





#### Welcome!

Part I - 10:00-11:10 (streamed live)

- Poison Centres notifications Regulatory update
- Prepare and submit using ECHA tools
- Foreseen changes

Short break 11:10-11:30

ECHA Submission portal: introduction to the training

**Part II - 11:45-16:00** (not streamed live)

Training exercise (I)

Break 13:00-13:45

- Training exercise (II)
- Close





#### **Practical info**

- Wear your badge
- WiFi password: GuestW1F1
- Coffee served in the lobby 11:10-11:30
- Lunch (own cost) outside or ECHA restaurant 13:00-13:45
- Drinks, except water, or food are not allowed in the conference room
- Request for taking floor is done by pressing the microphone button on the panel in front of every seat



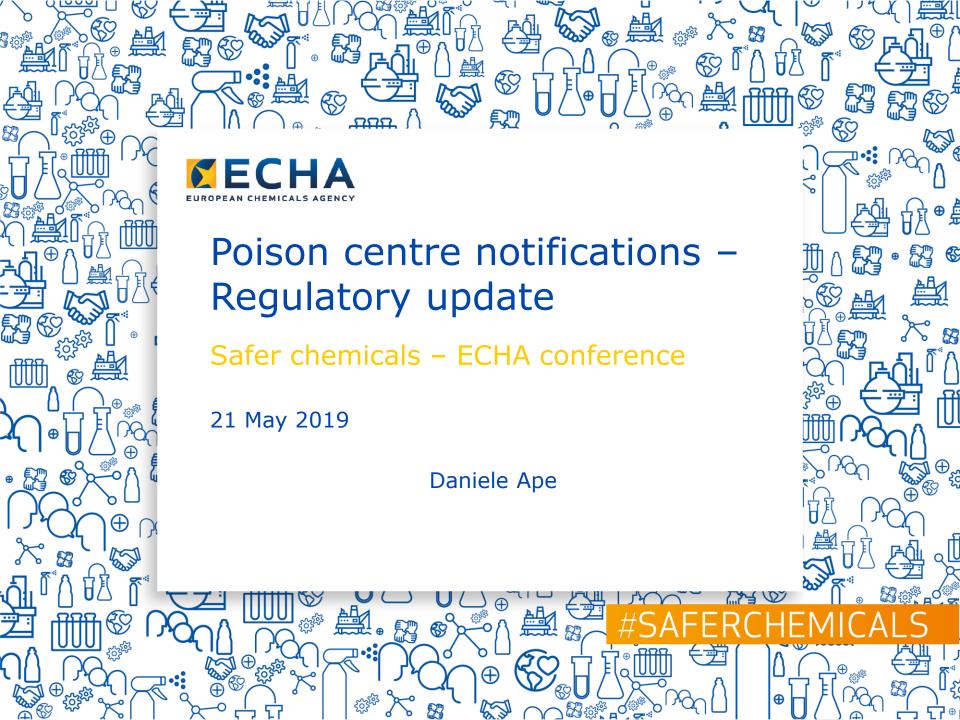




#### **Practical info**

- Smoking: ground floor, take elevator to your left as you leave the room
- Toilets are located on the same floor on the left as you exit
- In case of emergency, follow green exit signs and assemble in the park outside

echa.europa.eu







#### **Table of contents**

- Background Article 45 and Annex VIII
- Duty holders who?
- Timing when?
- Information requirements what?
- Action points and key messages

# Background - Article 45 and Annex VIII





#### **Article 45 of CLP**



"Member States shall appoint a body... responsible for receiving information ... for formulating preventative and curative measures, in... the event of emergency health response, from importers and downstream users placing mixtures on the market. This information shall include the chemical composition of mixtures...classified as hazardous on the basis of their health or physical effects [...]"



- Different information requirements in each Member State
- Different submission systems
- Issues with identification of poisoning agent/mixture

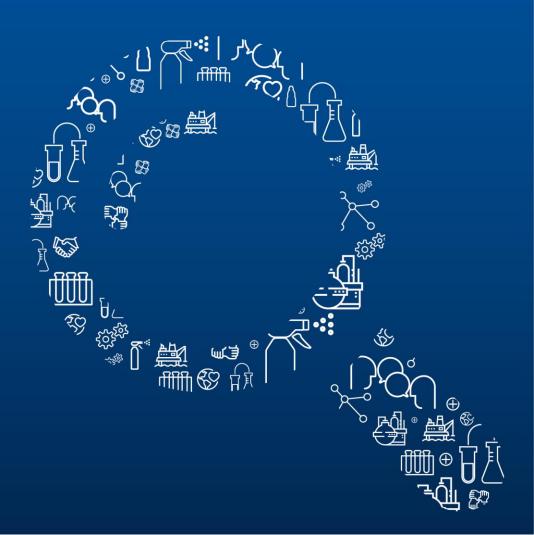




#### It's about harmonisation

- Same information requirements in all EU Member States
- Preparation of data in a harmonised format
- Submission of data possible via central system (ECHA portal) [Optional]

# **Duty holders - Who?**







#### Who has submission obligations?

- Companies placing mixtures on the market (before!)
- Mixtures classified as hazardous on the basis of their health or physical effects
- → In each Member States where the mixture is placed on the market

#### NOT:

- Substances
- Mixtures not covered by CLP
- Mixtures classified <u>only</u> for environmental effects
- Mixtures used for R&D; PPORDs
- Gases under pressure
- Explosives (unstable explosives and divisions 1.1 to 1.6)

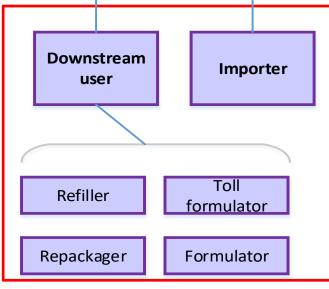


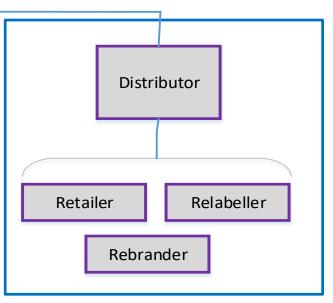


Duty holders under Art.45

Operators in the supply chain

Potential duty holders under Art.4





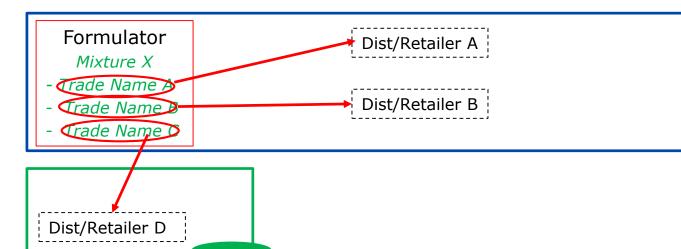
**Article 45** - Direct obligations → Importers/Downstream user

**Article 4(10)** – Mixtures placed on the market have to be CLP compliant → All actors (*including distributors*!)

Shared responsibility to prevent non-compliance (i.e. Annex VIII information available to relevant ABs)







(Art.45) **Formulator** submits to appointed bodies in:

Member

State 2

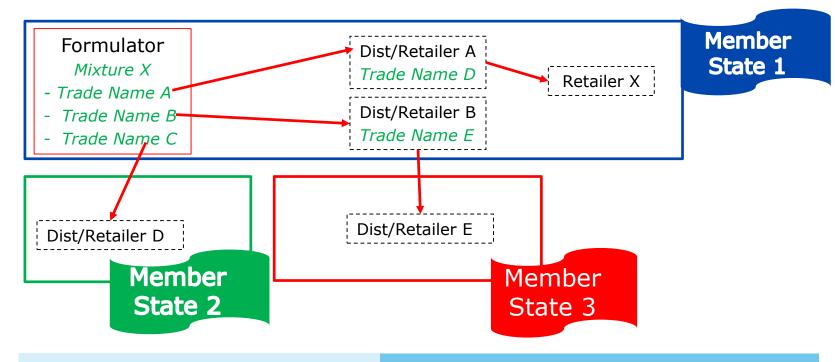
- Member State 1: Trade Name A and Trade Name B
- Member State 2: Trade Name C

