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Poison centres: getting prepared to notify your hazardous mixtures: webinar Q&A transcript

Date: 11 December 2018

Starting time: 11:00 Helsinki Time (EET, GMT +2)

If your question has not been answered during the webinar or you have a follow-up question, [contact us](#).

Minor editing of some of the questions has been carried out by ECHA prior to publication in order to compliment and clarify the answers given during the webinar.

Q: Can you do a limited submission for products that are used as Raw materials for consumer products, if you are only putting them on the market as industrial use only?

A: If a mixture ends up in a consumer product (even though first only supplied to industry), the deadline for consumer use applies. Also, no limited submission.

Q: The cosmetic product final are not included of the CLP but could you confirm/tell if we sold some pre-mix of cosmetic ingredients for the DO IT YOURSELF/HOME MADE cosmetic product are included or not by the CLP scope and also the the notification ?

Q: Why are H280 (gas under pressure, if correct) excluded if expansion leads to frost burns with, to my understanding, needs special medical treatment?

A: We do not have available the exact basis for this decision, but it should be evident to the advice provider from the description of the container by the caller that it is a gas under pressure.

Q: Who needs to notify: the registration holder (1 UFI in the EU) or the local distributor (1 UFI in each country)? (Sorry, I missed the introduction). Thank you.

A: Distributors have no obligation to notify but importers and downstream users. Distributors can notify on a voluntary bases. If a new UFI has been generated at any point of the supply chain, it must be notified in all EU Member States where it is placed on the market.

Q: Can an OR notify on behalf of an importer?

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A: CLP does not include the role of the OR. Therefore the obligation remains on DUs and importer. The submission can be prepared and physically submitted by any third party.

Q: As Helpdesk I would like to know if some training for us are plan to be able to help companies who will ask questions. Would be nice to be able to provide practical advice. Thank you

A: Yes, there will be training later - when the tool development has stabilised.

Q: Will we need a electronic certificate to declare to the PCN? As it is actually the case in FRANCE, where a RGS certificate is required. Thanks!

Q: Will there be fees for the declaration of a product for some countries?

A: The question on fees was addressed by the speakers.

Q: There have been concerns about the readiness of the ECHA system but how ready are the appointed bodies in the Member States ?

Q: Thanks for your answer. I am a bit confused: during the presentation, it was said that if a mixture is for industrial use but found in consumer products, the deadline is 01/01/2020; you confirm that this deadline is NOT applicable to cosmetic ingredients?

A: Notification obligations do not apply to cosmetic products. Therefore the latter do not count for defining the deadline.

Q: What if the composition of the mixture of my supplier is confidential and the UFI is not available to ECHA? What should be stated on the label?

Q: How can we differ between industrial and professional products? What are the criteria to be fulfilled for professional used products?

A: Mixture for professional use means a mixture intended to be used by professional users but not at industrial sites;

Mixture for industrial use means a mixture intended to be used at industrial sites only.

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Q: How many countries are signing up to the harmonised portal and is there an update on fee structure?

A: The question on fees was answered by the speakers.-

Q: if a supplier manufactures a product with our brand, who have to notify the mixture?

A: The formulator as downstream user has to notify. If this is the case of toll formulating, see the draft guidance linked at: <https://poisoncentres.echa.europa.eu/guidance> by searching toll formulator.-

Q: If I import a mixture from a non-EU country, I usually don't know the composition. And the supplier cannot be forced to inform about all components. How should a notification look in that case?

A: Your supplier may notify voluntarily in EU (see guidance) and give you the UFI. And then you rely on its UFI. If you don't get the information needed, you may not be able to notify and place product on the market.

Q: If a manufacturer of a hazardous mixture is located outside the EU, but exports its mixtures to customers within the EU, can a 3rd company (within the EU) notify on behalf of the manufacturer? So an OR type arrangement could be put in place?

A: In CLP, the concept of OR does not exist, however, an EEA based legal entity can notify, similarly to the OR. The EEA importers remain duty holders but can use the submitted information in their notifications.

Q: We have been advised that if we have registered with the body prior to the deadline we have until 2025 to apply the conditions of Annex VIII, including the addition of the UFI to the label- is this correct?

A: Yes

Q: Are aerosols (H222, H229) in scope?

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Q: What is the format of the toxicological information?

A: The toxicological information is taken from section 11 of the SDS and it can be sent as free text field, including tables.-

Q: Yes but what is with the translation?

Q: Which kind of information is to be mentioned?

Q: If nn Eu want to notify? It is possible because for secrecy

A: No, only via an EEA legal entity. See draft guidance linked at: <https://poisoncentres.echa.europa.eu/guidance>, in particular Sections 3.1.1 & 4.2.5 -

Q: can de UFI number be printed together with the batch number of the product?

Q: So no on the CLP label

A: I answer both your questions here. In some cases the UFI can be printed on the packaging e.g. near the batch number, but there is a general understanding that this should be as close to the label (or in close proximity) as possible.-

Q: How could the label information be consistent with the submitted product information by the DU if a relabeller (Distributor) is not obliged to submit information acc. CLP Annex VIII?

A: The issue of data gap because of DU not being a duty holder is known and under discussion between the Commission and Member States. Commission proposed amendment to Annex VIII in this regard.-

Q: Do we have to redo the notification if there is a component percentage component change

A: You have to update the submission if changes in the composition meet the criteria indicated in point B.4.1 of Annex VIII. These include changes in the exact concentration or concentration ranges (indicated in the original submission)-

Q: And in the case of a non-hazardous substance that will be used further in the chain in

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consumer products?

A: The downstream formulator will need the information on all the substances, even the non hazardous ones.

Q: why is consumer use set as first deadline?

A: This was discussed by Member States during the preparation of Annex VIII. ECHA is in charge only for supporting MS in the implementation of the Regulation.-

Q: As Downstream users we buy mixtures and rename them and sell them under our name...private label product. Do we have to notify these products ?

A: No, if the composition remains. See draft guidance linked at: <https://poisoncentres.echa.europa.eu/guidance> by searching RE-BRANDING/RE-LABELLING ACTIVITIES.-

A: Note, the draft guidance reflects the current interpretation of the definition of downstream users and distributors. The interpretation of rebranding and relabelling, which are currently understood as distributors' activities is under discussion.

Q: is there any migrations between local registration center to the poison center?

A: Question has been answered live by speakers during the live session

Q: If the S2S system is only available in late 2019. IS there already a way to prepare our system?

A: Relevant support/documentation will become available in advance of the go live date of version 2 of the PCN portal. Currently the format of the files to be transferred is available at <https://poisoncentres.echa.europa.eu/poison-centres-notification-format> -

Q: We have indeed also a problem regarding inconsistency between composition submitted and the label. We produce feed additives which have a special label legislation. Would this be a problem?

A: Just to clarify, if I understand, the details of the submitter must be consistent with the label. If your product needs to be labelled according to CLP then the additional requirements from other legislations should not be a problem.-

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Q: Good morning, a request to postpone the deadline has been submitted to ECHA by DETIC, AISE in Belgium because it's a huge work for the different companies. Do you have more information? Thanks.

A: This question has been answered by the speakers during the live session

Q: Hello, how to get information of MIM for non European company? for the notification of final mixture. thanks.

