

# Which type of account do I need?

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## Why create an account?

In order to identify who is submitting the registration(s), the information set out in section 1 of annexes 1, 2 and 6 of the Royal Decree is collected in an account. Creating an account gives you access to the registration tool and allows you to submit one or more registrations.

The practical manual 'how to create an account' gives more information about the information asked during the process of the creation of an account.

## Who can submit registrations?

According to Art 5 of the Royal Decree, the registration has to be submitted by the registrant, or on behalf of the registrant.

Article 6 of the Royal Decree describes who can furnish the information, requested in section 2 of annexes 1 and 2 of the Royal Decree, when the substances produced in nanoparticulate state, as such or in mixtures, are delivered by a supplier who is not responsible for placing them on the Belgian market ([The foreign supplier](#)).

This combination has led to the configuration of three types of accounts in the registration tool: you can be the registrant, a representative or a foreign supplier. An overview of these types of accounts and the consequences is given in [the scheme](#) below.

However, the person or legal entity placing the substances or mixtures on the market remains responsible for the registration.

## The registrant

The registrant who chooses to submit his own registrations, creates the 'registrant' account type.

In this case, the registrant can indicate whether he has an identification number from the Crossroads Bank of Enterprises (CBE) and then use this number to create his account. Using the CBE identification number is advantageous as some of the requested data will be retrieved from the Crossroads Bank of Enterprises. For example, the data for the different establishment units of the company will be retrieved as registered in the Crossroads Bank of Enterprises.

When the registrant does not have a CBE-number, he can enter the data manually.

The registrant account type allows you to submit registrations for substances and mixtures and their annual updates.

## The representative

Each legal entity can represent the registrant, on condition that the representative is situated in the European Economic Area. It is strongly recommended that there is a written agreement between the represented body and the representative, as the obligation to register remains the responsibility of the registrant.

As a representative you can represent more than one company. It is possible to add more than one represented company to this account. At the level of the registration of the substance or mixture, the representative can indicate the represented company for which this registration is submitted.

It is important to note that the representative has immediate access to all the registrations for all the represented companies. It is not possible to create selective access within one account.

It is not possible to use the CBE-identification number to create this type of account, even if the representative is a Belgian company with a CBE-identification number.

The representative account type allows you to submit registrations for substances and mixtures and their annual updates..

## The foreign supplier – inverse registration

The foreign supplier is called 'foreign' because he does not place the substances in nanoparticulate state, as such or contained in a mixture, on the Belgian market. He transfers these products to the person(s)/legal entities who place them on the Belgian market. This means that the foreign supplier registers on a voluntary basis.

The foreign supplier can only register the technical details, used to describe the characteristics of the substances in nanoparticulate state (as set out in section 2 of annexes 1 and 2 of the Royal Decree). He may decide to do this in order to help any of his customers who have to register. In so doing:

- the foreign supplier does not reveal the characteristics of the substance in nanoparticulate state, to his customers
- the customers can use the registration number of the foreign supplier and use the option of a limited registration.

