Webinar:
Questions and answers

ECHA organised a webinar on 31 March 2021 on PCN: Best practice from start to market.

This document compiles the questions and answers from the webinar. Minor editorial changes have been made to correct spelling mistakes and some answers were revised and improved for clarity. The document will not be updated.

This transcript reflects the answers that were provided during the webinar – note that for the most up-to-date advice on Article 45 and Annex VIII to the CLP Regulation, refer to the Poison Centres website for relevant support material, or if in doubt about any of the answers covered in the webinar, contact us.

Question	Answer
One of component of mixture was changed (without effect on classification and product information).I will need do update-new notification. I will add new PCN number, new composition, new UFI with related PCN number . Should I also create a new classification and product information sections ?	If the change falls within the remits of Section B.4.1 you only need to update the submission, but not create a new one. Please refer to Section 74. Keeping information up to date from the Guidance on Annex VIII. No, you don't need to create a new record if the information doesn't change. You can reuse the existing information.
I am going to make 'New notification after a significant change of composition' (due to component change) according of Section B.4.1. Based on the previous documentation -Do I also have to	You have to update those sections as far as they are affected by the change in the component, rather than add new ones. Information which doesn't change can be resubmitted as it is.

add a new section for classification, packaging, ph, etc. (these sections remain unchanged) ?	
Bulgaria is in the initial stage of accepting notifications, sent through the ECHA portal. How we can register our product ? Is possible our distributer from Italy to register with our UFI code for all countries in Europe, as Italy is at the higher level of accepting notifications ?	Each duty holder has to notify to the Member States where they are placing on the market. Using the ECHA submission portal, it does not matter from where you submit your notification, just to which Member States you want to send them. It is possible to make submissions to Member States not yet connected to the portal. They will remain in the database until the Member States has connected and therefore not be required to be re-submitted. However, until the Member State has accepted these submissions, they are not considered as meeting legal obligations. For further clarification, you can contact the relevant appointed body. You can find their contact details at: https://poisoncentres.echa.europa.eu/appointed-bodies
About new v4 oct2021 PCN format: can we expect a draft of the new format published on Poison centre website in advance, if yes when? for example in august as happened last year? This draft is useful for IT providers. thank you	The plan is to share the draft versions as soon as they become available, usually starting from July. The draft versions will be uploaded on the PCN website.
After notifying products, do we need to receive any confirmation from countries before placing products in their markets? Or only the portal information of receiving the dossier is enough? many thanks	Accepting notifications implies that the Appointed Body is connected to ECHA systems and has the means to retrieve/view the notification. The Appointed Bodies may require certain additional criteria before they consider it possible to place on the market. The submission report indicates in the 'Submission events' when the Dossier has been received by [country code] but to know if the Appointed Body considers the dossier as "accepted , you will need to ascertain that both the following conditions are fulfilled: A. The Member State is connected to ECHA systems. You can check from the Overview of Member states decisions https://poisoncentres.echa.europa.eu/documents/22284544/27487986/msd_en.pdf/ B. Whether the dossier has passed the validation checks/dossier has been received. You can see the submission report.
Are all MSs now using PCN or do they still use their equal national systems ?	ECHA collects and publishes relevant available information via the Summary table https://poisoncentres.echa.europa.eu/documents/22284544/27487986/msd_en.pdf/982d9115-58cb-75c8-80ae-8eb16f5c0009 To see it, on PCN home, click on National Appointed bodies (quick links on the right), then the overview on the "key doccuments" part
Are we obliged to notify in PCN aerosol product, where aerosol can is filled with only substance either a flammable gas (classification Aerosol 1) or a non-flammable gas (aerosol 3)? Gas substance in aerosol can is registered or exempted from obligation to register.	Substances alone are not requested to be notified to poison centres. You can check Section 3.3 What is the scope of Article 45? from the Guidance on Annex VIII for further explanations.