Q: If we are an industrial company who sells products to only industrial companies (formulators), can we only indicate the UFI on the SDS (and not on the label)?

A: Yes.-

Q: Will it be possible to ink-jet the UFI's? We have very small containers, as do many other companies - and there is NO room on the labels for everything. In a previous webinar I heard that UFI's can change (based on MiMs UFI's or raw material UFI's) quickly

A: Hi, the Regulation requires that the UFI be indelibly marked, so if ink jet printing does not conform to this, then this would not be permissible. For containers with that are small or

A: awkwardly shaped then a fold out label is possible. Also UFIs can be affixed to the label, like a sticker, if this helps.-

Q: what if the composition is confidential and not provided by the supplier?

Q: How about the requested additional exemptions, e.g flammable only or oxidising only. Any status upgrade available?

A: There are no additional information on these issues. A workability study is ongoing but does not address additional exemptions-

Q: Any new information / status upgrade about the request of several industry associations in

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regards of postpone the first deadline?

A: The question was answered by the live panel.

Q: Will you organize training F2F at MS level or at ECHA?

A: There is already a planned session for MS in early 2019. We will continue to provide support throughout the year, and will consider F2F, but most likely it will be online webinars similar to today's.-

Q: For which mixtures are packaging information requested? Consumers? Professionals? industrials=

A: All mixtures. In case, the product is not packaged, you will need to select option 'not packaged'.-

Q: would you please detail the additional mapping rules (slide 17)

Q: is UFI generator already available?

A: Yes, it is: <https://poisoncentres.echa.europa.eu/ufi-generator->

Q: For MIM if we use raw material (mixture) from different supplier (with different UFI) we have to use different UFI for the same MIM?

Q: Can we notified already national poisoncenter using UFI code and not using PCN portal?

A: We do not know if MS have already adapted their systems to receive notifications with UFI. Please check with the single MS.-

Q: For concentrated food ingredients that are supplied to industrial use but are then converted to food, is notification required and what is the deadline? Food is exempt from CLP

A: Pls see our Q&As, searching with 'food'-

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Q: With the system to sytem, it will be possible to submit mixtures in bulk? Is there a guidance available or to come, for this specific case?

A: With the system to system functionality companies will be able to submit notifications in bulk from their own system directly to ECHA. Relevant support/documentation will become available in advance of the go live date of version 2 of the PCN portal.-

Q: The product identifier stated in the Annex VIII of CLP mentions "authorisation number". What is it?

Q: If I buy the same MiM from two different suppliers, can I provide two UFIs of the same MiM in the notification?

A: No, MiM with different UFIs from different suppliers are considered different mixtures. You cannot know for 100% that they both have the same composition. This issue is known as workability issue and the European Commission is running a workability study to address this problem.

Q: when original mixtures end up in final mixtures which are not subject to submission obligations (e.g. the final mixture is a cosmetic product), what is the final use of these final mixtures to be considered for submission purposes?

Q: If I choose to notify all professional uses products now (ahead of Jan 2020) under national regs, if there is a change in composition (accord to Table 3 annex Viii CLP- would I then update the UFI and notification at Jan 2021 or immediately?

A: Until 2021 national rules apply, so it depends in national rules require you to update in case of composition change. If yes, then you need to update under national rules. After Jan 2021 you must update before you place the mixture as changed on the marked..-

Q: Apologies if this has been already said. But while Cosmetic products don't have UFI or notification requirements under CLP Art 45 is there any way the safety assessment or other Cosmetic Regulation-specific duties might be impacted by this legislation?

Q: Will you make a transcript of the Q&A Chat available like last time?

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Q: Can the IUCLID Format already be used for notification in each Member State before 2002?

A: This depends on the readiness and plans of each local authority. Please check directly with the respective Appointed Body of the Member State.-

Q: Can we add the UFI number on labels before the deadline of 01/01/20 for consumers ?

A: Yes. Just make sure that the information related to the UFI is correct and consistent with the information provided after 01/01/2020-

Q: Can we notify our mixture with 1 UFI when we use different suppliers and thus different UFI's for preparation of our final product?

A: No, not currently. UFI must be assigned to ONE mixture composition. If your components are changing UFIs it is considered as a change of component (even if from your business perspective it may not be the case). The issue is subject to workability study.-

Q: Do Memberstates have the right to ask for more information than stated in Annex VIII ? Or still ask for registration of only environmental hazardous mixtures ?

A: No, only information in context of Annex VIII requirements can be asked for. But it can go beyond mere presence of information (e.g. quality and consistency checks). -

Q: When will the IUCLID6 update for creating PCN-Dossiers be available?

A: If you are referring to the XML format, it is already available here <https://poisoncentres.echa.europa.eu/poison-centres-notification-format> An updated version will be available early 2019.-

Q: Do we need to have a UFI for any packaging size or can we use the same UFI for different packaging sizes like drum and IBC?

A: You can use the same UFI for different packaging. The UFI is related to the mixture composition, not to the packaging. It is up to you if you want to assign different UFI to the same mixture, possibly according to the packaging.-

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Q: How will the Brexit impact the notifications in the UK?

Q: when will we know if the MS only will accept the EU notification ?

Q: how can I proceed in case of re-labelling of our product by a brand company . Are we obliged to give him the composition ?

Q: How to deal with non-classified mixtures (A) which are incorporated into a notifiable mixture (B)? Mixture A doesn't require a notification but partially/fully unknown information, in particular CAS, is required for the notification of mixture B.-

Q: Good morning, please tell us, when the XML format for data transfer will be available?

A: The XML format is already available here <https://poisoncentres.echa.europa.eu/poison-centres-notification-format> An updated version will be available early 2019.-

Q: Hello! Does cosmetic aerosol, such as hairspray, need to be submitted? Cosmetics are exempted but the aerosol can is labelled according to CLP. Thank you!

A: Cosmetic products in their final form, ready for the final user, are not in the scope of CLP. Certain CLP elements are required by the Aerosol Dispensers Directive. CLP Article 45 and Annex VIII do not apply.-

Q: Are the drugs, cosmetic products and complementary feeds concerned by this declaration ?

A: Those medicinal and cosmetic products covered by CLP Article 5 are not subject to this notification. When a complementary feedingstuff can be directly fed to the animal, it is also not in the scope of CLP.-

Q: If my products are based on cosmetic MiMs, how can I declare this MiMs (without UFI) ?

A: I suggest you send your question with more detail to us using our contact forms.

Q: If we are toll-manufacturer, do we have to make these declarations ?

A: Toll formulators are dutyholders, however, contractual agreements can be done between

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them and their customers. See guidance linked
at: <https://poisoncentres.echa.europa.eu/guidance> by searching toll formulator. -

Q: What do you mean with "industrial use only"? Are also professional uses considered?

A: Mixture for professional use means a mixture intended to be used by professional users but not at industrial sites;

Mixture for industrial use means a mixture intended to be used at industrial sites only. -

Q: If we act as a contract manufacturer and our name or contacts does not appear on the label of the products. In this case who must notify the poison centres? Consider that we often don't know the reference markets where the products are sold

A: Toll formulators are dutyholders, however, contractual agreements can be done between them and their customers. See draft guidance linked
at: <https://poisoncentres.echa.europa.eu/guidance> by searching toll formulator. -

A: If you have no information on where your products are sold, we suggest cooperation in your supply chain for this purpose as well. -

Q: The 2025 derogation is valid only in the member states in which I notified, correct?

