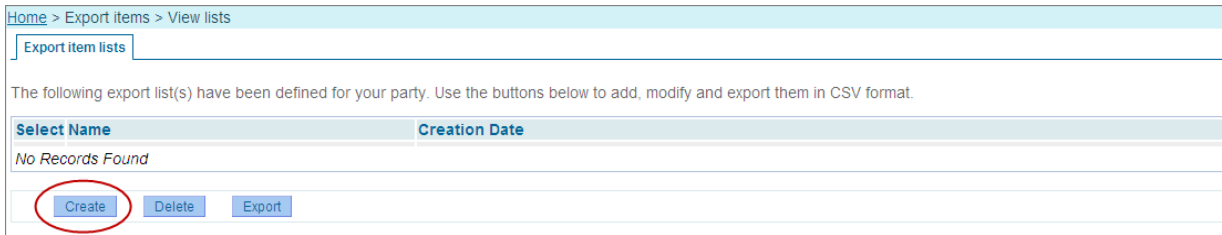
3.7 Export item list

Companies can use the export item list functionality to export from REACH-IT a list of all or selected items that they own in CSV format. This list can then be edited outside of the system to build an item list for a specific legal entity change and then imported via the bulk functionality described in chapter 3.2.1.5.

3.7.1 Create new list

From the homepage, click on the <Legal entity change \ Export items list> menu item.

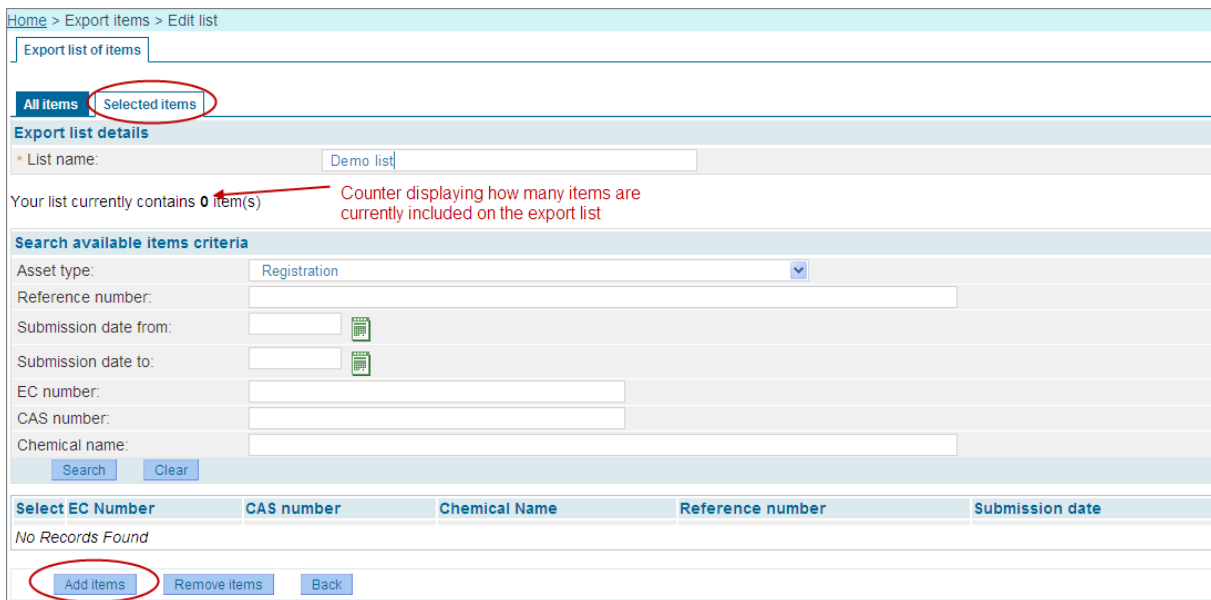
Figure 33: Create export item list



Click <Create>.

On the <Selected items> sub-tab enter a name for your list. As this is a new list, the counter will display that zero (0) items are currently on the list.

Figure 34: Export list – selected items



Click <Add items>. The system will direct you to the <All items> sub-tab where you can search all your items available for adding to your list.