Member

State 1







(Art.45) **Formulator** submits to appointed bodies in:

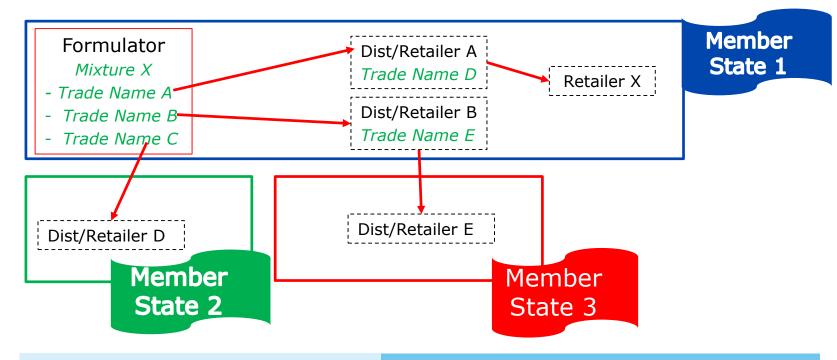
- Member State 1: Trade Name A and Trade Name B
- Member State 2: Trade Name C

(Art. 4(10))

- Distributor A submits to appointed body in Member State 1 (Trade Name D)
- Distributor B submits to appointed body in Member State 3 (Trade Name E)







(Art.45) **Formulator** submits to appointed bodies in:

- Member State 1: Trade Name A and Trade Name B
- Member State 2: Trade Name C

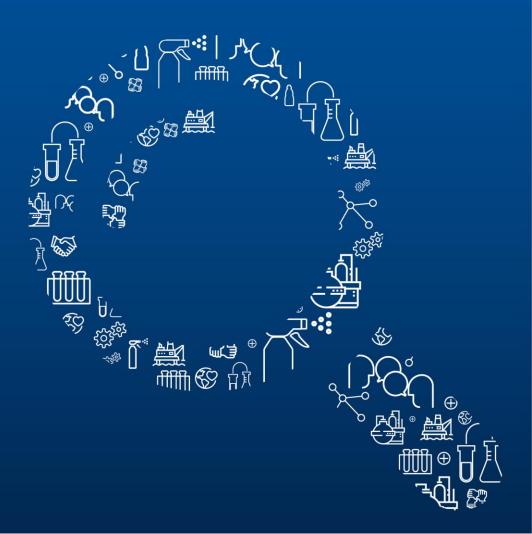
#### (Alternatively)

- Distributor A informs formulator about Trade Name D;
- **Distributor B** informs formulator about Trade Name E in MS 3

#### and

- Includes Trade Name D in submission to appointed body in Member State 1
- submits to appointed body in Member State 3 (Trade Name E)

# Timing - When?

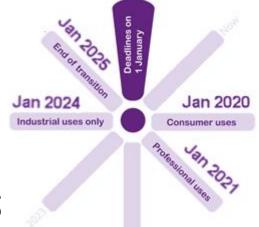






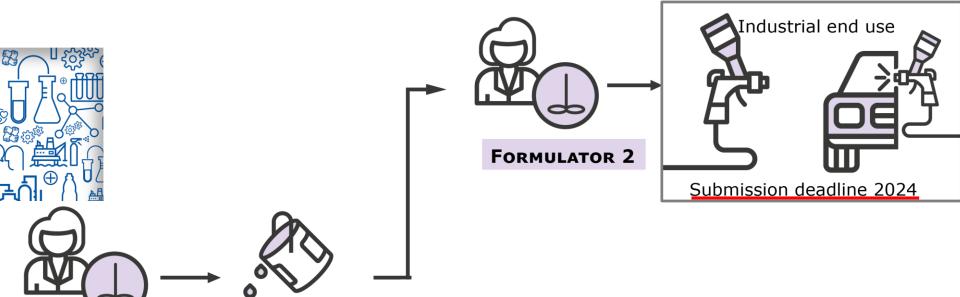
#### **Timelines for compliance**

- Notifications must comply with the harmonised requirements according to the use type of the mixture
  - 1 January 2020: consumer uses
  - 1 January 2021: professional uses
  - 1 January 2024: industrial use only
- Transition period for existing products ends 1 January 2025
  - unless change made to existing notification between relevant deadline and end of transition period



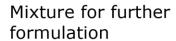


#### Understanding the deadlines 1/3



#### FORMULATOR 1

#### **ORIGINAL MIXTURE**

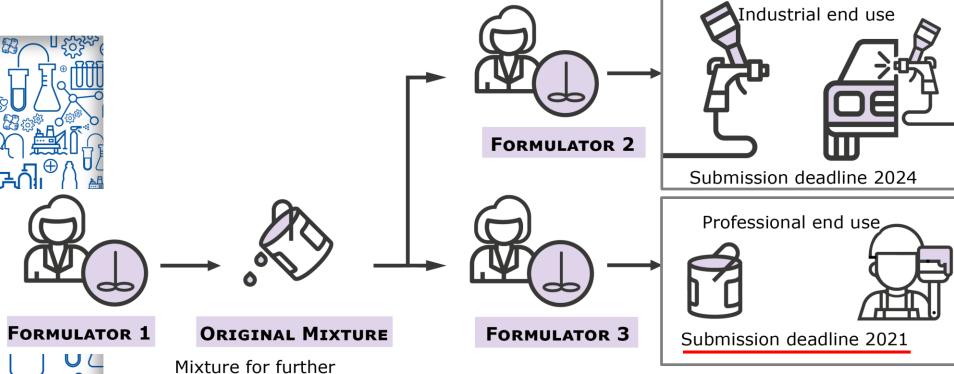


Submission deadline 2024





#### **Understanding the deadlines 2/3**



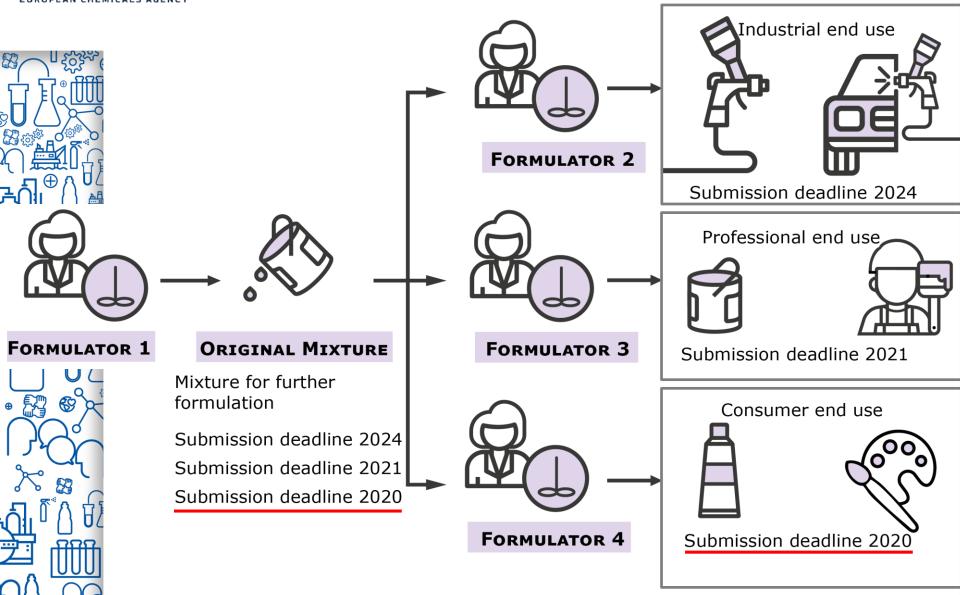
formulation

Submission deadline 2024

Submission deadline 2021



#### Understanding the deadlines 3/3



# Information requirements – What?







# Harmonised requirements in brief



- Submission format Poison Centre Notification (PCN) format, IUCLID compatible, structured fields for information
- Submitter details name, address... consistent with the label
- **Mixture information** C&L, toxicological information, mixture composition, pH, physical state
- Product information trade name, packaging, uses, colour
- Unique formula identifier e.g. YV9K-3J9A-G209-C2T7