A: Correct. -

Q: How are classified cosmetic ingredients? consumer or industry uses? they are used by companies that manufactures the final cosmetic and final cosmetics are out of CLP

A: If used in cosmetics industry, as industry use. If the ingredients are supplied to professionals for further mixing before the product is ready to use, professional use. Please check what is a finished product under the Cosmetic Products Regulation. -

Q: any information about fees for notification?

A: The question on fees was addressed by the speakers. -

Q: In what language the information has to be submitted?

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A: The language of the receiving Member State. For details, please see section 4.1 of the draft Guidance.-

Q: Does one need to specify for which member state the product is notified?

A: Yes. You have to notify indicating in which country you intend to place the product.-

Q: If one notifies one product for several member states, does one notify in each language of the member state?

A: Yes. Please see section 4.1 of the draft Guidance for details.
https://echa.europa.eu/documents/10162/23047722/draft_guidance_annex_viii_clp_to_caracal_en.pdf/f1727109-8a8b-5e89-d9ca-8c274a99ab29-

Q: As you may know nowadays we are notifying to Spanish Poison Center. With the new PCN portal, all the notification done before will be conform the new solution?

A: Please contact your national CLP helpdesk for full information. In principle, existing notifications will not need to be re-notified before 1 Jan 2025.-

Q: What about substances that exist in the mixture as the result of a reaction? For example, adduct, polymers, salts? Most of them don't have CAS / EC code. Do we need a CODE for them?

Q: In which section of the SDS must be provided the UFI? Section 1 or Section 2?

Q: What shall I do if I need to notify Mixture containing MIM and I do not know the complete content of MIM necessary in my mixture and my supplier do not want to create UFI for its MIM (because he has later date) and even to tell me complete content of MIM?

A: In absence of UFI, the SDS of the MiM shall be provided, as well as name, email address and telephone number of the MiM supplier. Please note however, that your supplier does not have later deadline, if end-use of its product is your final mixture with earlier deadline (end-use is important). -

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Q: If we are producing a product for which we need to send repairing mixture, but we do not receive full chemical content. How could we make this notification in poisoning center?

Q: If we are using chemical mixtures making articles and we need to send to our customers repairing mixture. Do we need to make poisoning center notification or our chemical supplier?

A: In principle, CLP does not apply to articles therefore no need to notify. Your supplier providing you with the mixture has to notify the mixture used by you.-

Q: How fast the notification of hazardous mixtures through PCN portal will replace notification to individual Member State?

A: The deadlines and the end of the transitional period are defined in the first paragraphs of Part A of Annex VIII. It is not yet 100% certain that all Member States will only use the portal or if they will have other notification means.- This question has been also answered live by speakers during the live session with additional information.

Q: Could a EU third party submit a notification on behalf of a non-EU manufacturer?

A: Yes (but indirectly via EU based legal entity), see draft guidance linked at: <https://poisoncentres.echa.europa.eu/guidance,in particular Section 4.2.5> -

Q: Do we have to submit in duplicate for the Member States that have their own online system for notification of hazardous products?

A: The question was addressed during the live Q&A session. Please check the video recording that will become available in the following days.-

Q: Will it be possible to make the notification via third parties (e.g. service provider)?

A: In principle the submission can be practically prepared and submitted by a third party, but the responsibility remains on the duty holder (i.e. DUs or importer)-

Q: At the end of the transition period there will be no more MS portals?

Q: It is mandatory to put UFI on the label if we already have notified the products

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A: If you have notified under current system, the transitional regime applies. You have until 1 Jan 2025 to comply with Annex VIII. Then, the latest you must notify as required in Annex VIII, and have the UFI on your labels.-

Q: Is ECHA going to make available rules for validation of the dossier to software houses that are developing S2S ?

A: At a first stage the validation of the notifications submitted via S2S will happen upon submission of the files within the portal. Possibilities of making available pre-submission validation checks to S2S users will need to be assessed.-

Q: UFI code must be included in section 2 of SDS or in section1?

Q: Will the notification have any cost?

A: The question on fees was addressed by the speakers-

Q: What about product test samples - do they already have to be notified?

Q: Should the MSDS for finished products be included in all languages ?.

A: Yes. The SDS has to be provided in all the languages chosen when you select the market placement.-

A: Question has been answered live by speakers during the live session

Q: Can we encrypt the data that is sent to the PCN portal ?

Q: If the classification of a MiM changes without impact on our product classification, is it correct that we don't need to update the declaration?

A: Yes and no. You don;t have to do it immediately, as it does not concern final mixture, however you are required by law to have a valid notificaiton at all times, so you should update

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it at your earliest convenience.-

Q: Does IUCLID send directly o the PCN portal or does it have to go though a third party application before ?

A: The user will need to go to the submission page of the portal and upload/submit the IUCLID dossier manually. The ways to prepare a IUCLID notification dossier has been presented during the webinar.-

Q: If the product is no longer manufactured or sold, do we need to update the return ? if yes, how?

A: The first version will not have a possibility to indicate that the product is no longer supplied, but this may be a feature in a later version.-

Q: Is the SDS format will change to include the UFI will be amended with a new regulation?

A: PLease note that there is no specific "format" for an SDS. But information required according to Annex II. The latter is under revision (for other reasons) and the requirements concerning UFI will be clarified-

Q: Should the UFI Code be mentioned on the SDS also?

Q: if UFI is provided for a MIM, why I need to add also known components?

A: MiMs are notified in Member State of your supplier which ma be different from MS where you place your final formulation on the market. MS has access only to UFI information if it has been notified in that MS. -

Q: if formual changes but not the internal code, how we can we generate a new UFI if the internal code does not change?

A: Indeed, if the formulna changes, the UFI has to change as well.Management of internal codes is with your organisation so you can decide internally how to track codes changes.-

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Q: for mixture (MIM) already notified, before deadline, these would have 2025 deadline. what happens if downstream user changes formula where the above is used after 2020. UFI of the MIM is no available. what would be the procedure?

Q: non EU supplier having more EU entities. can one of these entities be allowed to notify on behalf of all?

A: If each EU entity is an importer, then each of them has to notify.-

Q: industrial product but used in final mixture for consumer use (ex.fragrances), should be considered according to Annex VIII as for consumer use. UFI must be put for fragrances on packaging and sds or can be put only on sds?

Q: for fragrances, used as MIM in final products for consumer, is it on-going discussion to notify using only limited submission? (only info on sds)

A: Currently, we cannot provide answers in relation to topics that are under consultation. Personally, I am not aware of any.-

Q: An ingredient of my product is a MiM which is not classified. The supplier of the Mim is not obliged to do a submission of its Mim. How do I insert it in my submission?

Q: Good morning! In case an importer mixes an imported mixture 1 with other components to do mixture 2 which is the one which places in the market, does he have to notify the imported mixture (mixture1) or only the mixture 2 or both?