As regards notification update for composition change, do we have to add any futher information on a free text box?	It is not required as the submission type name already clarify that the composition has changed. A justification is required in case of normal update
Being based in the UK we made submissions via the portal and through countries own PC before 31/12/20 and have 2 questions please, 1) is there anyway we can access the ECHA submissions to follow their progress 2) is it possible to update these submissions with more languages although we are in UK.	Following Brexit, UK companies can no longer access the Submisison portal as duty holder. This means they cannot submit and cannot access submissions already made and follow them up. We remind you that the EU importer is now responsible and potential duty holder.
Thanks for the reply, can we working with the EU company resubmit the PCN again so we cover the EU Importer's obligations	You as non-EU supplier can possibly help the EU importer by preparing the notification as "foreign user" from their account (more information the ECHA accounts manual available on our website) . Alternatively the EU importer has to notify on the basis of the information you provide
Bespoke paints at the point of sale: To a notified paint base in a can (labelled with UFI), are added tinting pastes. According to the exemption, is it sufficient to only affix the UFIs of the tinting pastes on the lid, whereas the UFI of the paint base is printed separately on the side of the can?	Note that the UFIs should be placed on the label, or close to the other label elements. It is accepted to use a sticker. The option of placing the tinters' UFI on the lid is not recommended unless it is the only option available. See the Guidance on labelling and packaging on the EHA website
Can I leave the countries from an intitial submission in the IUCLID dossier when creating an update that is submitted to further countries?	You should leave those countries in. A validation rule actually checks that no country has been removed. Therefore, you can add countries but you cannot remove them.
Can I submit a notification of a product even If a MiM doesn't send its UFI after many requests or the same supplier gives me a UFI code which is not notified in the countries where I have to sell my products? I guess I can do but I have to enter all the data of my supplier.	Yes, the legal text describes the way you can submit information for a MiM - see for more details I presented in the slides (and the Guidance, section 5.3).
Can one enter the UFI link and enter the commercial tax number of the firm and fill it out acording to the information they have? Is membership required?	The information required is specified in Annex VIII. Tax number and memberships are included.
Can we consider information in section 3.2. of MIM SDS as "the full composition of the MIM" in case of MIM present in final mixture in range 0.1 to 1% with hazardous classification (physical, human health) but without information on non-hazardous substances in MIM and UFI for MIM not yet available?	When the composition of the MiM is fully known, it components have to be indicated as component of the final mixture (i.e. no MiM). If the MiM is not fully known, than you identify the MiM as required by Annex VIII (see Section 3.2.2, Part B). The Guidance on Annex VIII provides full explanation
What to do if perfume has more than 20 substances and is present in concentration 0.8% in mixture and any of hazardous substanes in perfume cross limit 0.1% in final mixture? Is necessary add in MIM all more than 20 substances if UFI is not available?	If the MiM is not fully known and you don't have a valid UFI for this MiM, you follow the legal text which says that the MiM has to be identified with composition available on the SDS (plus other known components) and supplier's details

Concentration ranges for substances in section 3.2 of MIMs SDS are wider than allowed in tables 1 or 2 in Annex VIII CLP. Supplier is not willing to narrow range in SDS. How to narrow properly too wide range (for example 1 to 5% for substance classified H318) to notify without validation mistake?	The information required by Annex VIII is not the same as the information required by Annex II to REACH (SDS). Information in Section 3.2 of the SDS is normally not sufficient to fulfil the submission requirements and the needs of the PCs on the final mixture. But in case of a MiM, if you don't have the full information or a valid UFI from the supplier, you can identify it with the information available from the SDS (in addition to the supplier's details). Please, see the Guidance on Annex VIII for more information.
Does ECHA intend to modify PCN so that toxicological data can be included already in substances data (including the choice of languages) and with substances moved into toxicological information section for mixtures and not have to been constantly added in every mixture where the substance is added?	No, there is not such plan. In case you wish to provide input to improve the PCN format, you can submit your feedback via the ECHA Contact form https://comments.echa.europa.eu/comments_cms/Contact_CLP.aspx
Does every member state will in the end accept the ECHA portal for notification or some might want to stick with their own system ? Thank you	We understand that Member States, who are in varying stages of connecting with ECHA, are committed to accepting portal notifications shortly after 1 January 2021, at least for consumer and professional products. For your information, we are updating the Member States Overview table regularly to include the information received. Unfortunately there are a number of Member States for which we have no conclusive information and therefore we do not update the table. In such cases, you need to contact them directly to find out more, as it is within their remit to decide how and when to accept these submissions. You can find their contact details at: https://poisoncentres.echa.europa.eu/appointed-bodies
Due to the new composition, I'm going to do 'new notification after a significant change of composition'. Can I modify or remove the composition sections from the previous notification or need to add a new section ?	Yes, you can modify the composition section if preferred - or you can also remove the section and start again. Alternatively you can use the "clone" option to create a copy of the original dossier, in case you want to maintain both versions.
For pH justification is in PCN offered also "pH is above 15" and "pH is below -3". Normal range for pH is 0 to 14? Is it any mistake in PCN or which types of mixtures could have such extreme pH values?	No mistake. This is what was agreed with the WG who provides input on the validation rules. 0 and 14 are standard values, more extreme value are possible
Going to supply hazardous mixtures to Austria we submitted our PCN via the portal.For stating the Austrian emergency response tel no on SDSs there is a separate process and we need to submit information also for substances and other mixtures.Is that a legal requirement for a non Austrian company?	Substances are outside the scope of Article 45 and Annex VIII. Austria (as well as other Member States) may have additional national obligations in place which should be checked with the relevant authorities
Good morning, it is well understood that the "dossier acceptance" is not covered by the PCN portal. How can we check this status? Thanks.	The acceptance criteria are gathered in the document Overview of Member states decisions on implementing Annex VIII to the CLP, available from the Poison Centres website. The Portal will indicate when a dossier has passed the validation rules(i.e. successfully submitted) and is available for

