



THIS WEEK IN HELPDESK

Legal submitters & foreign users

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In some cases, appointing a foreign user may be helpful to companies facing notification obligations according to Article 45 CLP. Read on to find out more!



Who is the legal submitter and what is a foreign user?

The **legal submitter** is the duty holder having the obligation to submit information. When preparing a dossier in IUCLID, this term can also refer to a non-duty holder who submits information on a voluntary basis. A **foreign user** is an external 'third party' user that a company appoints to work on their behalf in any of the ECHA IT applications. A foreign user can flexibly switch between their own account and that of the company who they are working on behalf of. This can be done both in the ECHA Cloud services and the Submission portal.

Who can be a foreign user?

Any company, EU or non-EU based, can be a foreign user, provided they have a valid ECHA Account detailing their legal entity information. Once a third party has been appointed as a foreign user, they can work as if they were a user within the company who appointed them. Consultants or mother companies can be appointed as foreign users, so that they can log in with one account and switch easily between another account they have been appointed to work under. It is possible that a foreign user works for several companies.

How can a foreign user support the legal submitter?

In the PCN context, foreign users may support the legal submitter by preparing a notification and also by making the submission. The foreign user is acting on behalf of the legal submitter so care must be taken in both the preparation and submission phases to ensure the consistency of legal entity UUIDs in the dossier and Portal. See our PCN practical guide for more <https://poisoncentres.echa.europa.eu/echa-submission-portal>.

What does a foreign user have access to?

Foreign users have access and visibility to information within the ECHA IT applications, including information contained in the IUCLID instance of your legal entity. This must be taken into account before appointing a foreign user.

It is not possible for the appointing company, to see any information belonging to other customers of the foreign user and vice versa.

Currently there is no possibility to avoid full visibility of information to the foreign user and while ECHA does recommend entering into contractual agreements, no guidelines for this have been established. This needs to be determined by the parties involved.