A: Import is placing on the market. This means you are required to notify the mixture you are importing. You are also formulating a new mixture and a separate notification is required-

Q: How is it defined the professional and industrial use?

A: Mixture for professional use means a mixture intended to be used by professional users but not at industrial sites;

-Mixture for industrial use means a mixture intended to be used at industrial sites only.-

A: Question has been answered live by speakers during the live session

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Q: if Legal entity A produced Substance A - UFI related LE A ; that is used in Legal Entity B to do mixture with A and others substances (marketed by an other --> UFI related) ; Manufacture A should be considered as a Down-stream user in LE B pcn?

A: Hi, Legal entity A has no legal obligation to create a UFI for substances. In this case it would be legal entity B who would be the downstream user.-

Q: If we import substances we are obliged to notify the substances?

A: No. This is only for mixtures.-

Q: All the members states will accept the information provided through the ECHA portal or there are the possibility that some MS use their own system?

A: The question was addressed during the live Q&A session. Please check the video recording that will become available in the following days.-

Q: GASES UNDER PRESSURE ARE EXCLUDED:THIS MEANS LIQUIFIED PETROLEUM GAS (LPG) IS EXCLUDED?

Q: Does UFI have to be on the label or can it be elsewhere on the packaging?

A: Your question will be answered in the upcoming presentations. If you miss the answer, re-send your question before the end of the webinar.-

Q: Can UFI be printed or glued on existing label?

A: Your question will be answered in the upcoming presentations. If you miss the answer, re-send your question before the end of the webinar.-

Q: Can a non-EU supplier notify to Poison Centers?

A: Your question will be answered in the upcoming presentations. If you miss the answer, re-send your question before the end of the webinar.-

A: Sorry. Wrong answer. No, non EU supplier cannot notify. The obligation is for importers and downstream users placing hazardous mixtures on the market. If you are a non EU supplier,

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you have to provide the EU duty holder with the relevant info to notify-

A: Not directly, only via an EEA based legal entity. Otherwise, only EEA based importers and downstream users can.-

Q: should UFI be given in SDS, in all cases or only for industrial use?

Q: If a product is only classified for environmental hazard (e.g. H411) does it need to be notified?

A: No.

Q: Hello, how are uvcb substances to be considered, as a full composition is required?

A: UVCB substances are identified same way you do it for REACH, with a numerical identifier. No need to single out the components of UVCB and their concentrations.-

Q: Good morning, is there clarification if the UFI code must be stated in section 2.2. in the SDS or just on the label/package?

A: The current view taken by the European Commission is that the correct place in the SDS is Section 1.1.-

Q: Can you clarify, if there is demand to notify a pesticide product for professional use, where the national registration/authorisation is withdrawn before 1.1.2021, but the end user is still allowed to use the product?

A: The notification duty applies as long as you as importer or downstream user PLACE the mixture on the market, not whether the end user uses the product.-

Q: If I understood correctly in slide 14 you said that you should need both UFI and all ingredients if you are using mixtures-in-mixtures. Is this correct ?

A: the composition of the MiM has to be provided. If you do not have this information, you can submit the info you have for the known components. For the unknown components, UFI and

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concentration have to be provided. If UFI not available, use SDS of the MiM-

Q: Have all EU countries agreed to use the ECHA notifying portal ? There has been discussions on extra information demanded for some national poison centres in EU. Has this been solved ? Or will we see that we need to register in more systems through out EU?

A: The question was addressed during the live Q&A session. Please check the video recording that will become available in the following days.-

Q: What happens if we use MIMs that have multiple UFIs as cement? The number of our UFIs will be unafordabble

A: This is subject to workability study conducted by the European Commission. Preliminary results will be provided around February 2019.-

Q: If the deadline of our suppliers of MiMs is later than ours, how we will obtain the UFIs of MIMs to do our submissions?

Q: Is it allowed to include the UFI on the packaging or it must be applied on label only?

A: This should be replied to in the webinar. Close proximity to the label can suffice.-

Q: The components of a MiM to be notified are the ones disclosed in the Section 3 of the SDS?

A: In case you do not know the full composition of the MiM, you can indicate its UFI and known components which indeed can be those indicated in the SDS-

Q: In case non-hazardous detergents must be notified according to the local regime, could the ECHA portal be used for this purpose?

A: Indeed, as answered online, the ECHA portal could be used for this purpose as a 'voluntary' submission i.e. it is not mandatory according to Annex VIII-

Q: Hi, good morning. we are formulators. What happens if one supplier does not disclose their Chemical ID and does not supply the Mim information?

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A: In absence of UFI, the SDS of the MiM shall be provided, as well as name, email address and telephone number of the MiM supplier.-

Q: MiM: Did I understand correctly that you only have to submit known substances according to SDS?

A: If components of the MiM are known, you have to provide information on them. If they are not known, SDS of the MiM shall be provided as well as name, email address and telephone number of the MiM supplier-

A: Please note that you must make effort to obtain this information. Enforcement may ask you for proof that you really cannot have this information.

Q: If the supplier of a MiM is not providing formulators component disclosure and tdo not have performed a submission of harmonised information to Poison Centres. How long can formulators make notification only submitting the MiM SDS?

Q: How will a formulator be able to submit harmonised information if a mixture contains a MiM and the supplier of MiM only provides a SDS and no UFI?

A: If UFI is not available, the SDS of the MiM shall be provided as well as name, email address and telephone number of the MiM supplier. In principle, communication among the supply chain has to be encouraged.-

Q: Which countries will accept notification through the ECHA portal? Is there any country that has indicated they will require notification in a country specific portal?

A: Question has been answered live by speakers during the live session

Q: the submitter details consistent with the labelling is the distributor in our case.

Q: Who should do the submission in this case?

A: The present understanding is that the formulator would submit the information in all countries where the mixture is placed on the market. The distributor could do the submission on behalf of the formulator.-

Q: the formulator of the distributor?

Q: can we easily swith between PCN declaring exact composition to notification declaring ranges?

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A: Yes it possible to update your submission replacing the exact concentration with a range. Validation rules will check the two match-

Q: without changing the UFI?

A: Yes-

Q: Do the products contained in a group submission need to have different UFIs?

A: No, all products included in a group submission can have the same UFI-

Q: Is the preparation tool already available?

A: The guided dossier preparation tool is under development and will be available in V1 of the Poison Centres portal. -

Q: can the UFI be embossed to the packaging? Does it need to have a dark coloured ink?

A: Please remember that the text must be easily legible. Embossing is not ruled out, but it might not stand out enough from the container in an emergency. -

Q: Deodorants for skin in aerosol form are labeled with CLP phrases like H222, H229, but they are cosmetics: can you confirm that they do not need UFI nor Annex VIII notification ?

A: Cosmetic products in final form, ready for final user are out of the scope of CLP and thus also not subject to the requirement to submit information under CLP Art 45. So, no notification, no UFI.-

Q: are mixtures only classified EUH208 also out of scope?

A: Yes, they are.-

A: EUH is not a classification, but a labelling requirement without classification.-

A: Question has been also answered live by speakers during the live session

Q: Good morning; Does the deadline for "consumer use" also apply in case the chemical is a raw material that will be used in further in the chain in consumer products? Who in that case needs to notify?