	a specific Member State. For a specific acceptance notification, you can always contact the national Appointed Body.
Good morning, not clear to me if the status "Dossier accepted" (which in some countries is required for product placing on the market) will appear in the submission report too or if we have to check it in some other ways. Thank you.	No, "Dossier accepted" will not be visible in the portal. The submission report only tells you "Dossier received by [country code]". The "acceptance" is not covered by the portal. To check if you dossier will be accepted, you can check here Here https://poisoncentres.echa.europa.eu/documents/22284544/27487986/msd_en.pdf/982d9115-58cb-75c8-80ae-8eb16f5c0009
Hello, about updated pcn format: can you confirm that current v3 oct 2020 format will be accepted until oct 2022 or even later (so at least 1 year after v4 oct 2021 format will be published)? this is important for companies using external systems to generate i6z dossier. As a feedback from IT provider I can tell you that 1 year may be necessary to IT providers to adapt (it depends on the amount of the changes and when the official technical documentation is published). So I suggest to keep the 1 year transition period.	We are discussing how we can grant a transition period to allow IT providers to adapt to the new format. However, from the information provided by industry so far, it seems 1 year is too long. We will provide additional information on the PCN format changes plans asap. Please, note that in any event submisisons have to be fully in compliance with the legal requirements.
Hello, does H and P phrases must be in languange of county we do notifications ,like section 11 of SDS (toxicology data) or they can be in e.g. english .	Most of the information in the C&L section is to be provided from a pick list and is delivered to the relevant appointed body in a codified way. The language which will be read by the receiver depends on their setting and system, if they import the dossier in their own system. The picklist values are displayed in English if the appointed body accesses the dossier information from the PCN database. Nevertheless, the PCN format includes multi-language free text fields, some of them complementing the H & P statements. These are not automatically transtaled and have to be filled in the relevant languages by the submitter.
Hello, I am working for a toller, some of our distributors want to create and put UFI on the labels, even if the products are not classified. Do we need to create a UFI or just them notifying it with the 100% MiM with the name of the product and the SDS is enough?	I would say that if the mixture is not classified a notification is not required. However, the options are for the toll formulator submits a voluntary submission by including all the information relevant for the distributors, or for the distributor to make a notification and include the information they have for their 100% MiM - i.e. either using your notified UFI, or the information in the SDS plus the supplier details.
how could I solve QLT592? when I have two substances which have the same classification but with different characteristics	If the Substance identifiers and the Classifications are the same we would recommend to merge the information to one substance so that Poison centers can have easily readable format of the composition. If the different characteristics in substances would be relevant for the medical response then that information should be reflected in the 'Toxicological information' field.
How do a submitter receive the acknowledge/confirmation bit (e.g. Germany) MS received the PCN submission w/o failure?	The submission report only displays when a dossier has been received by a MS. No information on the actual "acceptance" is provided by the portal as each MS may have its own acceptance criteria. You can check those criteria in the document Overview of Member states decisions on implementing