### Mixture vs. product

#### **Mixture**

Mixture or solution containing chemical components having associated properties:

- Composition
- Toxicological properties
- Colour
- pH



#### **Product**

Mixture in the form in which it is supplied to the user and defining the other aspects:

- Trade name
- Packaging
- Labelling
- Product category









#### **Mixture information**

- hazard classification & label elements
- toxicological information
- pH
- physical state
- colour
- full composition

Substances

Mixture in mixture (MiM)





#### **Product information**



- Packaging types
- Packaging sizes
- Use type
  - consumer
  - professional
  - industrial
- Product categorisation





# **UFI – unique formula identifier**

- Unique 16 character code
- Makes a link between a specific product on the market to the information submitted on the mixture
- Has to be included both:
  - ➤ on the label\*
  - > in the notification
- One UFI can be assigned to only one mixture composition



\* unless not packaged or for industrial use only - SDS

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#### **UFI** – unique formula identifier



- High flexibility in its use and applicability:
   Mixture/Product/Market/Language centric approach
- It works to protect CBI (e.g. MiM)

UFI known to the relevant AB as part of a submission!

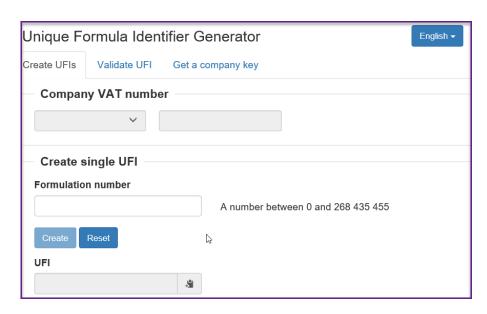
- Same UFI can be used along the supply chain as long as composition remains the same
- Not possible to retrieve information on the composition of the mixture
- New UFI (and new label) needed when:
  - adding, substituting or deleting a component
  - variation in concentration beyond the range specified
  - supplier changes UFI and it has impact on MiM





## **UFI** generation

- Can be generated at any time by any company
- VAT number of your company
- Formulation number
- UFI Generator tool <a href="https://ufi.echa.europa.eu/#/create">https://ufi.echa.europa.eu/#/create</a>



# Action points – Key messages







#### **Get ready now**

- Understand your obligations
  - Role in the supply chain (e.g. formulator? rebrander?)
  - Product placed on the market (e.g. mixture exempted?)
  - End-use of the mixture (i.e. date of application)
  - Portfolio (e.g. market areas and possible application of transitional period)
- Invest in communication
  - with customers: use of the mixture, trade names, countries
  - With suppliers: composition, toxicological/hazard information





#### **Know the information requirements**

- Possibly more detailed than before
- Provision (e.g. attachment) of SDS does not replace the need to provide Annex VIII info
- Composition ≈ 100%
  - Non-hazardous components
  - Low concentration components
  - Exact concentrations or ranges defined in Annex VIII
- Toxicological information (from Section 11 of SDS) to be potentially reviewed: check quality and avoid cross-references



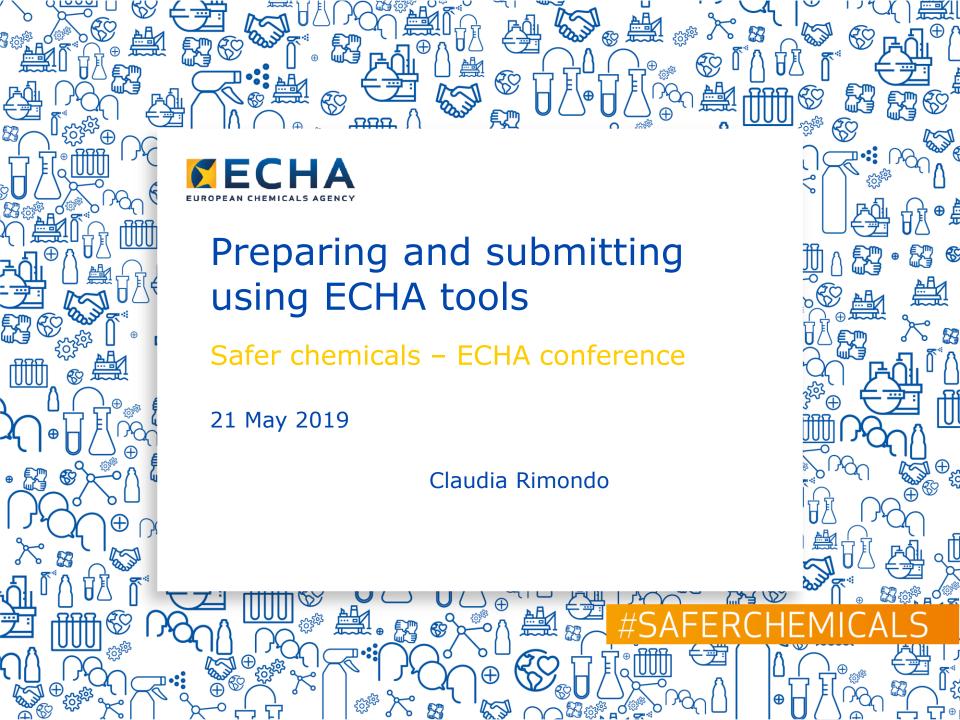


### Plan the relabelling of your products

- Generate and assign UFIs
- No rules on placement redesign of label to incorporate this new element
- Printing of UFIs on the label should be planned to coincide with the submission of information











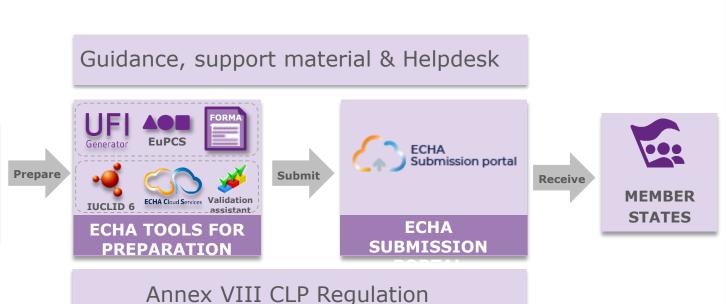
#### **Table of content**

- ECHA tools Dossier preparation
- ECHA tools Dossier submission
- Information material



**INDUSTRY** 

#### **ECHA** tools for preparation & submission

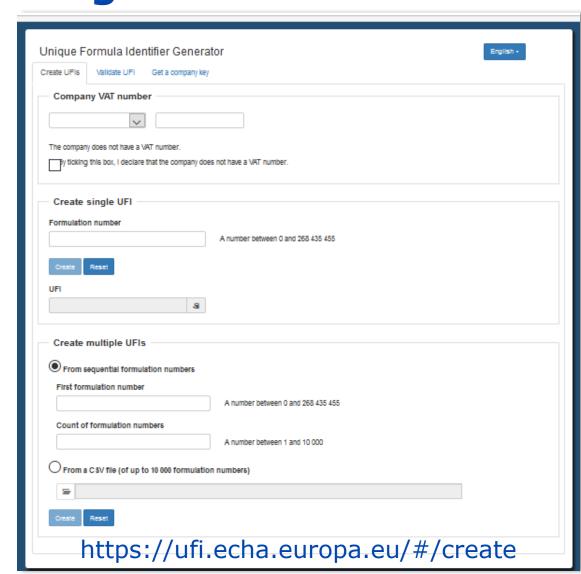


# ECHA tools – Dossier preparation





#### **UFI** generator



- UFI
   Developers
   Manual
- Available in official languages
- Webinar on the UFI