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A: Yes, if the raw material is a mixture. Both formulators of the original and final mixtures have to notify.-

Q: If we act as a contract manufacturer and according REACH definitions we are the downstream user however our name or contacts does not appear on the label of the products. In this case who must notify the poison centres?

A: The toll formulator has the obligation to notify unless contractually agreed otherwise.-

Q: IF WE ARE IMPORTERS/DUs FOR ADDITIVES USED INSIDE THE INDUSTRY (OWN USE-NOT PLACE ON THE MARKET). ARE WE OBLIGED TO NOTIFY THESE ALSO??

A: Import is considered as placing on the market (under both REACH and CLP). Thus, yes you do need to submit the information.-

Q: In case of derogations from labeling for "Metals in massive form, alloys, mixtures containing polymers, mixtures containing elastomer", Is it sufficient to print UFI on SDS or is it necessary to print it on the label?

A: On SDS, if 1.3.4.1. of Annex I to CLP applies (no label & no hazard to human health by inhalation, ingestion or contact with skin)-

A: If there is a label, UFI goes there also.-

Q: For cosmetic ingredients: they are intended for industrial use but will be found into consumer products; since finished cosmetic products are exempted from notification, is the exemption applicable to ingredients too? If no: what is the deadline? Thanks

A: The exemption on cosmetic products applies only to the final stage. At industrial use stage the ingredient mixtures are subject to CLP and to the requirement to submit the information. The deadline is the one for industrial use.-

Q: Are mixtures only classified EUH014 or EUH066 out of scope?

A: THE EUH sentences are not a classification but a labelling requirement. Thus no, mixtures labelled only with EUH are not covered by CLP Article 45 and Annex VIII.-

Q: In terms of scope of the notification, does it cover a cosmetics product which is classified for human health e.g. irritant?

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A: Cosmetic products in final form, ready for final user are out of the scope of CLP and thus also not subject to the requirement to submit information under CLP Art 45. So, no notification, no UFI.-

Q: Does the UFI number have to be printed on the samples sent for testing?

A: No, I does not sound like this would be a requirement. -

Q: When will industry know if a member state is requiring separate notification?

A: We are working with the MSs to clarify when they will be ready and whether they will accept notification via the Central Portal-. Please note that it will never be required to do 'double' notification, only one, via central portal or to national portal.

Q: if MS will keep their portal active and will not accept the unique notification, should we notify double?

A: No, you can choose if you go for central or national portal. No need to notify in both places.

Q: Again, my Q 10:12. How about the consideration of additional exemptions from PCN like explosives e.g only flammable or only oxidising compressed gases, implement ranges to make PCNs easier and simple?-

Q: Is the UFI number required to be printed on all layers of packaging?

Q: If we make the notification on a Member state portal, is our notification available for all EU Member states?

A: No.

Q: YES FOR IMPORT OK WE WILL SUBMIT.FOR THOSE AS DOWNSTREAM USERS AND HAVE ONLY OWN USE I SEE NO OBLIGATION.IS IT CONFIRMED?

A: No need for submission since there is no placing on the market.-

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Q: Do you have information concerning the fees which will be applied by the member states?
thanks.

A: This question has been replied by the panelist during the InfoSession.-

Q: Our private label companies don't want the end users to be able to trace using the label
on the product by which company this product was manufactured. How does PCN/UFI
guarantee this confidentiality?

Q: Is UFI considered a part of Product identifier or is it a supplementary information?

A: We understand that this would be considered supplementary information but this
interpretation is likely to change to fit with the product identifiers-

Q: will be possible to notify all products, using one legal EU entities, and valid for all EU MS?

Q: What is the reason to provide the submitter details consistent with the labelling? How is
the submitter (formulator/downstream user) distinguished with the company mentioned on the
label which is the distributor in most cases?

A: The issue is known and Commission proposed amendment of Annex VIII in this context.
Currently distributors are not considered duty holders.-

Q: We put trade names on substances and put them on the market. Should we declare them

A: Substances are out of scope for notification purposes according to Annex VIII-

Q: Can the UFI be added to the label before the submission is validated?

A: It is possible, but both the UFI labelling and UFI in the notification should be timed to
coincide as much as possible.-

Q: if a company places on the market a non classified mixture for which the composition is
confidential. The a DU formulator mix it and it becomes a classified mixture. the DU formulator
will need the composition of the original NC mixture. What then?

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A: You could ask your supplier to submit a voluntary notification and provide you with the UFI (supplier does not need to put UFI on the label, only make the notification). You can include this UFI in your notification-

Q: will the submitter details be used as primary contact for the poison centres?

A: Poison centres will use as main contact the one related to the label. Only in case of industrial products (limited submissions), a telephone available 24/7 has to be provided, with rapid access to additional product information.-

Q: How non-EU manufacturers can include a UFI number on their label or packaging if they are not allowed to submit notification? Can they obtain a UFI number even if they do not submit a notification?

A: Non-EU formulators can make voluntary notification via EU based legal entity and then provide UFI to you. -

Q: if non eu importer doesnt have obligation to notify- is this true for their Only representative?

A: There is no OR concept under CLP regulation.

Q: could you precised when the format will be updated on the website : at the moment, release PCN format (version 1.0, published on 30 April 2018); when the v2 will be release?

A: An updated version of the format will be available early 2019, before the release of V1 of the portal. V2 of the portal will be released in November 2019.-

Q: The cosmetic product final are not included of the CLP but could you confirm/tell if we sold some pre-mix of cosmetic ingredients for the DO IT YOURSELF/HOME MADE cosmetic product are included or not by the CLP scope and also the the notification ?

A: This should be checked from the authorities on cosmetics.. In principle, the exemption applies ONLY to product in FINAL form, ready for final user.-

Q: how the DU formulators will declare the full composition without knowing the original composition?

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Q: in a notification do we have to specify the member states in which the product is intended to be sold? Thank you

A: Yes, you have to indicate in which country you want to place the product.-

A: Question has been also answered live by speakers during the live session

Q: After submitting an UFI incl compositional information @ ECHA as a producer of hazardous mixtures, can we give our (professional) customers this UFI and have them submit them the packaging/UFI combi per country?

Q: WE SELL TO DISTRIBUTORS WHO SELL TO THEIR CUSTOMERS BUT DUE TO CONFIDENTIALITY AGREEMENTS WE DO NOT KNOW THEIR COUNTRIES.OUR SUBMISSION WILL BE ONLY TO THE COUNTRY OF THE DISTRIBUTOR???

A: No,in all EU Member States,unless there is a contractual agreement between you and your customers.However,you,as a dutyholder remain responsible.See Section 3.1.1.1 of the draft guidance linked at:<https://poisoncentres.echa.europa.eu/guidance->

Q: In case a MIM was addressed by a SDS as no UFI was available, are the MS allowed to request the complete composition from the supplier stated on the SDS during the transition period? Is this in accordance with CLP Annex VIII?

Q: in case of S2S notification, will be possible to submit in xml format?

A: The format of the notifications is already available here <https://poisoncentres.echa.europa.eu/poison-centres-notification-format> . An updated version will be available early 2019.-

Q: Do authorized biocide product (BPR) require also a CLP notification? Classification will be publicly available once authorized

A: Yes, they do.-

Q: As there are still so many open questions, do you expect that all companies will have registered all Consumer products prior to 1/1/20?