	Annex VIII to the CLP, available from the Poison Centres website. You can always contact the national Appointed Body to have a specific submission related acceptance notification.
How do I manage a MiM consisting of up to 15 components, each at a concentration range of 0-100%? This could be the case for a lubricating oil for instance.	There are not rules checking MiM's composition. But we assume the classification remains the same. You should always keep in mind that the purpose of this exercise is to provide clear and useful information for the emergency operator
How do I submit a PCN notification to the Czech Republic?	In principle you can submit to Member States not yet connected. They will remain in the database until the Member States has connected and therefore not be required to be re-submitted. However, until the Member State has accepted these submissions, they are not considered as meeting legal obligations. You can find the contact details of the Appointed Bodies for further clarifications at: https://poisoncentres.echa.europa.eu/appointed-bodies
How does the portal handle toxicological information not provided in all required languages, when the corresponding countries have stated to also accept English as a language for notifications?	With the April release, validation rules checking that information is provided in the languages required by MS will be in place. If a MS accepts in e.g. Finnish or English, the rule will check that at least Finnish or English had been selected in the dossier header and the related free-text fields are filled in.
How is the progress of branding the bags -if the product is cement- for example? If we are able to use the same UFI code for the same formulation for different suppliers, is it possible to make a code for Germany for example and use it for each case?	The question is not fully clear. The UFI is not linked to a specific MS but to a mixture composition. You can generate a UFI and use it to notify the same mixture in several MSs.
How long does it take a State to accept a submitted dossier?	It really depends on the MS. In most of the MSs a submission will be accepted automatically as soon as passes the Portal's validation checks and is displayed as available for the relevant MS(s) in the submission report. You can check the Overview of Member states decisions on implementing Annex VIII to the CLP available on the Poison Centres website https://poisoncentres.echa.europa.eu/echa-submission-portal
How to notify to EU PCN when not an EU LE and the mixture dataset/dossier UUID and that of the notifier both have to match and be from an EU LE?	If you are a non-EU LE you do not have any obligation and are not allowed to submit via the Submission portal. If needed you can notify via an EU-based LE. You can find information on how to do that in the Guidance available here: https://echa.europa.eu/documents/10162/13643/guidance_on_annex_viii_to_clp_en.pdf/412c5874-f8ec-cf52-fe1e-2fbe08fe2d11
How to use the "PCN Preview Report" that has just been mentioned? I mean prior to submission but after validation.	The PCN Preview report is available from IUCLID only. As such you can can generate it from your dataset or dossier but it does not contain submission information. Submission related information is contained only in the submission report, as you'll hear during the presentation.
I help company importing detergent powder for cleaning food contact articles from China. Powder mixture producer does not give much information on exact composition. SDS completely outdated. Asked how to make EU regulation SDS. It may contain unknown impurities. How to deal with this for PCN?	The principle under CLP is that you need to know the composition of the mixture you are placing on the market (importing is placing on the market). If you lack the full details you may contact the non-EU supplier (maybe the formulator that knows in detail the composition) to make a voluntary submission. You can find these options in the Guidance on Annex VIII, Section 3.3.1.4 Submission of information made voluntarily and Section 4.2.5 UFI and non-EU suppliers.