## **EU Product Categorisation System**

- To describe 'the intended use of a mixture' for which a submission has to be made (industry)
- To facilitate reporting and monitoring of poisoning incidents at EU level (Appointed Bodies/Poison Centres)
- Maintained by ECHA and subject to change
- Available in the EU official languages in the future





#### **PCN Format**

- Annex VIII: harmonised format (.xml IUCLID) to provide information
- PCN format version 1 published in April 2018
- Update PCN format (version 1.1) and related documentation published in April 2019
- Example dossier (with corresponding preview)
- Poison Centres Notification format <u>https://poisoncentres.echa.europa.eu/poison-centres-notification-format</u>





#### How to prepare a PCN dossier

#### Online in the ECHA Submission portal:

- IUCLID Cloud
- Guided dossier preparation tool
- Information stored in the ECHA Cloud

#### Offline in IUCLID 6:

- Specific PCN interface
- Local installations of IUCLID
- Desktop and server versions on the IUCLID 6 website

#### Using the PCN format in company's own system:

IUCLID compatible PCN format



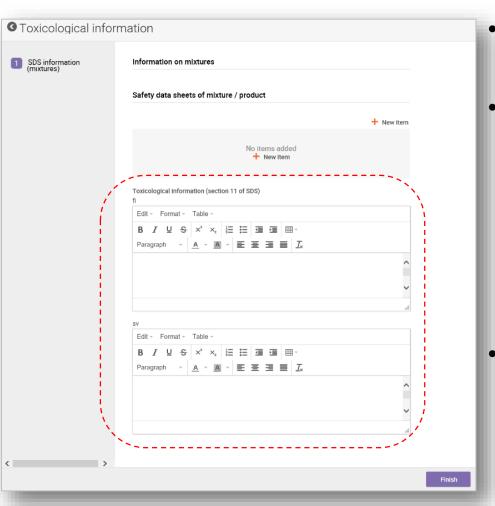


#### Information in multiple languages

- Annex VIII: submission in the official language(s) of the Member State(s) where the mixture is placed on the market [...]
- IUCLID Cloud: User Interface in EN but free text fields requiring input in multiple languages
- Selection from the header section of your submission
- Country/language: table available on the PCN website



# Information in multiple languages



- Toxicological information (mandatory)
- Classification information (where relevant)
  - → Specific effect;
    Specific target organ toxicity single;
    specific target organ toxicity repeated
- Labelling information (where relevant)
   certain Hazard and
  - Precautionary statements





#### Validation assistant

- Before submission (only IUCLID Cloud and standalone)
- Upon submission (S2S transfer, additional checks)
- Types of checks for dossier content:
  - Presence of information (No empty fields)
  - Consistency of information
  - Accuracy/quality of information





### Validation report

Pass (



- Successful submission
- Available to Member States
- Pass with warnings



- As valid as 'pass'
- Report with potential deficiencies
- Report to Member State for their consideration
- Fail



Report with deficiencies

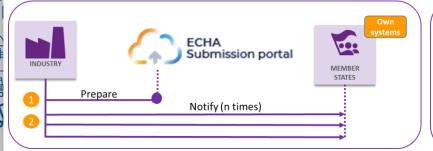
# ECHA tools – Dossier submission





Dossier submission options: MS or ECHA?

Local systems of MS Central system of ECHA





Dossier preparation always using ECHA tools and harmonised format (no Member States specific requirements)

- n dossiers submitted for n
   Member States submitted n times
- submission modalities determined by Member State
- one dossier for n Member States submitted once to ECHA
- ECHA makes data available to Member States





# PCN dossier submission using ECHA tools

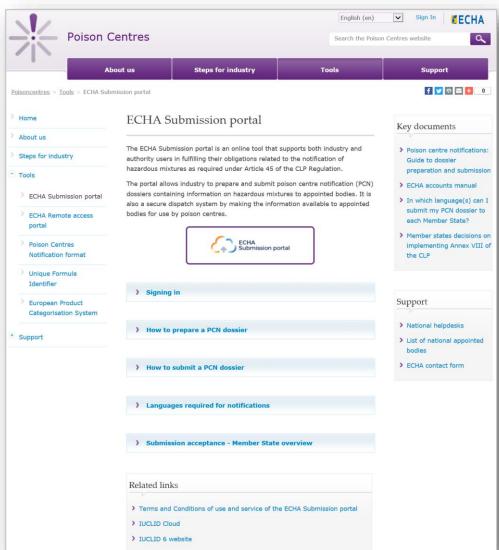
- Online through the ECHA Submission portal:
  - dossier made available to all Member States indicated in the notification
- Through a system-to-system (S2S) transfer from the company's own system to the ECHA Submission portal:
  - Dossiers forwarded from the portal to all the relevant Member States
  - Functionality available in the second half of 2019





# **ECHA Submission portal**





Available from the ECHA Poison Centre website:

https://poisoncentres. echa.europa.eu/echasubmission-portal





#### Version 1.0 features - Industry

- Guided dossier preparation tool / IUCLID Cloud
  - Validation assistant
  - Support to enter multilingual text
  - PDF preview
  - On-line help
- Dossier upload and submission
- Submission report
- Validation report
- Advanced search functionality



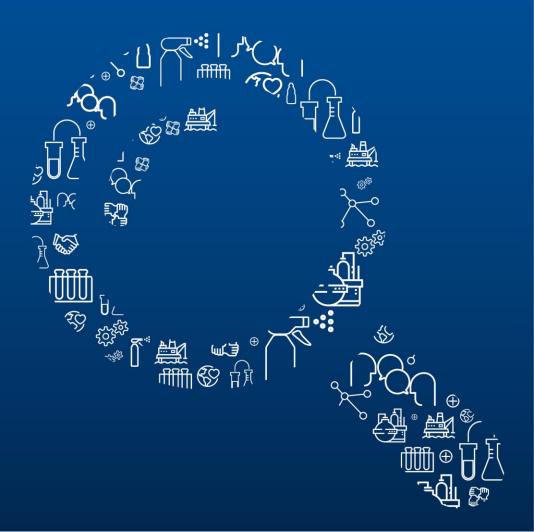


# **Version 1.0 features – ( ) Member States**



- ECHA Remote access portal:
  - Dispatching of the PCN dossier via a country specific secure folder (SSL VPN)
- Downloading dossier
- Validation report
- Login manual to ECHA's IT tools for authority users

#### **Information material**







# Material to prepare and submit PCN notifications

- Guide to dossier preparation and submission
- Steps for industry to fulfil their new obligations
- In which language can I submit my PCN dossier to each Member State?
- Member states decisions on implementing Annex VIII of the CLP (translated)
- ECHA accounts manual







Promotional animation "Notifying hazardous mixtures to poison centres"



- Q&A section
- Publications
- <u>IUCLID Website</u>
- ECHA Cloud services







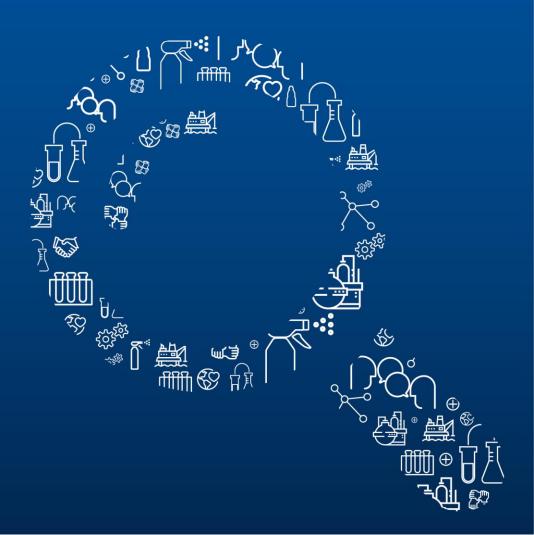




#### Table of contents

- Regulatory matters
- ECHA submission portal development
- Interactions between industry, ECHA and Member States during dossier submission
- Helpdesk