A: We are aware of the open points and tight deadlines, however the deadlines for notification have been set by the Regulation. ECHA remains committed to provide support to facilitate

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compliance.-

Q: If we use IUCLID to create the dossier, will we have to create individual dossiers in specific languages?

A: If submitting via the ECHA portal users will have the possibility in one IUCLID file to indicate all the countries that the product is placed in and provide in the same file the relevant information in the all the repective languages. -

Q: are there any fee to pay for notification?

A: This question was replied by the panelists during the InfoSession.-

Q: Are the raw materials for Drug preparation concerned by this declaration ?

Q: What about substances that exist in the mixture as the result of a reaction? For example, adduct, polymers, salts? Most of them don't have CAS / EC code. Do we need a CODE for them?

A: The identification of the components is accoridng to Art. 18(2) CLP. It envisages cases where numerical identifier does not exist.-

Q: You can have multiple suppliers for 1 MIM (raw material) and receive multiple UFI numbers. How do we deal with this, if you have 10 raw materials in a recipe and all have 2 possible suppliers you have 1024 UFI number.

A: The issue is being addressed by the EU Commission workability study. -

Q: As there is a very short time for notification end of 2019 to comply with consumer deadline jan.2020. If you use MIM-UFI which has not been notified by your supplier. Will our submission fail?

A: Yes it will-. Please note that 2020 is not a deadline, but step-wise applicate date for all the new products. Old products existing on the market should be notified under national system.

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Q: How much will the submission cost?

Q: Having to submit in all languages where mixture will be placed on the market gives commercial sensitive information and may even violate competition law?

Q: A salt diluted in water is considered as mixture or not? if the hazardous information has already disclosed in SDS section 3. thank you.

Q: when there will be an official position of member states about the acceptance of central portal? This position will be also published on ECHA website? will some member state require double notification to ECHA and to local portal?

A: The question was addressed during the live Q&A session. Please check the video recording that will become available in the following days.-

Q: Fragrances (MIM) who end up in detergents products can be considered " for industrial use " ?

Q: What about Liechtenstein: so far, they refer to the Swiss PIC, but Switzerland, as not being part of EU, will not have access to the ECHA database. Still, Liechtenstein needs to follow annex VIII. Will Liechtenstein install an own PIC or switch the PIC?

A: Discussion between Liechtenstein and the EU Commission regarding this topic is ongoing.-

Q: When submitting via the ECHA portal, the language issue would be reduced to free text input right? Texts that are related to options, will be generated by the system in the respective language, correct?

A: In V1, only the toxicological information will have to be provided in the language of the country where you want to place your product (the system will support this functionality). In V2 the system will be itself available in multiple languages.-

Q: Are there any special requirements for plant protection products?

A: No, plant protection products are treated similarly to other mixtures in scope of Annex

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VIII-

Q: So if it has to be in different languages you have to notify each product separately in each country? So these are all different submissions?

A: If submitting via the ECHA portal users will have the possibility in one IUCLID file to indicate all the countries that the product is placed in and provide in the same file the relevant information in all the respective languages. -

Q: If a Raw Material supplier does update their MiM UFI number, is it correct that this change in UFI must be considered as a component substitution in our product composition and therefore we need to update our declaration?

A: It depends. If the supplier changes UFI due to commercial reasons, you don't. But if the change of UFI is because the supplier changed the composition, then indeed it affects your mixture and your UFI.-

Q: If a product is manufactured by a company A on the request of a company B and if this product is delivered to company B. Which company is obliged to make the notification first?

A: Toll formulators are the dutyholders, however, contractual agreements can be done between them (company A) and their customers (company B). See draft guidance linked at: [https://poisoncentres.echa.europa.eu/guidance by searching toll formulator](https://poisoncentres.echa.europa.eu/guidance%20by%20searching%20toll%20formulator).-

Q: UFI on MSDS : section 1 or 2 with labelling ?

A: 1.1-

Q: Is it allowed to give UFI in all SDSs, and not only when mandatory ?

A: Yes.-

Q: Will it be possible to make the notification via third parties (e.g. service provider or private label suppliers)?

A: Yes, it will, based on a contractual agreement and provided that the importer or downstream user remains the dutyholder.-

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Q: Since it is a labelling (UFI) requirement - many SDS software systems already have the section in section 2.2

A: We are aware of this issue and are waiting for the final outcome concerning the Annex II revision.-

Q: Having to submit in all languages where mixture will be placed on the market gives commercial sensitive information and may even violate competition law?

A: Not sure if we understand the concern. Already nowadays notificaitons are made to Member States in their languages and SDS are being provided in relevant languages. Why would this be matter of competition law?-

Q: Assumed a non hazardous MIM as a component in a haz. product to be notified. For such a MIM a UFI would be required. However as the material is non haz., the supplier won't be obliged to notify his product and so no UFI would be available. What to do?

A: No, he wont be obliged. Your options could be enter into additional discussions with the supplier to gain this information, or it is possible that the supplier can make a voluntary submission with this information and you use the UFI.-

Q: If we make a notification of a private product in a country for a customer, which VAT number we have to use? the responsible company to put the product on the market or us as a manufacturer.

A: In principles the VAT of the duty holder should be used-

Q: It was mentioned that the UFI need to be on the SDS if it cannot be on the packaging. Can it as well be on the SDS if it is as well on the packaging?

A: Yes.-

Q: If all components should be listed in the dossier, how to handle UVCBs? Is a UVCB considered to be 1 component?

A: Yes

Q: When suplier of MIM gives me UFI of his MIM shall be this MIM first notified to central portal before I notify to central portal my own mixture containing MIM identified by UFI (when I do

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not know complet composition of MIM)?

Q: How shall the UFI be communicated in the supply chain for products with consumer end use if the current product will be used as MIM in the end use product?

Q: For mixtures which are intended for industrial use it is not mandatory to include the UFI on the label provided it is indicated in the SDS. This includes industrial mixtures that are further formulated into 'final mixtures' for consumer or professional use

A: Yes, it is correct. But the UFI has to be placed on the label for the product further down the supply chain-

Q: Should a new UFI being generated for each change in formulation even if no change in classification?

Q: coming back to the "on behalf of", in case goods comes from non EU supplier but becomes EU goods fiscally. the non EU Company has different EU legal entity, if we want to do a unique notification valid for all MS, can we choose one EU legal entity to do?

Q: how long can products remain on the market without having an UFI? Do I understand correnctly that as of Jan 2025 all newly manufactured products need to have the UFI and the "old" products can be sold out?

A: All products sold after 1 Jan 2025 must have the UFI, not only newly manufactured ones. Thus, re-labelling or other means of adding the UFI will be required.-

Q: Do we need to add the UFI to products that are in the supply chain already after 2025?

A: Yes.-

Q: Can we notified in 2020 national poisoncenter using UFI code in case of issue with Echa portal?

Q: If I choose to notify all professional uses products now (ahead of Jan 2020) under national regs, if there is a change in composition (accord to Table 3 annex Viii CLP- would I then

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update the UFI and notification at Jan 2021 or immediately?