I am a Toll formulator. My customer places on the market the product I formulated,with its own label (only his name the label). If I provide the notification,should I provide information of the company that sells (responsible for placing on the market,with his name) the product? If so,where and how?	Toll formulators are indeed the duty holders under Article 45. The submission will include your details and not those of the distributor (unless they decide to submit themselves). You can find a specific "This week in Helpdesk" document tackling your scenario, called "Toll formulators and PCN". You can find it in our Q&A section at: https://poisoncentres.echa.europa.eu/questions-and-answers
I giving service for two companies inside of my company. I made mistaken initial submission under the wrong entity (forgot to re-log). Then I made the same submission under proper entity. Both submissions are failed because of this. How to handle such mistake to make proper submission finally?	I recommend you contact the ECHA Help desk and provide the submission numbers of those submissions. I understand from your description that you failed the initial notification as well and we need to understand what kind of failure was triggered. Probably some LE related failures? Happy to help provided that you give us some more detail to understand the case.
I have mixture for professional use. Three components have a concentration range between 3 and 10 % but Annex VIII for such profile of hazardous require only 1 % range . The division of concentrations of into smaller ranges causes a huge amount different compositions. What should I do ?	The need for such limits in the concentration ranges comes from the very purpose of Article 45: provide detailed enough information for the emergency response. If a component can vary beyond the limit, a different notification and UFI is needed.
I have a MiM in my mixture without UFI. Have i to attach MSDS in the submission for this MiM? Are the information of the supplier enough? Thanks	The SDS itself does not need to be attached. Please consult the Guidance on Annex VIII on ECHA's website for full information
I have a substance classified for health and environmental (H315 H410). Can I report it in IUCLID as H315 only? What about mixtures classified for health and environmental, can I do the same? What about labeling? Can I omit P-phrases (P273) and Pictograms (GHS09) for environmental hazards?	Information on environmental classification is not mandatory for PCN purposes. Nevertheless., this information can be voluntarily included in the submission for the sake of providing a more complete notification. Also, consider that this mixtures may be used as MiM further down the supply chain, and therefore other formulators will have complete information to comply with their duties.
I have notified a mixture with 3 UFIs, one for each trade name. Later I decide to update this notification using the same UFI for these 3 trade names, but ECHA system doesn't accept this update because in it there's only ONE UFI and not 3. So I can't do this choice. Why?	It is hard to say what is the issue here - I would suggest you contact us via the Helpdesk and we can better support you with this - also make sure to include submission numbers or screen shots if relevant https://comments.echa.europa.eu/comments_cms/Contact_CLP.aspx
I have submitted an updated PCN dossier (correction of trade name).In the validation process I had conducted there was no fail,no warning. It is successfully received by the CA but as "succeeded with warnings".It is not possible for me to find out what kind of warnings these are.Can you help me ?	Warnings are listed in the Validation report: can you see that from the submission report? To better help you, I kindly invite you to submit your question via the ECHA Help Desk and provide your submission number so we can investigate what the problem could be.
I have to make a voluntary submission for a substance. Is a UFI code required in the submission?	The UFI is a legal requirement only for mixtures falling under the scope of Article 45 of CLP Regulation, therefore substances are outside. The ECHA Submission portal is primarily for the submission of information for mixtures to Appointed Bodies and their Poison Centres.

Can I put the posion centre number (Spain) in the SDS and can I submit the notification via ECHA Portal?	You may be referring to the Emergency telephone number (section 1.4). In any case, you can contact the Spanish NHD to clarify such a requirement for substances. Their contact details are at: https://echa.europa.eu/-/spain-helpdesk The ECHA Submission portal is for mixtures with regard to Article 45 of the CLP Regulation. If you need to submit information on substances, then indeed we suggest you contact the national authorities on how to submit this information.
I have two different classifications for one substance from different suppliers. This substance appears in different mixtures. Once it is classified as H315, H319 once as H315 H319 H317. How do I introduce two classifications for one substance in IUCLID	You should negotiate with both suppliers to find out why the classification of substance is different.
I notice that the guided dossier preparation tool will be discontinued in April. In the presentation it was stated that all the data will be available in the relevant section. Please can you clarify where this information will go? Please can you also clarify where incomplete guided dossiers will be?	The Guided dossier preparation tool will be decommissioned at the end of April (26 in the Cloud, 28 in stand- alone). The information you have provided will be available under the Mixture widget or the Substance widget, depending on the information. The dossier header you have created will be available under the relevant mixture datasets.
I´m a distributer and want to Notify for EU27, but the supplier of mixture could not provide an UFI with confirmed Notification for all countries. Could I take the UFI and extend the country scope for my own MiM notification?	As a distributor you are normally not required to notify. Your supplier, if downstream suer (e.g. formulator) or importer has the obligation to do that in all MSs where the mixture is placed on the market. If you decide to submit the notification yourself, it has to include the information required by Annex VIII. The same UFI can be used in several Member States and by different submitters as long a the composition of the mixture is the same.
Regarding this subject: what if I have a consumer product with a UFI on the packaging, but I am not sure if UFI is known in the MS I want to sell the product? I cannot submit the exisiting UFI then as a MiM? How can I make sure product info is known if I cannot contact original notification holder?	You can use the UFI to identify a MiM only if you know that this UFI is known to the relevant AB. Otherwise the PC will have no information on the composition. Remember you are responsible for the product you are placing on the market, in particular if this is hazardous. If your supplier did not notify in the MS where you place the mixture on the market, you have the obligation to do so. If you know the full composition and you have to/want to notify , you are supposed to provide the full composition. Talking about MiMs in general, if you know their full composition you are required to include their components at final mixture level, not as MiMs.
the current discussion about rules within the supply chain is not clear (Germany,, versus other states). So If I notify a full composition as a rebrander/distributer, do I overtake the full legal responsibility for the product from the supplier, so am I become a "supplier"?	According to the Guidance interpretation (shared across CLP and REACH and confirmed with the Commission), rebranders and relabellers are distributors, therefore not duty holders under Article 45. Nevertheless they have the responsibility to place on the market mixtures which are CLP compliant. As explained in the Guidance, distributors have the possibility to ask the suppliers to notify or, if this does not happen, they have to notify themselves.
I´ve got one mixture within 4 different packagings. Each packaging currently has an own UFI.	This can be achieved by creating four different packaging records in the one notification. Each record can have it'w own information - some information can also be shared. You can see what I refer to on