### **Regulatory matters**

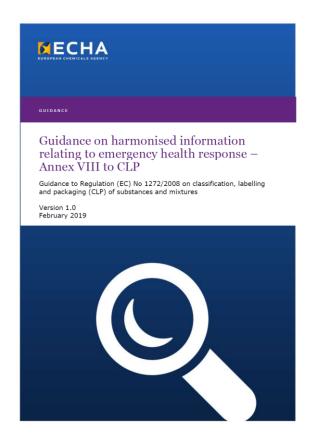






#### Regulatory guidance

- Version 1.0 published in February 2019
- Version 1.1 expected in summer 2019
  - Clarifications regarding the role of distributors
- Translations shortly after v1.1 publication







#### Amendment of Annex VIII to CLP

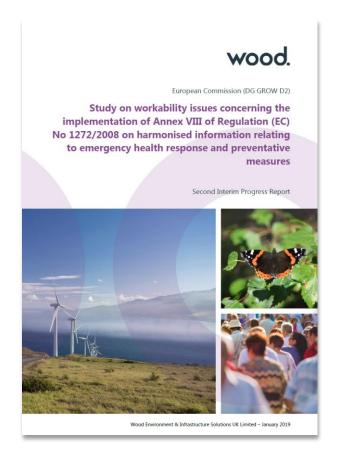
- Editorial changes (terminology)
- Non-editorial changes
  - Simplified rules for group submission
  - Reporting of MiM components
- No solutions for workability issues
- Amendment may be adopted in autumn 2019
- <u>Proposal</u> to add postponement of the first applicability date
  - Consumer use products to be notified from 2021 onwards
- ECHA advises to continue preparations according to existing deadlines





## Workability issues\*

- Draft final report in consultations with stakeholders until 3/06
- Final report expected in summer 2019
- The European Commission <u>may</u> propose further amendments to Annex VIII



<sup>\*</sup>sectors affected: petroleum, construction, gases, paints, perfumes, soaps & detergents;

<sup>\*</sup>issues: mixtures in mixtures and use type, high variability of the composition, multiple suppliers of 'same' ingredient (functional sameness vs chemical sameness), limited usability of generic product identifiers and group submission;

ECHA Submission portal development







# **Portal features for industry**

	Now	July '19	November '19
Submission portal	Live!	Enhanced user interface	
Online dossier preparation tool / IUCLID Cloud	Prepare, create, save and preview	Navigation improvements	Group submission
Dossier validation assistant	Initial set of rules	Enhanced set of rules	
Submission process	Save, upload and submit	<ul><li>Submit online</li><li>System-to-system approach for automated submission</li></ul>	



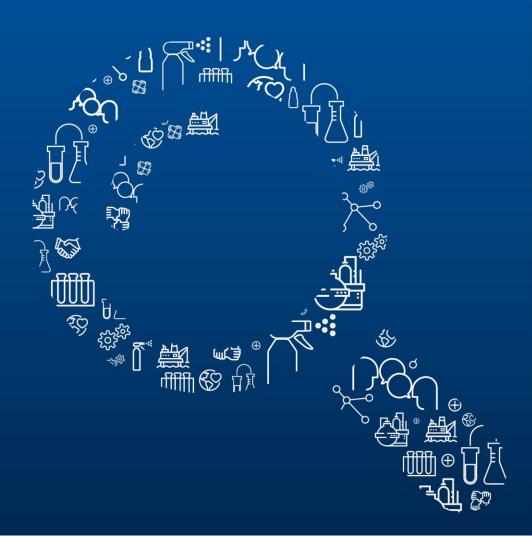


#### **Portal features for Member States**

	Now	July '19	November '19
Data availability to Member States	Member States may download dossiers via secure folder (SSL VPN)	Automatic dossier transfer to Member States (eDelivery service)	ECHA database:  Basic query functionality to access notifications

## **Dossier submission process**

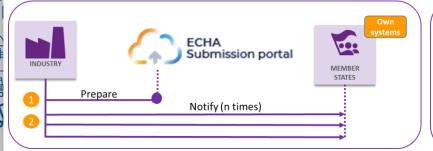
Interactions between industry, ECHA and Member States





Dossier submission options: MS or ECHA?

Local systems of MS Central system of ECHA





Dossier preparation always using ECHA tools and harmonised format (no Member States specific requirements)

- n dossiers submitted for n
   Member States submitted n times
- submission modalities determined by Member State
- one dossier for n Member States submitted once to ECHA
- ECHA makes data available to Member States:
  - dispatches to Member State
  - or
  - provides database at ECHA





# Member States decisions on submission portal



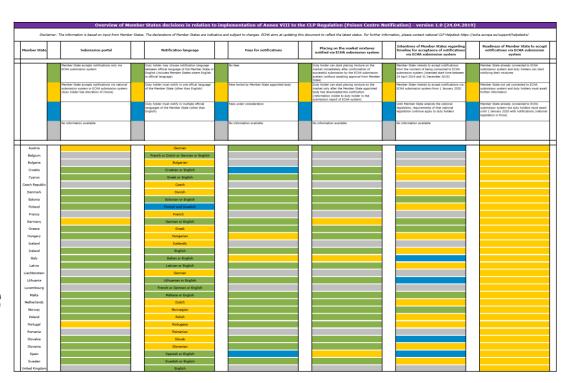
- 19 Member States will accept notifications only via ECHA submission portal (HR, CY, DK, EE, FI, EL, HU, IE, IT, LV, LT, MT, NL, NO, PL, SK, SL, ES, SE)
- 3 Member States will accept notifications via ECHA submission portal or their national submission system (AT, DE, PT)
- Awaiting decision of Member State (BE, BG, CZ, FR, IS, LI, LUX, RO, UK)





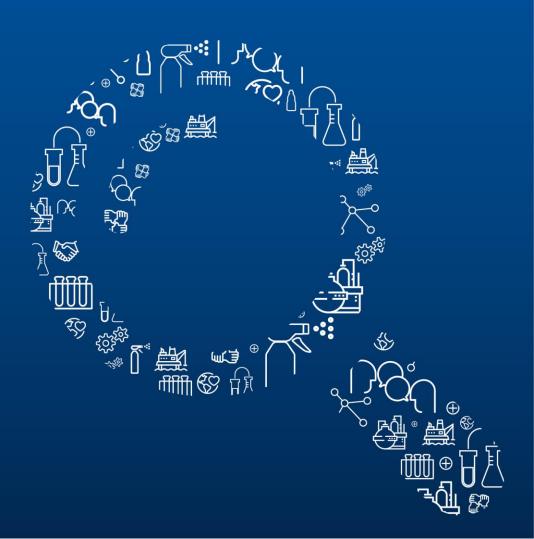
#### Other decisions of Member States

- Language(s)
- Fees
- Acceptance of dossiers
- When will the portal be used?



https://poisoncentres.echa.europa.eu/documents/22284544/27487986/msd\_en.pdf/982d9115-58cb-75c8-80ae-8eb16f5c0009

# Helpdesk







#### **National Helpdesks**

National Helpdesks within the European Union (EU) and the European Economic Area (EEA) Austria Belgium Bulgaria **Croatia** Cyprus **Czech Republic Denmark** Estonia Finland France Germany Greece **I**Iceland Ireland **Hungary Liechtenstein** Italy **Latvia** Lithuania Luxembourg Malta Netherlands **Norway** Poland Portugal Romania Slovakia Slovenia Spain **Sweden United Kingdom** 

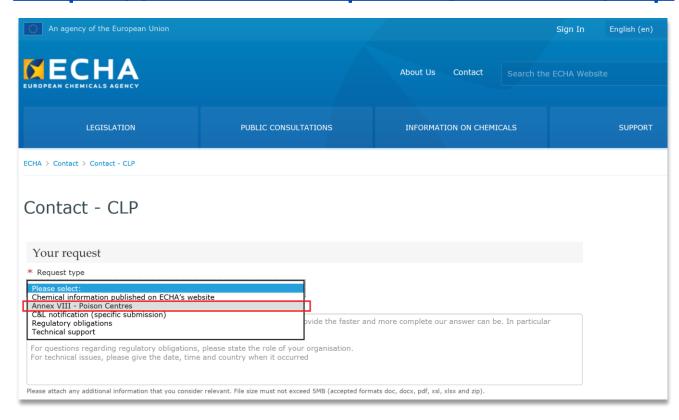
https://echa.europa.eu/support/helpdesks





#### **How to contact ECHA?**

https://echa.europa.eu/contact/clp





#### ~10 minutes



**#SAFERCHEMICALS** 



#### We will be back in 20 minutes











#### Introduction

- The overall aim of today's training exercise is to get familiar with the ECHA tools to prepare and submit a dossier for a poison centre notification.
- Additionally, we want to improve our service and IT systems so we kindly ask for your feedback! Go to <a href="https://app2.sli.do">https://app2.sli.do</a> (access code is **poisoncentre**). Poll closes 31<sup>st</sup> May 12.00 Helsinki time.