Q: I believe the question on registrations in on national product registration contra registration to the poison centres.

Q: If we have to change the formula and need to change the UFI on the label, is there a timeframe given for making the change?

A: When an update in accordance with point 4.1 of Part B of Annex VIII is required, this must be done 'without undue delay', however when it comes to UFI, new UFI must be on the label and notification made BEFORE placing the mixture as changed on the market.--

Q: Do we have to continue to declare at national level after the european notification ?

A: It is still a national notification, you only use a central portal to submit the information to each member state.-

Q: But if the UFI is not on the SDS, how can I know that my supplier has updated the UFI of a MiM?

Q: When can we start to submit information to the poison center?

A: V1 of the portal will be available in April 2019. Please check with national authorities if they will be ready to receive the information provided through the portal.-

Q: When we can start notify in PCN new system as voluntary?

A: Our PCN portal will be released in April 2019 and will have this functionality. However, it remains to be seen which MS will be ready to accept them.-

Q: Will the new centralized notification be sufficient to insert the different national emergency telephone numbers in section 1 of the SDS?

A: Yes, you will be able to add as many contact details as needed-

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Q: Are the MS allowed to ask for harmonised notifications including UFI for non-hazardous mixtures?

A: For voluntary notifications of non-hazardous mixtures ECHA and MS agreed that only compositional information rules must be followed. And in case this mixture becomes MiM for further formulation, also UFI must be present. Everything else is voluntary.-

Q: May importers use only information from SDS to submit notifications of non-EU supplier products?

A: Importers are required to comply with all CLP requirements, not only Article 45. Therefore certain information should be available to them. Nevertheless the draft Guidance suggests a possible work around in case of communication problems-

Q: Can you explain to us, please, what are the differences between industrial and professional user?

Q: There are a lot of EuPCs available. Are the REACH PCs going to be harmonized with them?

A: It has been answered live by the panel.-

Q: There will be information on which MS will accept only the notification to the European portal if we put on the market a product to their MS?

A: Question has been answered live by speakers during the live session

Q: If the classification of a product changes but the formulation remains the same must we update the notification?

Q: LPG IS EXEMPTED?

A: Petroleum sector is subject to EU Commission workability study. Currently not exempt-

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Q: Can we put the UFI on the label if the notification is not yet done. meaning there is no information behind. what is your advice; thanks.

Q: We are contract manufacturer. Do we need to notify or our client?

A: You need to notify.-

Q: Will all Member States use ECHA's centralized system or will some use their own submission and submission system?

A: This question was answered by the panelists. It is up to each MS.-

Q: What with multilingual support while using IUCLID?

Q: Is Group submission possible for paints if they have the same classification and differ only in the dye?

A: The GS is possible when criteria indicated in A.4 are met. Mixture compositions can differ only for perfumes or/and fragrances-

Q: In case we source a raw material from a different Supplier..does this change trigger the need for a notification update?

Q: could we use the UFI of the importer instead of the components of the mixture?

A: Yes, you could use the UFI of the importer, but you would still need to list all the known components e.g. from the safety data sheet. This is to assist poison centres in the event of an emergency.-

Q: Could a headquarter notify in the name of a national subsidiary?

Q: Can you please explain how confidentiality of information can be ensured to protect trade secret information? Especially where both hazardous and non hazardous composition

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information is required.-

Q: Has my supplier the duty to notify me when his UFI changes?

Q: Can you group mixtures under 1 UFI or does each mixture have their own UFI?

A: Grouping of mixtures is only allowed in certain cases. In the case where this is allowed, the same UFI can be used for all mixtures.-

Q: Is there any further information regarding Distributors who place a formulation (by others) on the market under their own trading name and brand as to who should generate the UFI and notify

Q: Is the section 3 of the SDS should indicate the UFI of the displayed components provided by the suppliers (like reach numbers) ?

Q: MIM are raw materials for UA industriels - So MIM are UFI in 2024 ... so for our declaration of product (before 2020 or 2021) with MIM, we can't indicate UFI for our MIM ...it is a problem.

A: The use of MiMs is determined by end-use. So, in this case, if MiMs you mentioned are not industrial. -

Q: Any discussions for Annex VIII about additional possible exemptions from PCN

A: The COMmission is undertaking a workability study looking at the specific problems in some sectors. Whether this would lead to additional exemptions remains to be seen. The outcome of the workability study will be available by mid 2019.-

Q: What is the status of the feasibility study? Any further information on petroleum products and coloring agents?

A: The preliminary results are expected to be presented in February by the EU Commission.-

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Q: what does mixutre in mixture mean? Is this explained in annex VIII?

A: Mixture in Mixture's definition is available in Annex VIII, Part B, section 3-

Q: What about securitx of submitted data ? If APs orPCs are going to have local copies of the submitted information how is secured that all recipients comply with ECHA standards regarding data safety ?

Q: flavours are considered "industrial use" if used into foods, is it the same if they are used in cosmetics (toothpaste for example)?

Q: Companies will be obliged to submit much tighter mixture composition percentages than it is communicated on SDSs. How is it ensured that this company confidential information is not disseminated or abused by third parties?

Q: If a substance is defined in Annex VI as "aqueous solution...%", how are commercial aqueous solutions of this substance (without additional components) considered? A mixture or a substance?

Q: Do we need to submit notification for non-hazardous mixture as well?

Q: What to do if our supplier (outside EU) does not want to share the full composition? Is there any way to make a partial notification?

Q: could we use the UFI of the non EU supplier instead of the componets of the mixture?

Q: What is the consesquence of the BREXIT if we buy MIMs from UK? thanks.

Q: Is it possible to notify, for a same product, a % with MiM and the other % with CAS/EC codes?

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Q: If the S2S system is only available in late 2019. IS there already a way to prepare our system?

Q: We have indeed also a problem regarding inconsistency between composition submitted and the label. We produce feed additives which have a special label legislation. Would this be a problem?

Q: So if it has to be in different languages you have to notify each product separately in each country? So these are all different submissions?

Q: make an example for toxic information to be notified

A: Toxic info is the one available in section 11 of the SDS.-

Q: For a paint composed of many things + 3 pigment concentrates (MiM), produced within our company. How many UFI do we need and what is needed on the label? Only 1 for the paint, or 1 for the paint and 3 for the MiMs?

Q: During the webinar in April you pointed to section 15 as the one where UFI for industrial should be mentioned and subsection 2.2 for consumer use product. Now it is section 1 for industrially used products. Is it the final version or is it going to be changed?

Q: Could you repeat the answer about fees?

A: Fees are up to each member state. No fee will be applied by ECHA.-

A: Question has been also answered live by speakers during the live session

Q: Which IUCLID version is compatible with notifications? Are new versions of IUCLID expected?

A: The last available IUCLID version can be found here
<https://iuclid6.echa.europa.eu/download->

Q: Can we ask for a non-European company to get UFI in order to permit our notification?
thanks.

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Q: Will there be a confirmation provided by each MS to a notification and will this be communicated through the ECHA portal or direct to notifier?

A: Once you submit through the ECHA portal, you will have access to your submission report. There, you will be able to see the confirmation of your submission and the confirmation that the MS has received the notification.-

Q: Do we have to submit a notification for samples?