To avoid 4 single Notifications - How could I link all UFI´s to one poison center Notification?	pg. 48 of the PCN practical guide https://poisoncentres.echa.europa.eu/documents/22284544/22295820/pcn_practical_guide_en.pdf/ using packaging and non-packaging as an example
I´ve got two mixture with the same composition so i use the same UFI but the SU is different. Can I notify mixtures with only one submission? thank for your response	If the mixtures have the same composition, then they can use the same UFI - but what do you mean by 'SU'? In any case, one submission can be made and if you need to give different information i.e. because they relate to different products, uses etc. then you can do this by creating separate produc records in the notification
If a PCN notification submitted via the ECHA submission portal is additionally submitted via the national system (because the country (Belgium) is not yet ready) will the then already paid fees be due again when Belgium will be ready to accept notifications via the ECHA submission portal?	Does the ECHA Submission portal support invoicing from the appointed body? No, this functionality does not exist in the ECHA Submission portal and such communications will be required to take place through a different channel. You are encouraged to consult with the relevant appointed body before you submit to understand your obligations. You can find this and other Q&A in our website at: https://poisoncentres.echa.europa.eu/questions-and-answers
If supplier cannot give the PH Value, but I knwo that it´s not extrem high or low. I as a distributer could click on "ph is not available" but then what should give as justification because the range between -3 and 15 does not exist?	pH is one of the most important pieces of information for PCs and is required. In case it is not available a justification is legally need and the available list was agreed with Authorities and industry. You should verify with the supplier why it is not available.
If the company had different terminals, what are they supposed to do? Could the company get the UFI code from one terminal and use the same code in different countires? Does the code vary in this case?	Not sure I follow what you mean by terminals. But a UFI can be re-used as long as it points to the same mixture composition.
if the concrete ph-value is not known except that it´s higher than -3 and 15. In that case I will sign "ph-value is not available". What should I sign in the following pulldown menue then?	If none of the agreed justifications is applicable, you are supposed to obtain the pH value via test or from the supplier. Note that this is important information in case of emergency response
If we made notification of our products for one country market, when we need to make notifications for other countries, can we make new notification (same UFI) or we must do update existing notification	You can submit individual notifications per country or update the existing multi-country notification. It depends on how you prefer to manage them and possible updates
If we notify the full composition of a mixture, then we change for some reasons one component by one that fits the rulles of the ICG, how to update the composition? Will this trigger a new UFI?	If you add an ICG to a composition which did not had it originally, a new UFI is required and a 'new notification following significant change of composition' must be made. Only changes in existing ICG do not require a new UFI.
If you have not notified to a country before that currently are not accepting PCNs, how should we relate to them? It is a huge work to comply with local requirements and there are no information if they will accept them tomorrow or ever.	Concerning the notifications as such, you can submit to MS not yet connected. They will remain in the database until the Member States has connected and therefore not be required to be re-submitted. However, until the Member State has accepted these submissions, they are not considered as meeting legal obligations. You can find the contact details of the Appointed Bodies at: https://poisoncentres.echa.europa.eu/appointed-bodies