#### **Accessing ECHA's IT tools**

- To create an ECHA account you will need:
  - First/last name
  - Email
  - User name
  - Establish password



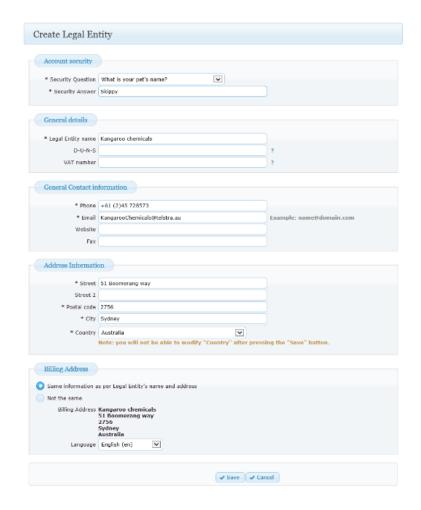
https://idp-industry.echa.europa.eu/idp/





#### **Legal entity**

- Upon verification of the email you encode your legal entity
- A legal entity can also be created for non EU/EEA countries, BUT there will not be access rights to submit to the portal

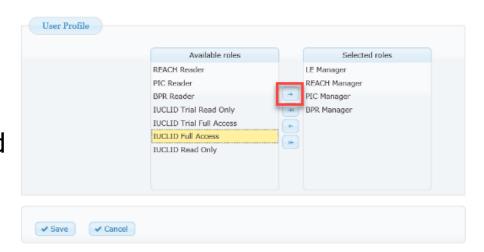






# **Explaining user roles**

- User roles control what the user can read or access.
- Go to the 'User' tab and check the user roles assigned to a user



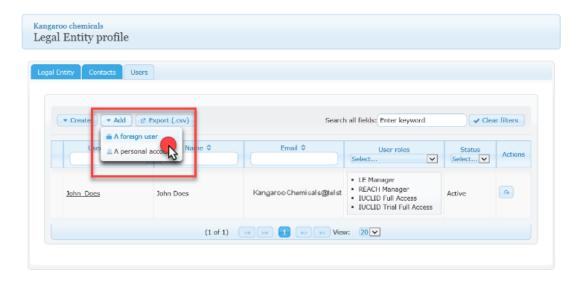
- Edit roles if needed:
  - > REACH Manager allows access to ECHA portal
  - > IUCLID Full Access allows access to IUCLID cloud





#### Adding a foreign user

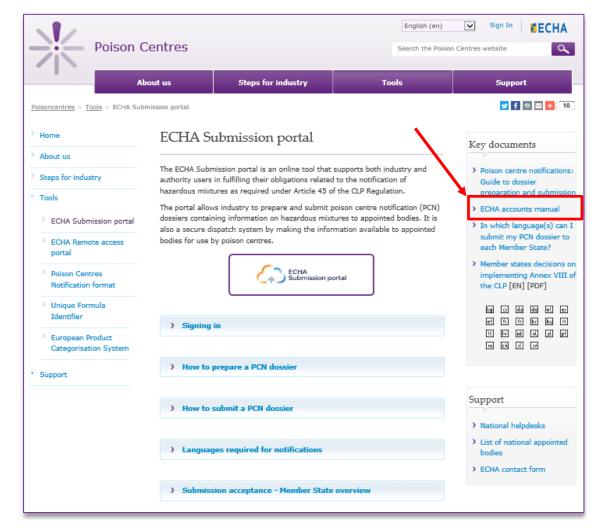
- A foreign user allows a third party e.g. a consultant to work on your behalf
- You can add a foreign user from the 'Users' tab by entering their legal entity information





#### **Portal entry point**





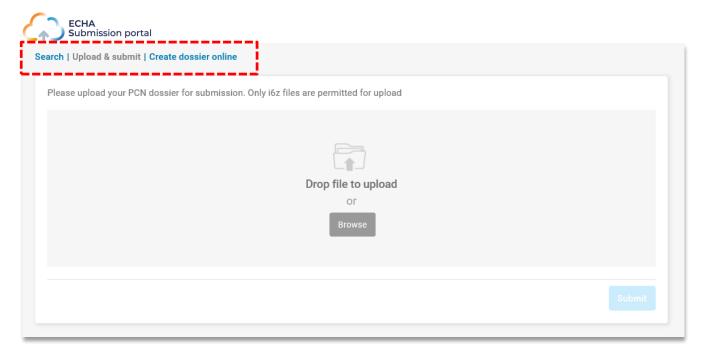
https://poisoncentres.echa.europa.eu/echa-submission-portal





# From the portal navigation bar...

- Search submission page
- Upload and submit
- IUCLID Cloud for online creation of a dossier

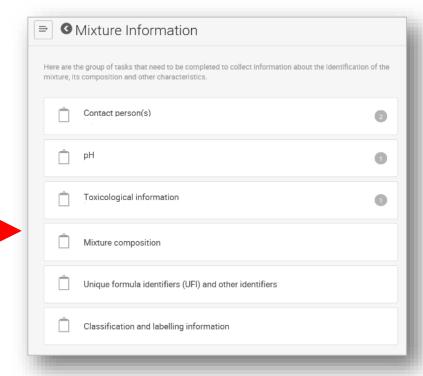






# **Structure of guided preparation / IUCLID Cloud**

- Information is required in two main task groups the mixture and the product.
- Each task group has a series of tasks.
- Records are created for each task in which information can be entered.







#### To assist you...

- Desktop set up with shortcuts:
  - to ECHA's poison centre website
  - UFI generator
  - IUCLID 6
  - ECHA Submission portal (testing environment)
- Google drive with files containing the information needed to prepare the dossier plus today's presentations -<u>bit.ly/echaconference</u>
- Raise your hand and ask one of our experts!



Poison Centre Notifications: hands on training exercise -Prepare and submit online

ECHA Conference 'Safer chemicals'

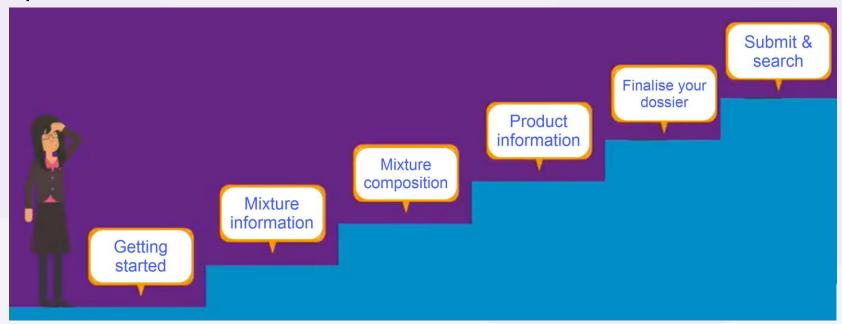
21 May 2019

Heidi Rasikari



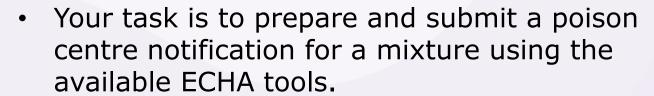
# Modules for today's training

- Today's training exercise consists of a number of modules.
- Each will be first introduced to you then you will have some time to work independently.
- A demonstration of how to complete the task will be provided.





