R4BP data migration
Instructions for companies
05 July 2013

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R4BP2 to R4BP3 data migration: step-by-step instructions for companies

This document describes the prerequisites and preparatory tasks that you need to perform to enable the migration of your authorisations (granted under the BPD[1] and recorded in R4BP2, established and maintained by the Commission) to the R4BP3 system (the Register for Biocidal Products established and maintained by ECHA, Article 71 of the Biocidal Products Regulation, BPR[2]), where all the new processes (including those that start from existing authorisations (e.g. new mutual recognition, renewal of authorisation, etc.) are to be initiated, after 1 September 2013 when BPR applies[3].

For clarification, the actors involved are briefly explained:

- **Authorisation holder**: the person/entity established within the Union who is responsible for the placing on the market of a biocidal product in a particular Member State or in the Union and specified in the authorisation.

- **Representative** (e.g. a **consultant**): the person/entity acting on behalf of the authorisation holder, e.g. when applying for an authorisation.

- **Account holder**: individual person that holds an account in R4BP2 which can be the authorisation holder or its representative.

Both software tools have different **access systems**: whereas the access system for R4BP2 is based on "account holder" (individual person), R4BP3 is based on "legal entity" (company). Taking into account this difference, an existing authorisation can be only migrated from R4BP2 to R4BP3 after the "ownership" of the authorisations to a company is digitally assigned in R4BP2 using a code that can be identified by both systems. Therefore, the granted authorisations recorded in R4BP2 need to be tagged with the **LE UUID** (Legal Entity Universal Unique Identifier) of the authorisation holder. The LE UUID, a string of 41 characters that uniquely identifies a Legal Entity, can be obtained from the REACH-IT application.

To facilitate the migration process, R4BP2 has been recently modified and can only be accessed when a LE UUID is indicated in the account holder's details. As a prerequisite, every account holder needs to acquire a LE UUID.

Where **the authorisation holder and the account holder are the same entity (Case 1)**, only one LE UUID needs to be included in the account holder's details in R4BP2 as well as in each registered authorisation in the account.

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[1] Directive 98/8/EC concerning the placing of biocidal products on the market
[2] Regulation No 528/2012 concerning the making available on the market and use of biocidal products
[3] Note that this does not apply to product authorisations granted under national laws during the transitional period of the Review Programme (Article 16(1) to the BPD)

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Where **the authorisation holder and the account holder are different persons/entities (Case 2)**, e.g. a representative or consultant working on behalf of a company, the LE UUIDs of both are required in R4BP2: the LE UUID of the account holder (i.e. the representative) needs to be included in its account holder details, and the LE UUID of the authorisation holder needs to be included by the representative to each of the authorisations of the authorisation holder.

IMPORTANT NOTE:

The authorisation holders are strongly recommended to sign-up in REACH-IT and obtain their LE UUID themselves. If a company delegates this task to a representative, which is working on their behalf, the company would provide full control of their legal entity account to this third party. The reason for this is that during the company sign-up process, in addition to the creation of the LE UUID, the user administrator account for the company is created. The user administrator has full access and control over the company account including the possibility to create further user accounts for the company.

It is extremely important to understand the possible consequences of allowing representatives to sign-up in REACH-IT on one's behalf. Like with user account details of any other IT system, a company should take utmost care of their REACH-IT account used for accessing R4BP3 to prevent that confidential business information is accidentally revealed.

What do companies have to do?

The account holders have to include their LE UUID into their R4BP2 account details.

The authorisation holders need to digitally claim the ownership of their authorisations and applications by having them tagged in R4BP2 with their LE UUID.

Only the account holder can access R4BP2. Where the account holder and the authorisation holder are not the same person/entity, the authorisation holder can therefore not access R4BP2. This needs to be done by its representative (who holds the account). The authorisation holder should therefore, after getting its own LE UUID, provide it to the account holder (representative) who will tag the authorisations for him.

For further clarification, the steps to follow (for the above cases) are described:

Case 1 (Authorisation holder = account holder):

1. Obtain a LE UUID via REACH-IT.
2. Introduce this LE UUID in your R4BP2 account. The system will automatically tag all the authorisations and applications with your LE UUID.