In chapter 3.1.1.3 of the ECHA Guidance is stated that "The repackaging company can use the same UFI as the supplier (...)" in his notification. How does this work?	The same UFI can be used by different companies and in different market areas, as long as the composition is the same. This is valid not only for repackagers
In my product I have two MIMs without UFIs. Both MIMs contain the same substance, among others. During the validation a business error appears, which says that I should pull the same substances together in the recipe. This procedure is unfortunately very cumbersome.	It should be quality rule , which can be ignored. If this is not the case, please contact us via the contact form by providing more details
In the first session it was told that suppliers are to inform their customers when a UFI is assigned, the way it is submitted (portal or direct to national poison center)and countries where notified. How is this communication to be done?	We do not have any guidelines on the best way forward as it is out of our remit - the advice was merely intended as best practice.
Is it mandatory to use nationally paid emergency numbers in SDSs after reporting?	Yes, it is mandatory to include the emergency phone number of the official advisory body in Section 1.4. You can find further explanations in Section 3.1 SDS SECTION 1: Identification of the substance/mixture and of the company/undertaking of the "Guidance on the compilation of safety data sheets".
Can't we use the general emergency number 112, which is free of charge?	The phone number 112 is not an official advisory body and can by no means substitute it.
Is it obligatory to create different UFI codes in each different countries and terminals? For example, do MSDS and UFI code also need to be integrated for terminals, which are vendors rather than manufacturers?	The UFI is assigned to a mixture composition - therefore the same UFI can be used in all Member States.
Is it possible to duplicate a submission to only change the name of the product and it UFI ?	You can clone a submission - then change any of the information you wish. You can check for more in the PCN practical guide https://poisoncentres.echa.europa.eu/documents/22284544/22295820/pcn_practical_guide_en.pdf/
Is it possible to notify in one dossier different type of packaging for two or more different country (where there are placed in market)? We have the same mixture sold in one country in one size and in another in different packaging.	To have a correspondence between the packaging and the market, you could create 2 separate product records. In each one you can indicate a different packaging and country, while Trade name, use type etc can remain the same. Just make sure that the sum of the countries you include in all product records is the same as the one indicated in the dossier header.
Is it possible to use the previous PCN submission as a template for the new submission and only revise those sections which differ ?	Yes, you can clone a dataset then make modifications how you wish. You can read more from the PCN practical guide https://poisoncentres.echa.europa.eu/documents/22284544/22295820/pcn_practical_guide_en.pdf/
Is it still allowed to use a range for the concentration of hazardous substance of major concern instead of the typical concentration as mentioned in CLP?	Yes, a range can be used for components as long as it is with the ranges set out in Annex VIII (Tables 1 and 2)
Is there a functionality in the system to have an excel overview of all PCN done for which countries and in which languages?	Market area and language are not available search criteria in the submission portal. You can use other search criteria (e.g. date, trade name, etc.) and then export the search results. In the exported

	results you'll see Reference number (UUID), Names, Identifiers (e.g. UFI), Dossier type, Submission number, Submission status, Submission date, Submission type
Is there a limit for numbers of dossiers in the IUCLID Trials environement? Or will this capacity be increased here by the release in April?	The capacity of IUCLID Trial is 10MB. Currently there are no plans to increase it. The increase only refers to IUCLID service version.
Is there a list of European poison centres who are currently accepting notifications using the ECHA portal?	https://poisoncentres.echa.europa.eu/documents/22284544/27487986/msd_en.pdf/982d9115-58cb-75c8-80ae-8eb16f5c0009
Is there a way to get a generate a backup from all data of our company ti export it to a standalone version of IU6? In the last days we had big trouble to access the Cloud, so we are thinking to working with the standalone version.	Sorry to hear you are having trouble with the Cloud. Due to the higher and higher number of Cloud users, the access and the functionalities can get slowed down indeed. You can export all your datasets and dossiers from your IUCLID Cloud instance and import them in the stand-alone version. By exporting, you'll keep the dataset in the Cloud and will be able to have them in stand-alone as well. However, there is no way to keep the 2 versions aligned all the time (no automatic back up).
. I can´t find the option for a general backup in the cloud. Until now I only can bachup each dossier, substance, mixture one after another. How can I make a complete backup in the Cloud?	There is the possibility to Export in bulk. you need to select all the dossiers/datasets and click on "Export", the button below the search field. If you send your question via the ECHA HD, we can reply with some screenshot to better help you.
Is there any way to delete or archive failed submissions in ECHA submission portal?	Failed submissions are considered "events" that actually happened and we cannot "delete history", but need to keep track of those "events". You can filter your submissions in the portal and display only the successfully submitted ones.
Sadly, at the beginning we had many failures :(and subsequently re-submitted and passed, but it seems pointless to have failed submissions if they have gone no further. I wonder if an update in the future that it could be possible to delete 'only' failed?	We do not have plans to allow deletion of failed submissions. They are considered "events" that actually happened and we cannot "delete history", but need to keep track of those "events". You can filter your submissions in the portal and display only the successfully submitted ones.
Is there supposed to be only one UFI code if the formulation of the product is the same yet the name of the product varies?	If the formulation remains the same, the UFI can also remain the same. You can make an update to include the new trade name.
MIM of supplier: about contact of supplier, what mail and phone should be enter? should this informations be the contacts listed in SDS?	It should be the details from an EU company who will be able to provide additional information on the composition if required. Yes, you can use the contact details provided in the SDS section 1.
My company is based in Switzerland and we are launching a new biocidal product. We sell our products in EEA: regarding UFI code, can we appoint our subcontractor manufacturer (based in EEA) for UFI generation? Or in this case UFI code should be importer's responsability (our customers)? Thank you.	The duty holder is primarily responsible for generating the UFI and including it their notification. Of course, there are no checks performed on who created the UFI so it can be prepared by either the manufacturer or by you as long as you do not use a Swiss VAT to generate the UFI. In any case, sound UFI management should be practiced.
New April validation rules: do you know the date when they will be published and implemented? in general, I would suggest to publish updated rules on website some time before implementing them in the portal (at least one month before), in order to make everyone aware in advance of the new rules .	The new rules will be implemented at the same time when IUCLID Cloud is updated. We are aiming to publish new version of IUCLID on 26th April. We aim to publish the Validation rules list (DRAFT) in the coming days.