Figure 35: Adding items to export list

Home > Export items > Edit list

Export list of items

All items | Selected items

In this page you may search the available items and add them to your export list

Search available items criteria

Item type: Registration

Reference number:

Submission date from:

Submission date to:

EC Number:

CAS Number:

Chemical Name:

Search Clear

You may select/deselect all at once

Select All | Select None

Select	EC Number	CAS Number	Substance name	Reference number	Submission Date
<input type="checkbox"/>	200-662-2	67-64-1	acetone	01-2114082175-50-0000	05/02/2010
<input type="checkbox"/>	200-081-4	51-17-2	benzimidazole	01-2114082179-42-0000	05/02/2010
<input type="checkbox"/>	222-128-8	3360-41-6	4-phenylbutan-1-ol	01-2114082191-56-0000	08/02/2010
<input type="checkbox"/>	255-938-5	42779-82-8	clopirac	01-2114082188-43-0000	08/02/2010
<input checked="" type="checkbox"/>	222-630-7	3562-84-3	benzbromarone	01-2114082196-46-0000	08/02/2010
<input checked="" type="checkbox"/>	203-628-5	108-90-7	chlorobenzene	01-2114082174-52-0000	05/02/2010
<input type="checkbox"/>	219-451-1	2438-72-4	bufexamac	01-2114082187-45-0000	08/02/2010

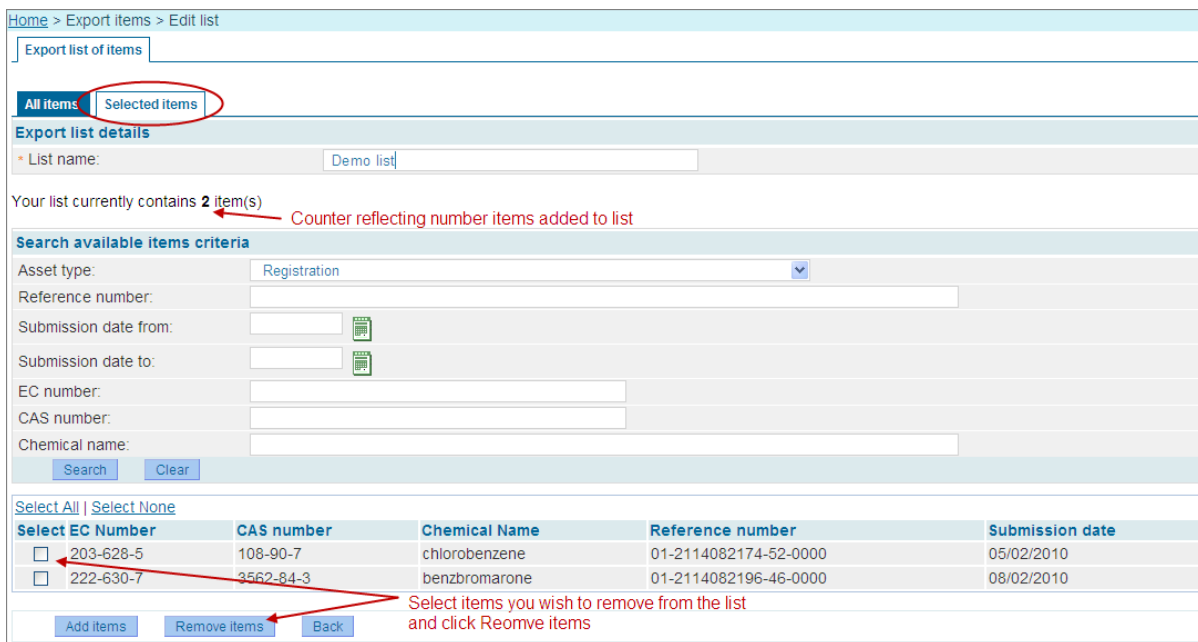
Add items

Search for the items you wish to add to your list using the available search criteria.

Select (tick) the items you wish to add to your list and click <Add items>. The system will add these items to your list.

Click the <Selected items> sub-tab to verify that your selected items have been added to the list. The counter will display how many items have been selected and you may use the available search criteria verify the contents of your list.