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Case 2 (Authorisation holder ≠ account holder):

* Authorisation holder:

1. Obtain a LE UUID via REACH-IT.
2. Provide the representative (account holder) with your LE UUID.

* Account holder (representative):

1. Obtain a LE UUID via REACH-IT.
2. Introduce your LE UUID in your R4BP2 account.
3. Manually introduce the authorisation holder's LE UUID in each authorisation and application.
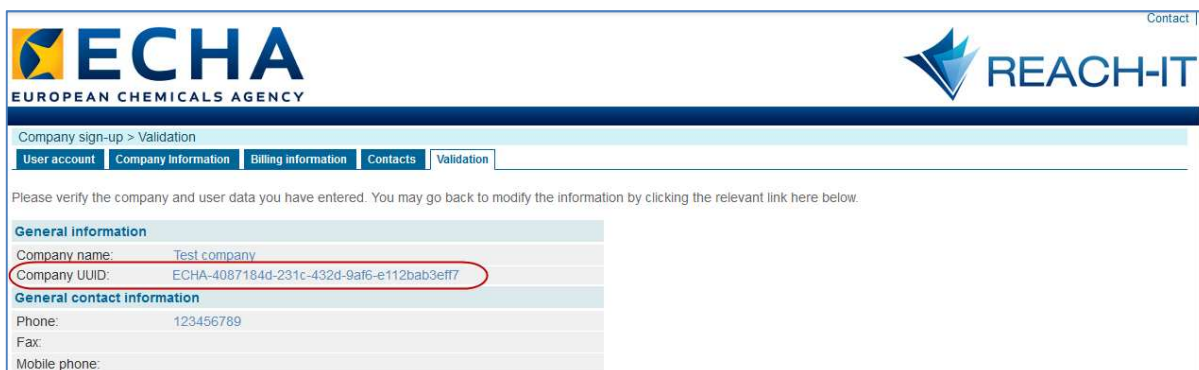

How to do it?

1. Obtain a LE UUID

Complete 'company sign-up' with ECHA via REACH-IT to receive your LE UUID. Unless you already have a LE UUID for REACH and/or CLP purposes, in which case, you only need to retrieve the LE UUID from your REACH-IT account.

a. Go to REACH-IT: https://reach-it.echa.europa.eu/reach/public/welcome.faces
b. Click on "Sign-up as a company" link and complete the company sign-up procedure following the instructions provided.

   Further instructions on how to sign-up are provided in the manual:
   http://echa.europa.eu/documents/10162/13654/reachit_signup_accmngt_en.pdf.

c. Take note of your LE UUID (e.g. by copy-pasting).
   The LE UUID looks like this: ECHA-4087184d-231c-432d-9af6-e112bab3eff7
   (see the example below). It is needed for the next step, the tagging in R4BP2.

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2. Tag authorisation records in R4BP2 with the authorisation holder's LE UUID

Case 1 (Authorisation holder = account holder): where the system (R4BP2) is able to match the account holder's email with that of the authorisation holder, the LE UUID will automatically be tagged in all the applications and authorisations of the account holder.

Case 2 (Authorisation holder ≠ account holder): when the account holder and the authorisation holder are different entities, i.e. when a representative is involved, the LE UUID tagging of the authorisations need to be updated manually. An edit function (pencil) is foreseen for this purpose. Applications can already be edited with the LE UUID of the future authorisation holder, even before the authorisation of the biocidal product is granted.

When to do it?

The migration will be performed only for those national biocidal product authorisations which are correctly recorded in R4BP2 and tagged with a LE UUID.

Authorisations tagged **by 16.08.2013** will be migrated into R4BP3 by 1 September 2013, subject to MSCA confirmation. Authorisations tagged after that date will be migrated in the subsequent migrations (dates still to be confirmed).

ECHA strongly recommends tagging both the authorisations already granted and the applications under evaluation as soon as possible in order to facilitate the migration process. The applications under evaluation will be migrated once they have been granted.

Support

Please consult the ECHA Helpdesk at: http://echa.europa.eu/en/web/guest/contact