



# Understanding EU REACH

*& the role of an  
Only Representative*

A practical guide for non-EU companies  
seeking access to the EU market.

**CHEMENTORS**

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# 1 SUMMARY

The European Union offers one of the world's most economically beneficial and stable markets, but also one of the most highly regulated.

Whether your business sells **raw materials, accessories, components, or finished goods**, your products may fall under the **REACH Regulation** (Registration, Evaluation, Authorisation, and Restriction of Chemicals Regulation (EC) No 1907/2006).

The REACH regulation is set to protect human health and the environment by monitoring the use of chemical substances in all products placed on the EU market.

It affects **both EU and non-EU companies** whose products contain chemical substances, even if those substances are part of a mixture, coatings, electronics, polymers, textiles, or packaging.

Since **only EU-based companies** can register with the European Chemicals Agency (ECHA), exporters outside the EU face a regulatory barrier.

*Article 8 of the REACH regulation provides the solution: the appointment of an **Only Representative (OR)**, an EU entity that takes full legal responsibility for REACH registration and compliance.*

## Appointing an experienced OR allows your company to:

- ✓ Open the entire EU market to all potential importers.
- ✓ Maximize profitable and compliant business opportunities.
- ✓ Maintain direct and proactive control over REACH compliance.
- ✓ Protect confidential product formulation data.
- ✓ Simplify trade by relieving your EU importers of regulatory duties.
- ✓ Ensure business continuity in the European market.

**Registration via OR: Gain full EU market access, reach unlimited importers, and boost your profits.**

This white paper explains what REACH means in practice, why appointing an OR is critical,

and how Chementors helps exporters comply efficiently and confidently.

## 2 INTRODUCTION: THE IMPORTANCE OF REACH COMPLIANCE

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REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) is the EU's key system for monitoring chemical safety. Its principle is simple: companies placing chemical substances on the EU market must understand and manage the risks associated with them.

### Who is affected?

Companies in the EEA that must register:

- **Manufacturers** of a substance either on its own or in mixture, in quantities of 1 tonne or more per year.
- **Importer** of a substance either on its own or in a mixture, in quantities of 1 tonne or more per year.
- **Producer or importer** of articles (for example: electronic components, textiles, furniture, automotive accessories) that contain any substance in quantities of 1 tonne or more per year and are intended to be released under normal or reasonably foreseeable conditions of use.
- **Only representative** appointed by a non-EEA manufacturer or formulator.

If your product contains a regulated substance, even as part of a component or coating, REACH may apply. Without proper registration or exemption, those products **cannot legally be sold** in the European Union.

## 3 REACH CHALLENGES FOR NON-EU COMPANIES

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For many non-EU suppliers, REACH compliance can feel complex and overwhelming. The regulation is **unfamiliar** to most non-EU companies, making it very difficult to navigate

where to start and how to complete it correctly and confidently. The official regulatory documents and guidance materials alone are too extensive, with thousands of pages to go through.

**Key challenges include:**

- × **Limited eligibility:** Only EU entities can register with ECHA.
- × **Dependence on importers** who may not prioritize your interest.
- × **Loss of data control** when importers register on your behalf.
- × **Risk of shipment delays or bans** if compliance proof is missing.
- × **Limited expertise and resources** to understand all REACH texts, master all scientific terms and tools, and manage the requirements.
- × **Complex process** with data assessment, testing, and registration preparation.

Many companies mistakenly assume their EU clients will “handle REACH.” This could risk long-term market access and significantly limit your business opportunities. The more strategic route is to **appoint a professional Only Representative** to manage REACH obligations centrally and transparently.

*Once you hold a REACH registration for your substances through the OR, you can **freely trade** across the whole EU market.*

## 4 THE ROLE OF THE ONLY REPRESENTATIVE

Under **Article 8 of REACH**, a non-EU company that manufactures a substance on its own, in mixtures, or in articles, formulates a mixture or produces an article, may appoint an **Only Representative (OR)** established within the EU to fulfill the obligations on importers. An OR is the official compliance entity for your company.

### OR's responsibilities

- Represent your company to ECHA.
- Contact point for all communications with ECHA.
- Register substances under its name on your behalf.
- Manage all REACH compliance duties.

- Develop a testing plan to fill in missing data.
- Maintain annual tonnage and downstream user records.
- Ensure safety data sheets and exposure scenarios remain aligned with registered data.
- Communicate with downstream users.
- Handle post-registration notifications and requests from ECHA and the consortium.