Figure 36: Items added to export list



Home > Export items > Edit list

Export list of items

All items | **Selected items**

Export list details

List name: Demo list

Your list currently contains 2 item(s) Counter reflecting number items added to list

Search available items criteria

Asset type: Registration

Reference number:

Submission date from:

Submission date to:

EC number:

CAS number:

Chemical name:

Search Clear

Select All | Select None

Select	EC Number	CAS number	Chemical Name	Reference number	Submission date
<input type="checkbox"/>	203-628-5	108-90-7	chlorobenzene	01-2114082174-52-0000	05/02/2010
<input type="checkbox"/>	222-630-7	3562-84-3	benzbromarone	01-2114082196-46-0000	08/02/2010

Add items Remove items Back

Select items you wish to remove from the list and click Remove items

To remove items from your list, on the <Selected items> sub-tab select (tick) the items you wish to remove and click <Remove items>. The selected items will be removed from your list and the counter is updated accordingly.

3.7.2 Edit list

You may add items or remove items from existing lists.

From the homepage, click on the <Legal entity change \ Export items list> menu item. The system will display previously created lists.

Click the list name link of the list you wish to edit.

Now you may add / remove items as needed. See chapter 3.7.1 for details.

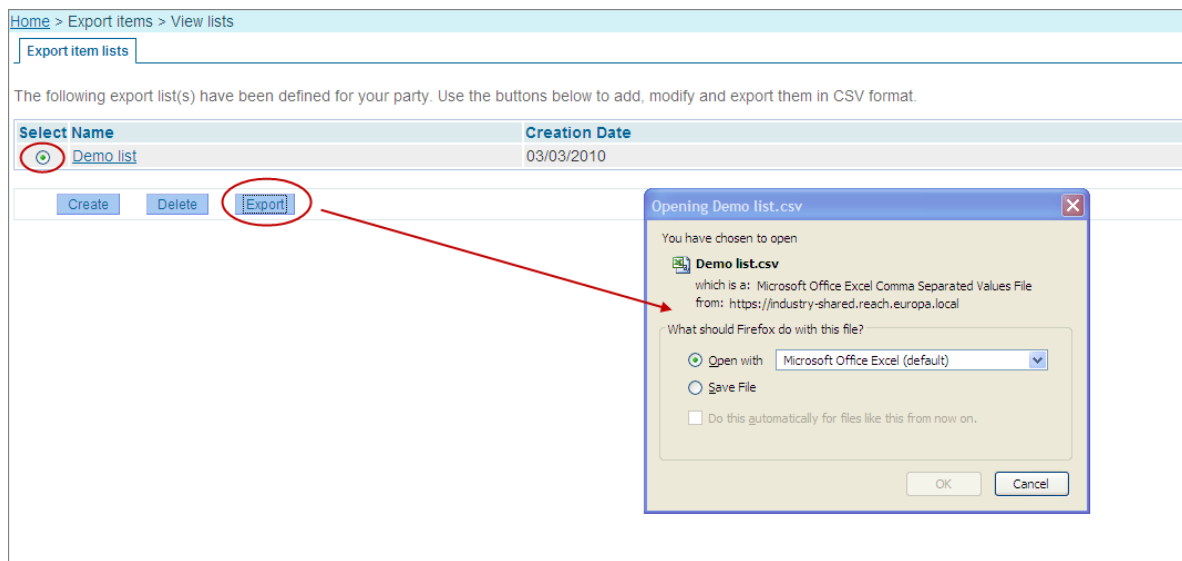
3.7.3 Export list

You may export a list of items you have created from REACH-IT in CSV format.

From the homepage, click on the <Legal entity change \ Export items list> menu item. The system will display previously created lists.

Select the list you wish to export and click <Export>.

Figure 37: Export list in CSV format



Save the file to your file system.



The CSV format is the following:

reference number, item type, submission date, EC number, CAS number, chemical name

Only the reference number is significant in the bulk upload.

3.7.4 Delete list

From the homepage, click on the <Legal entity change \ Export items list> menu item. The system will display previously created lists (see Figure 32).

Select the list you wish to delete and click <Delete>. The list will be deleted from REACH-IT.