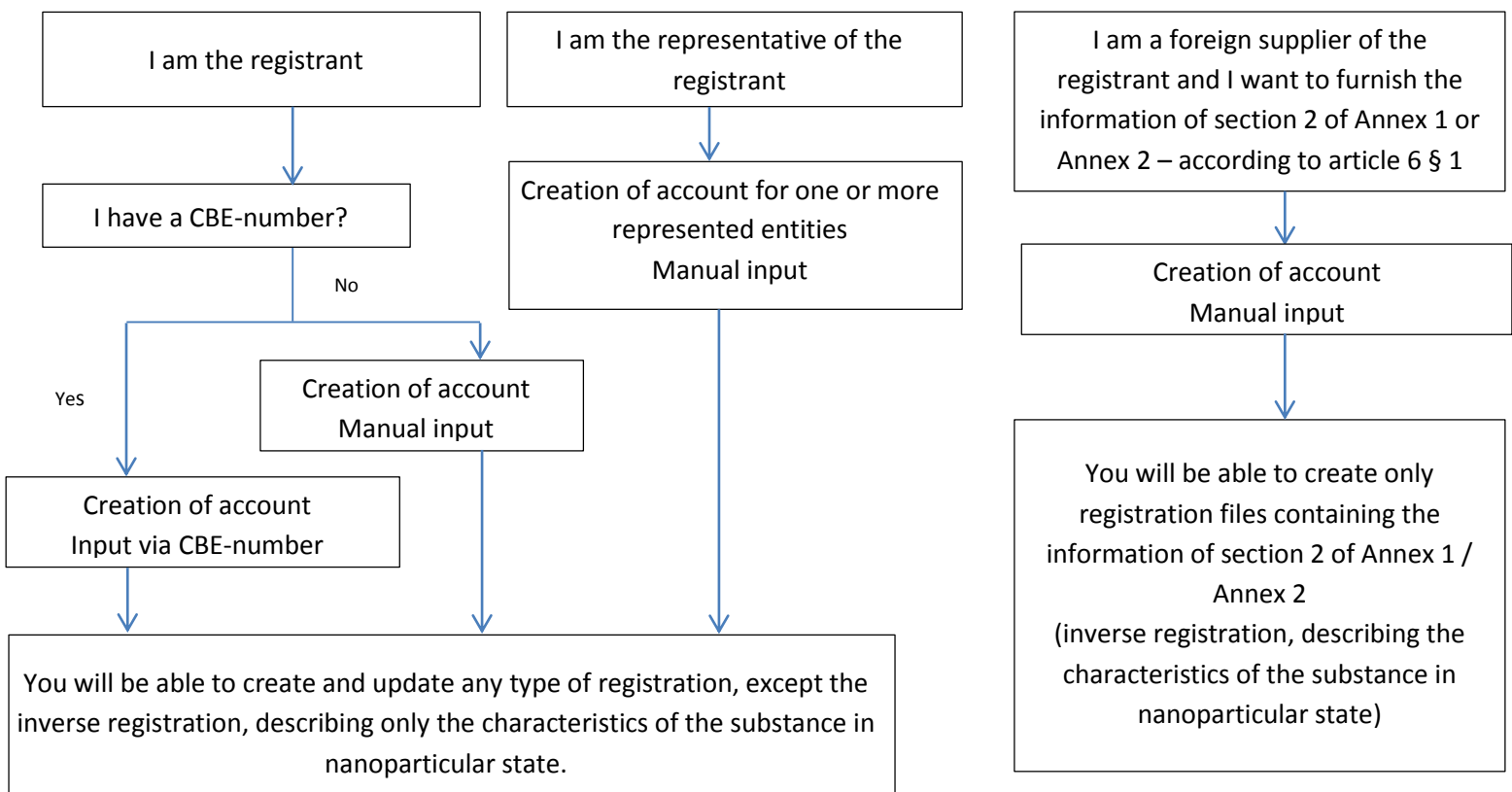
A limited registration (cfr. Art 8 of the Royal Decree) is a registration whereby the technical details describing the characteristics of the substances in nanoparticulate state (as set out in section 2 of annexes 1 and 2 of the Royal Decree) are replaced by an existing registration number. The chemical name and formula however still need to be registered in a limited registration.

The registration submitted by the foreign supplier, containing only the information described in section 2 of annexes 1 and 2, is called an inverse (of the limited) registration and in fact comprises only the registration of the characteristics of the substance in nanoparticulate state, as such or in a mixture

For the creation of this type of account, the data are entered manually.

Within the foreign representative account type, you are only able to submit inverse registrations. No annual update has to be done for this type of registration.

## Scheme account types



*More info about the creation of an account?*

See FAQ A.51.a at [www.nanoregistration.be](http://www.nanoregistration.be)

*More info about the registrant?*

See FAQ A.51.b at [www.nanoregistration.be](http://www.nanoregistration.be)

*More info about the representative?*

See FAQ 6.1.a at [www.nanoregistration.be](http://www.nanoregistration.be)

*More info about the foreign supplier?*

See FAQ 6.a, FAQ 6.1.b, FAQ A.S2.a at [www.nanoregistration.be](http://www.nanoregistration.be)

## **I have to register. Where can I find more information?**

On the website [www.nanoregistration.be](http://www.nanoregistration.be), you can find more guidance documents:

- Do I have to register?
- When do I have to register?
- Which type of registration can I submit?
- Practical manual: how to create an account
- Practical manual: how to submit a registration
- Overview (fields in software, uses, nace(bel))
- The Royal Decree
- FAQs
- The link to the registration tool

In case of questions, contact the helpdesk via [info@nanoregistration.be](mailto:info@nanoregistration.be)