## Why appoint an OR

- ✓ **Full market access.**
- ✓ **No need to establish an EU subsidiary.**
- ✓ **More business deals in less time:** No need to wait for months for your importer to register.
- ✓ **Protection** of confidential product formulation data.
- ✓ **Reduced workload** and legal responsibility for your importers. Competitiveness is increased.
- ✓ **Enhanced market credibility** and trust. Holding a REACH registration demonstrates your commitment and long-term investment in the market.
- ✓ **Clear documentation** for customs purposes and customers' requests.

## 5 REACH REGISTRATION PROCESS

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Even though REACH involves complex scientific and technical work, the overall process follows a logical sequence.

### Step-by-step

#### Substance Identification

- Identify the composition of the substance.
- Confirm the substance identification.

### **Inquiry dossier**

- Compile and submit the inquiry dossier application to ECHA.
- Follow up on ECHA's decision on substance identification.
- Follow up on ECHA's assessment outcome for joint registration.
- Address any follow-up questions or additional requests from ECHA.

### **Registration dossier**

- Communicate with the Consortium/Lead Registrant regarding data-sharing.
- Pay the Letter of Access fee charged by the Consortium/Lead Registrant.
- Compile and submit the registration dossier to ECHA.
- Pay the ECHA fee charged by ECHA.
- Follow up on ECHA's assessment outcome on the registration.
- Handle any follow-up questions or additional requests from ECHA.

### **Post-Registration Maintenance**

- Monitor notifications and compliance checks from ECHA and the Consortium.
- Monitor annual tonnage records.
- Keep SDS and exposure scenarios up to date.
- Maintain records on volumes, importers, etc.

## 6 WHY A COMPETENT OR MAKES THE DIFFERENCE

Your Only Representative is the regulatory backbone of your EU trade. Choosing the right partner can determine whether compliance is smooth or risky.

### Risks of an inexperienced OR

- Applications rejected or delayed due to unqualified data or lack of technical know-how.
- High risk of facing an ECHA compliance check due to poor-quality data.
- Missed ECHA compliance requests leading to fines.
- Unable to provide helpful consultancy or protect your rights.
- Missed updates on tonnage changes leading to non-compliance.
- Poor coordination with authorities, consortium, and importers.
- Exposure of confidential business data.
- Uncooperative data transfer during the OR termination process.

### Benefits of a competent OR

- The registration is completed on time and in line with your export schedule.
- Quality of submitted data meets requirements: fewer future compliance checks.
- Strategic plans and solutions are provided to tackle post-registration matters.
- Diverse and dynamic networks in the field to provide consulting.

*An effective OR doesn't just do paperwork. It legally represents your company to the EU authority. It **protects your legal compliance, reputation, revenue, and market continuity.***

## 7 CHEMENTORS' APPROACH TO OR SERVICE

At **Chementors**, our mission is to make compliance effortless and strategic. We combine scientific expertise with regulatory precision, proactive and transparent communication. We do what the REACH regulation requires.

### Our core services

- Represent non-EU clients toward ECHA and the consortium.
- Act as the primary contact for ECHA and all downstream users.
- Identify the REACH requirements for each project's context.
- Evaluate scientific and technical data, identify data gaps.
- Plan, arrange, and monitor lab tests; assess reports.
- Prepare and submit the dossiers; manage REACH-IT account.
- Prepare Chemical Safety Reports and compile safety data sheets.
- Manage post-registration notifications and compliance checks.
- Maintain annual tonnage and downstream user records.

### Why choose Chementors

- ✓ **Over a decade** of experience in EU chemical and product compliance.
- ✓ **More than 150** completed REACH registrations for chemicals, mixtures, and articles.
- ✓ **Proven OR expertise** for non-EU suppliers across industries.
- ✓ **Multidisciplinary team** of chemists, toxicologists, and regulatory experts.
- ✓ **Optimized REACH plan** for each project's needs.
- ✓ **Member of REACHReady** and Only Representative Organisation (ORO).

With Chementors as your Only Representative, you gain **peace of mind** and **freedom to focus on your core business**.



## 8 CASE STUDY: SECURING EU MARKET ACCESS

### CASE STUDY: Hock Chemie

**Client Profile: Hock Chemie, China**

Hock Chemie is an innovative pioneer in manufacturing personal cosmetic materials. Their objective is to provide high-quality cosmetic raw materials for global clients.

**Challenge:** Raw materials for cosmetics must be REACH-compliant. Hock Chemie needed a LOT of help to make a full EU REACH registration.

