Subject: Reply to your request of ATD/028/2020

Dear Mr Drewnowski,

Thank you for your request of 12 March 2020, registered on 13 March 2020, seeking access to documents. Your request falls under Regulation (EC) No 1049/2001 (the “ATD Regulation”) which governs the access to documents held by the European Chemicals Agency.

Your request concerns access to statistics of REACH-IT system related to legal entity changes. In particular:

1) Number of legal entity changes completed per year for years 2009-2019.
2) Number of legal entity changes initiated per year for years 2009-2019.
3) Number of legal entity changes completed where the legal entity was the Lead registrant for a substance.

Decision

Based on Article 7(1) of the ATD Regulation

ECHA has decided to grant you partial access to the requested documents.

Reasons

Statistics on the numbers of legal entity changes requested in 1) and 2) are available for the period 2010-2019. Please note that there is no data available corresponding to year 2009 regarding legal entity changes.

Moreover, I regret to inform you that no documents were found that correspond to the description given in your application for 3) the number of legal entity changes completed where the legal entity was the Lead registrant for a substance.

According to Article 2(3) of the ATD Regulation, ECHA can only provide access to documents that are in the possession of the institution. Therefore, we are not in a position to meet your request.

Advice and further observations

You are reminded that following Article 16 of the ATD Regulation, the document attached is subject to copyright protection.
You may re-use the document/documents requested free of charge for non-commercial reasons provided that the source is acknowledged.

**Appeal/legal redress**

You are entitled to make a confirmatory application requesting ECHA to review this position by writing to the Executive Director of ECHA (P.O Box 400, 00121 Helsinki, Finland or executive-director@echa.europa.eu). This needs to be done within 15 working days of receiving this letter.

The Executive Director will inform you of the result of the review within 15 working days from the registration of your subsequent request.

Yours sincerely,

e-signed,

Mercedes Viñas
Head of Unit A4 - Data Availability
Directorate of Submissions and Interaction

**Encl:** Attachment 1
- ATD 28-2020 LEC data
(total 1 page)