A: Notification obligations do not apply to mixtures for scientific research and development. Otherwise notification obligation applies-

Q: If a product consists of 2 mixtures (e.g. 2 components of an adhesive) which are mixed by the user: do both components need to be registered separately and do they each need an own UFI? Or is it enough: 1 registration and 1 UFI for the complete product?

Q: I am a bit confused: it was said that if a mixture is for industrial use but ends up in consumer products, the deadline is 01/01/2020; can you confirm that this deadline is NOT applicable to cosmetic ingredients?

Q: Does a company has to wait until the finishing of the verification process by ECHA before bringing it on the market?

Q: What about the language of the components that we need to declare ?

Q: Hello, do you know an overview on member states sanctions in case of default of antipoison notification ?

A: Hello, we have not done such an overview-

Q: UFI: For what concerns label exemption from Article 31, point 1.5.1, The label on the inner packaging shall contain also UFI (it is not indicated in point 1.5.1.2) or it is sufficient to put it only on the outer packaging?

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Q: Who needs to notify: the registration holder (1 UFI in the EU) or the local distributor (1 UFI in each country)? (Sorry, I missed the introduction). Thank you.

Q: For a paint composed of many things + 3 pigment concentrates (MiM), produced within our company. How many UFI do we need and what is needed on the label ? Only 1 for the paint, or 1 for the paint and 3 for the MiMs ?

Q: When do you envisage the version 1 will be released and the portal open and available for submissions?

Q: Hellow, for the free text fields that need to be in the languages of the member states that you are placing the product on the market do you include all the translations in the one submission?

Q: is there any timeframe to update already existing labels/ manufactured batches with UFI?

Q: I guess it was already mentioned before I joined the webinar (issues connecting): When will the Guidance for Annex VIII be available?

Q: You mentioned a list of member states accepting notifications in English. I checked the Poison Centres Website, but I cannot find the list.

Q: If the ingredients do not fall within one of the concentration ranges indicated in Table 1 of Annex VIII or fall outside the indicated width, what should we do? How to submit notification in that case?

Q: Does a change only to the environment classification generate an update of the declaration ?

Q: If we create a new packaging of a formula already declared, is it correct that we don't need to update the declaration?

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Q: When will we know the date when member states are ready to receive notifications made to the ECHA PCN Portal?

Q: a toll manufacturers produces our products with our label. if toll manufacturer needs to notify our product (apparently that is the idea), can we provide our ufi to toll manufacturer? or can we add both the name of toll manufacturer and our company name in the same notification?

Q: Can we declare a formula in 2 times

Q: If a submission is done to ECHA in english, we still have to submit in ALL the languages of the countries where the products are sold?

Q: Is there the possibility to attach the SDS of the supplier in the notification if he does not provide neither the UFI nor the complete composition of the MIM?

A: Yes, until 2025.-

A: However, have a proof that you tried to get the info. Enforcement may ask for it

Q: Will there be a confirmation provided by each MS to a notification and will this be communicated through the ECHA portal or direct to notifier?

Q: UFI: for products already placed on the market which will remain on the shelves of distributors after the 2025: they will have to be re-labeled/withdrawn for adding UFI, or can continue to be sold by distributors even if without UFI?

Q: why is toll manufacturer duty owner if they do not own the products produced? toll manufacturerf does not know in which countries we as owner of products sell the products. how to solve?

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Q: Is my question about pigment concentrates out of scope ? They are MiMs so I presume there must be a notification. But, if 3 of them are used in a paint, do we need to have 4 UFIs on the label, and do we need to make another declaration for the paint with s

Q: Has my supplier the duty to notify me when his UFI changes?

Q: If we only commercialize our mixture in one member state and this member do not agree with ECHA notic

Q: if our costumer is placing the product in the market for consumer use, then the costumer is the one that should submit the information to the central notification portal. From our side should be enough if we provide to the costumer the SDS, email address

Q: For mixtures intended for industrial use it is not mandatory to include the UFI on the label provided it is indicated in SDS. This includes industrial mixtures that are further formulated into 'final mixtures' for consumer/professional use?

Q: should one report to the Poison Control Center of the Member State and the ECHA poison control center?

Q: If my products are based on cosmetic MiMs, how can I declare this MiMs (without UFI) ?

Q: We know full composition, but have several suppliers of (PURE) raw materials. Can we generate only ONE UFI for a given recipe, or do we HAVE to use supplier UFI as we generate our own? This was only answered regarding MiMs (we know comp. by CAS no,)

Q: Good morning, could someone explain to me what mixture in mixture means?

Q: Can a mixture be sold in different formats, different MS and different commercial names with the same UFI? Otherwise, can I generate more UFIs for the same mixture sold in different MS with different trade names?

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Q: The transitional period applies to all the mixtures already notified nationally or to the existing mixtures that will be notified in the first versions of the PCN (from april 2019)?

Q: Do we have to continue to declare at national level after the european notification ?

A: The question was addressed during the live Q&A session. Please check the video recording that will become available in the following days.-

Q: Please let me know the deadline and use (industrial or consumer) for fragrances compositions that are intended to be used at the industrial use for consumer products. thanks

Q: If we only put on the market of one member state our mixture and this member does not agree with ECHA notifications (extra requirements). Do we need to notify in ECHA Portal too or only in the Portal of the member state?

Q: If a mixture ends up in a non-hazardous consumer product, what is the notification deadline for the upstream supply of initial (hazardous) mixture to industrial manufacturer of the final consumer goods?

Q: Do national affiliates of multinational groups have to notify in the ECHA PCN only locally produced mixtures related to the same COR commercial product? Do they have to put on the label their own UFI?

Q: why is the numerical part of the UFI limited to 268 435 255 instead of 999 999 999? We have internal numbering in the range 600 000 000 and up. Do we have to generate another internal for this then?

Q: Do we need to add the UFI to products that are in the supply chain already after 2025?-

Q: Is Group submission possible for paints if they have the same classification and differ only in the dye?

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Q: In industrial company's belonging to the same group and having a centralized SDS tolls, the portal allows that submission to poison centers can be made centrally?

Q: A sticker (with UFI) does not help - as it would probably cover the rest of the already full label. I understand indelibly... so ink jet might work. Can UFI be "within a fold out" or should it be FRONT as everything else?

Q: in this case all the information is given to the centralized system that issues SDS in the name of all the other group companies

Q: the issue is that we could be having a centralised company doing other group companies submissions

Q: Regarding my questions on the labelling of feed additives. Sometimes we don't have declare everything on the label according to the feed additive labelling legislation. So the inconsistency will remain.

Q: Should the UFI code also be put on a overpack (eg cardboard box) which contains the bottles with product?

Q: Mixtures like hydroalcoholic extractions and other that are sold as raw material for the FOOD industry, but are sold in bulk not in the final state for the consumer, need to be notified, it is correct?

Q: :) ... should be ... correct. But if this system is intended to advice emergency response personal in a hectic situation, a clear advice from the poison centers would be wellcome. Could it therefore be usefull to have some "standart treatment procedures"?

A: Sorry to say, but this is not up to us... The European Commission and the Member States determine the legislation. I'm sure your national authority for emergency response would be happy to discuss the issue!