# Setting the scene





- The mixture is a new formulation of dish washing liquid and comes in different package types, trade names and UFIs, and is placed on the market in Finland and in Sweden.
- You have been provided with an example data sheet with all the data you need.



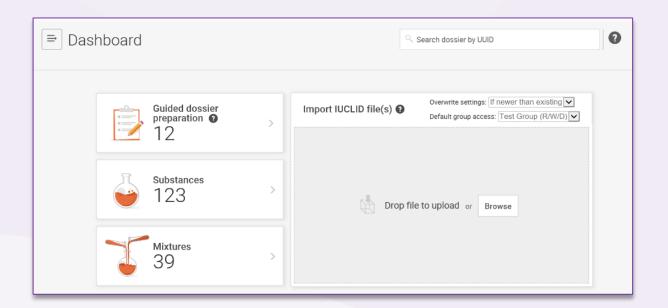
#### Module 1. Getting started

Aim: to gather the information you need to initiate a guided dossier preparation, how it defines the scope of the submission in the dossier header.



# Let's begin!

- Login to the dossier preparation tool
- Landing page is the dashboard
- To start, select guided dossier preparation, then select new PCN submission
- Got everything ready? Google drive <u>bit.ly/echaconference</u>





#### Before you begin the dossier header

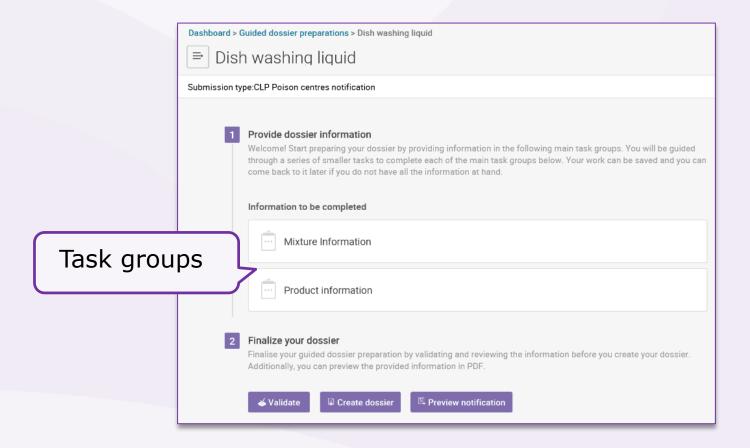
- You need to build the framework for the dossier by completing the dossier header.
- Dossier header is like the 'cover note' to the dossier and information must be provided to:
  - define the scope of the submission (e.g. single or multi-market)
  - create the necessary fields in the dossier (e.g. multilingual fields)
  - allow the system to determine which rules need to be checked (e.g. updates vs initial submissions vs limited submissions).

You are ready to GO!
Refer to your 'example data' and have fun!





# **Outcome: Mixture navigation page**





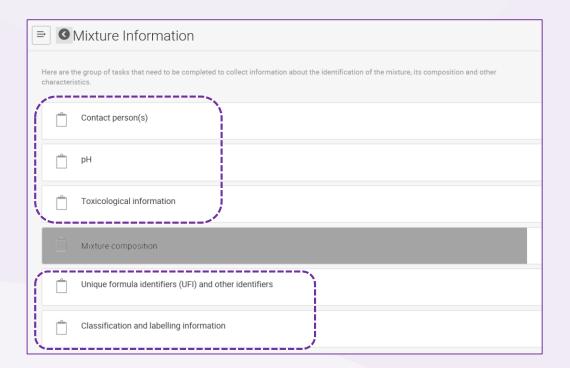
#### **Module 2. Mixture information**

Aim: To create records for each task and enter the required information for the mixture.



# **Providing mixture information**

- Six tasks have been created for the mixture information no records exist yet.
- Composition task will be covered in the next module.

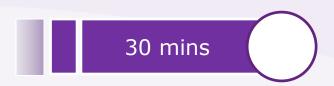




#### Before you begin mixture information

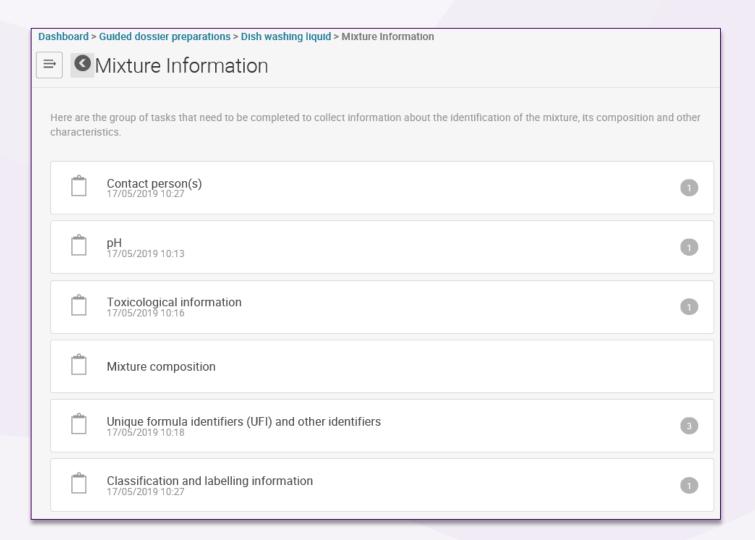
- Remember for multimarket submissions, free text fields (in C&L and toxicological information) must be provided in all relevant languages.
- Consider the approach you take when entering UFIs in the UFI task, either:
  - One UFI code per UFI record (single assignment)
  - Multiple UFIs in a single record (grouped)
  - · Or a combination of above.

Extra: Upload the SDS for the dishwashing liquid (non mandatory information) available in Google drive.





#### **Outcome: Records created**





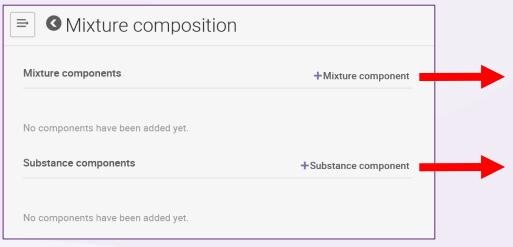
#### Module 3. Mixture composition information

Aim: Get familiar with the various subtasks for adding mixture components (i.e. mixture in mixtures and substances).



# **Adding components**

- Mixture composition tasks generates subtasks for:
  - mixture components (MiMs)
  - Substance components



	Function and concentration 26/04/2019 14:50
Ů	Unique formula identifiers (UFI)
Ů	Mixture-in-mixture composition
Ů	Classification and labelling information of the mixture-in-mixture
Ů	Supplier
Ů	Mixture safety data sheets
Ů	Function and concentration 26/04/2019 14:51
	Substance identification 26/04/2019 14:51
Ů	Classification and labelling information of the substance



#### Before you begin mixture composition

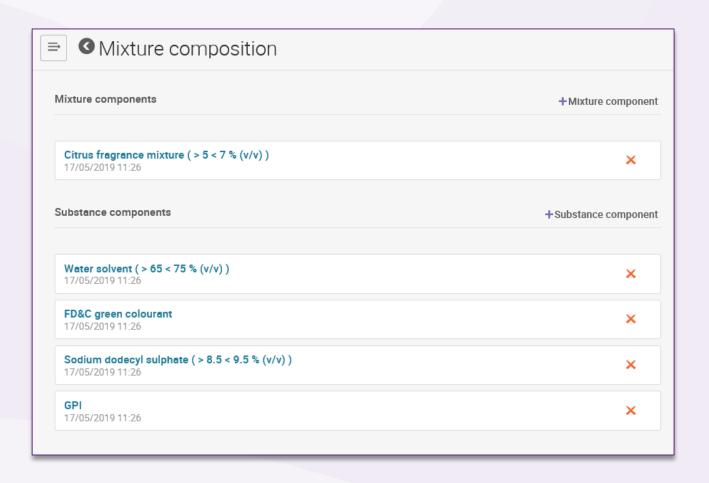
- All components must be declared
- Function (except for GPI) and labelling information not mandatory
- All substance records created need to be linked to a reference substance.