**Solution:** In May 2016, they made an agreement with Chementors for two full REACH registrations and OR service.

*“Every time we had any questions or comments, we got fast professional replies. Chementors managed to save our money by contacting the authorities and relevant parties. They handle everything about registrations, letting us focus on product manufacturing and sales.”*

— **Liang Huan Bin**, Hock Chemie Executive

## 9 REACH COMPLIANCE CHECKLIST

### COMPLIANCE CHECKLIST

- Do your products (substances, mixtures, or articles) contain chemicals?
- Has your chemical reached the 1 tonne per year limit?
- Do you have a legal entity established in the EU?
- Have you appointed a qualified Only Representative under Article 8?
- Are your Safety Data Sheets aligned with registered data?
- Are you tracking annual export volumes by importer?

## 10 CONCLUSION: YOUR COMPLIANCE PARTNER IN EUROPE

REACH compliance is not just a legal formality. It is a **license to operate** in the European market. By appointing a trusted Only Representative, you ensure your products meet EU requirements, your supply chain remains stable, and your brand earns credibility with customers.

Chementors provides end-to-end REACH OR services tailored to businesses of every scale and sector. We handle technical complexity, communication, and continuous monitoring so you can expand confidently in Europe.

**Secure your EU market access today.**

**Email:** [info@chementors.com](mailto:info@chementors.com) | **Web:** [www.chementors.com](http://www.chementors.com)

# 11 ABOUT CHEMENTORS

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## Your trusted chemical safety partner

- Since 2012
- Finnish company. Headquarters in Finland, offices in Vietnam and Hong Kong
- Completed over 150 REACH registrations
- More than 300 clients worldwide

Chementors helps companies make sense of the complex world of chemical and product safety. Based in Finland and serving clients worldwide, we take care of every step: from compliance assessments to full turnkey safety management. Therefore, our clients can focus on what they do best: growing their business.

Our work goes beyond meeting regulations. We help companies enter and grow in the EU market smoothly by ensuring compliance, minimizing risks, and turning regulatory requirements into a competitive advantage.

## A global team with a shared goal

- ✓ Offices in Finland, Hong Kong, and Vietnam
- ✓ Serving clients on all continents
- ✓ Multilingual regulatory support

Wherever our clients operate, we are there to help them meet local and international standards efficiently and confidently.

## Our Mission

Our mission is to make chemical safety simple. We help companies navigate the jungle of global regulations so they can run their businesses without getting lost in compliance paperwork. Chementors handles every chemical safety routine on a turnkey basis by being practical, reliable, and complete.

## Our Vision

We want to make the world a safer place to live. Chementors works with clients, partners, authorities, labs, and industry professionals to protect people through smart, science-based chemical and product safety.

## What we stand for

- **Efficiency without compromise:** Our experts combine deep technical knowledge with practical experience from industry to deliver cost-effective, efficient and compliant results.
- **All-in-one service:** We take full responsibility for our clients' chemical and product safety routines, so they can focus entirely on their business.
- **Trust and support:** Our clients know they can count on us. We are accessible, responsive, and committed to mentoring — not just managing — every step of the process.

## Our story

Founded in 2012 in Finland, Chementors began with a simple insight: companies needed a partner they could trust to manage chemical regulations globally. What started as a small consultancy quickly grew into a worldwide network. We opened offices in Hong Kong in 2015 and Vietnam in 2017, building strong partnerships with safety professionals and organizations across continents.

Today, Chementors continues to grow — connecting people, industries, and ideas to make chemical safety a shared global responsibility.

**Don't be overwhelmed – we do the work for you**

**When your products fall under complex chemical or safety regulations, we handle every step so you can focus on your business. Let's talk about how we can simplify your EU market entry, ensure compliance, and help your company grow sustainably.**

## 12 APPENDIX

### Glossary of Key Terms

<b>REACH</b>	Registration, Evaluation, Authorisation and Restriction of Chemicals.
<b>ECHA</b>	European Chemicals Agency, the authority managing REACH.
<b>Only Representative IUCLID</b>	EU-based entity representing a non-EU manufacturer under Article 8. International Uniform Chemical Information Database.
<b>CSR</b>	Chemical Safety Report.
<b>SDS</b>	Safety Data Sheet provided to downstream users.

### References

- REACH Regulation (EC) No. 1907/2006.
- ECHA Guidance on registration (latest edition).
- Article 8: Only Representatives for non-EU manufacturers.

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