Extra: Add an additional substance component (4.5% v/v)- non classified fragrance identified using the generic product identifier (GPI).

50 mins



# **Outcome: components listed**





#### **Module 4. Product information**

Aim: to define your products in product records and link all UFIs created earlier.



#### **Product information**

- All the product information is contained in a product record or records.
- Records can be defined flexibly— no right or wrong way
- Each product record contains:

Product identifiers

Trade name(s); UFI(s)

Market placement

Market area(s)

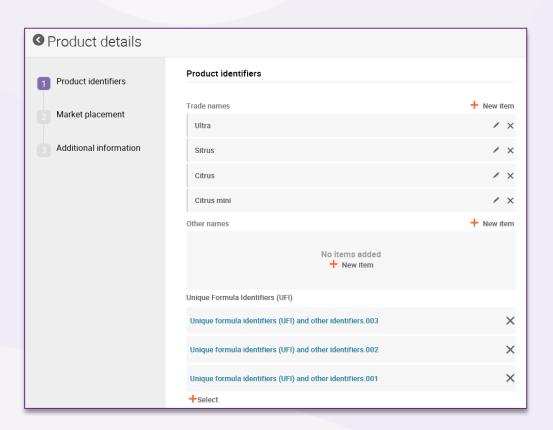
Colour(s) and physical state Pack types/sizes
Use types; Product category

102



# Defining product records (1/2)

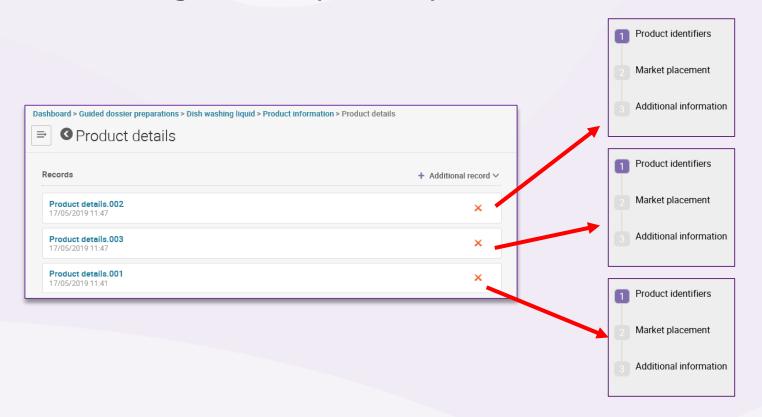
One record contain information on all products





# Defining product records (2/2)

 Or, multiple records can be created - each containing more specific product information.





# Before you begin

- Consider the approach you wish to take to define the product records.
- If you choose multiple record approach, you can reuse some of the existing information.

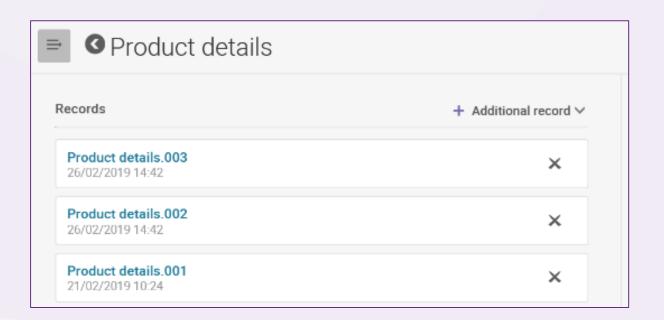
Extra: Try adding a new (4<sup>th</sup>) UFI for one of your products then go back to the UFI task and see if it is listed there.

30 mins



# Outcome: Product record(s) defined

Your product records will be visibly listed, e.g.



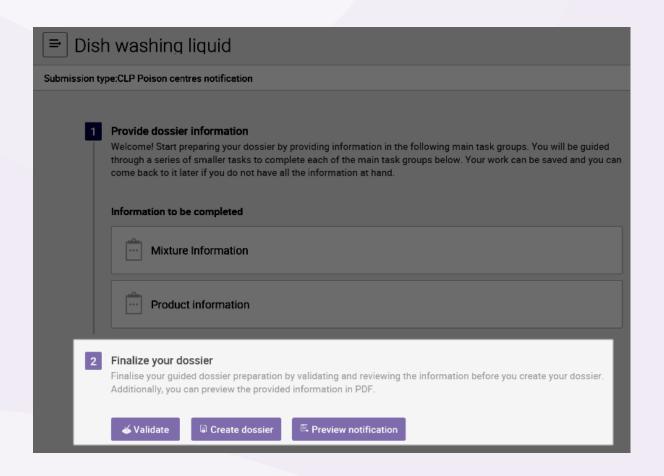


#### Module 5. Finalise your dossier

Aim: No pre-submission validation rules triggered, and a dossier is successfully created and saved to your desktop.



# Finalise your dossier

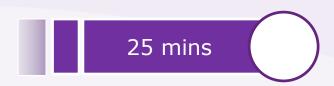




# Before you begin

- If your information has triggered some validation rules, make any necessary changes, then revalidate.
- Once you create your dossier, open it, then export it to your desktop (see the overflow menu icon `...')
- Save the .i6z file with a more meaningful name.
- Generate the preview report only after you create your dossier.

For users that passed the validation rules – CONGRATULATIONS! If you want see how the validation assistant works for failing dossiers, go back to one of the tasks and remove some information e.g. pH, and revalidate.





#### **Outcome: Preview notification**

 You can compare the outcome of the notification preview report with one we prepared earlier!





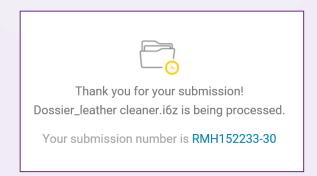
#### Module 6. Submit and search in the portal

Aim: make a successful submission to the portal and check the submission status in the submission report.



# Before you begin

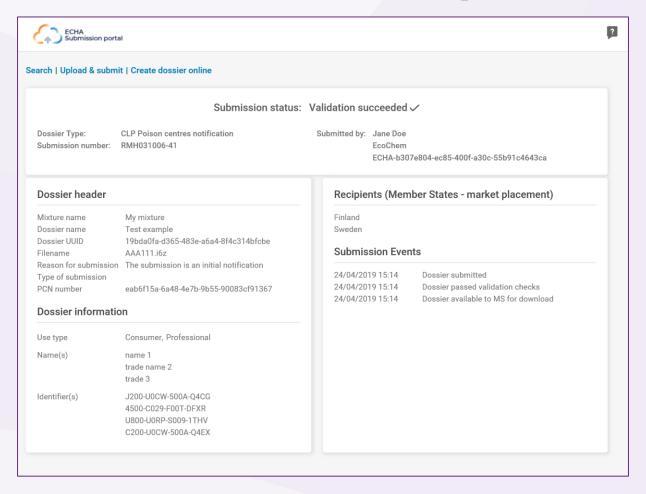
- Go to the ECHA Submission Portal tab (testing environment)
- To submit, you need to upload the dossier first
- Take note of your submission number and search for the submission report.







# **Outcome: Submission report**





# **Congratulations!**

- That concludes today's training on preparing and submitting a PCN dossier online!
- Don't forget to give your feedback! Go to <u>https://app2.sli.do</u> (access code is **poisoncentre**).
   Poll closes 31<sup>st</sup> May 17.00 Helsinki time.

# Thank you! heidi.rasikari(at)echa.europa.eu



# Want to go a step further?

Extra: Try creating and submitting a notification update by adding a new packaging type.