On my country's website I read that my country is not yet ready, and asks to continue reporting as before in SML. Does one, in such cases, afterwards need to make a PCN notification for a mixture?	Maybe. For mixtures already notified before the Annex VIII compliance date and in accordance with national provisions, a transitional period may apply (see Section 1.4 of Part A of Annex VIII). Therefore, you may not need to comply with Annex VIII until 1 January 2025.
Our customer wants that we decalre a NCS on the PCN portal. Our product is not a mixture so according to article 45 I don't declare it. Could you please confirm my interpretation?	Substances are outside the scope of Article 45 and Annex VIII. They can be voluntarily notified, but the Submission system does not offer a dedicated functionality.
Our supplier in Asia can't give us 100% formulation because he manufactures the product from other raw materials (MIMs). Can we still import the product or will there be new regulation soon?	The principle under CLP is that you need to know the composition of the mixture you are placing on the market (importing is placing on the market). If you lack the full details you may rely on the information provided in the SDS, or your supplier can contact their supplier (maybe the formulator that knows in detail the composition) to make a voluntary submission. You can find these options in the Guidance on Annex VIII, Section 3.3.1.4 Submission of information made voluntarily, Section 4.2.5 UFI and non-EU suppliers and Section 5.3.3 Information on the components.
The speaker indicated that UFI can be included in PCN system or national system . It is my Understanding that UFI applies only to PCN route of submission and not national system. Is that correct?	The UFI is part of the information required by Annex VIII. The Annex VIII defines the format but not the submission system. MSs may have national submission systems in place, as alternative to ECHA one. Yet the information required is the same
Possible to do notifications for products as a distributor for other countries than the orginal target market? Sometimes additional warning stickers are added by distributor and its not possible to verify with manufacturer if article was notified. Can distributor do this in some way? Like CPNP?	You can notify to any Member State that you wish. However, you are recommended to do so when you have a specific (or potential) interest in placing on that market.
How can I notify if I cannot obtain the required information from the original manufacturer/notifier? Like full formulation.	The principle under CLP is that you need to know the composition of the mixture you are placing on the market (importing is placing on the market). If you lack the full details you may rely on the information provided in the SDS, or your supplier can contact their supplier (maybe the formulator that knows in detail the composition) to make a voluntary submission. You can find these options in the Guidance on Annex VIII, Section 3.3.1.4 Submission of information made voluntarily, Section 4.2.5 UFI and non-EU suppliers and Section 5.3.3 Information on the components.
Problems when trying to notify dossiers done from a Legal Entry with permissions but different to the Legal Entry that notifies, are there any restrictions?	Yes, BR570 checks that the submitter LE in the Portal is the same as the LE in the mixture dataset.
Quota of data per subscription in our LE is nowadays 5 GB. Has each LE the same Quota limit? What happens after crossing of Quota limit? Will we be then able to prepare next datasets and dossiers and to submit them to ECHA? Do you intend to increase Quota for LE in future if it occurs necessary?	Each LE has a 5 GB quota. When you hit the limit you get a message inviting you to clean your instance to allow the system to work faster. If you hit the limit, you can still continue using the Cloud but functionalities may get slower. This year ECHA has already increased the quota from 1 GB to 5 GB and we will assess in the upcoming months the need to increase it again.

Regarding products not classified as Hazardous substances, do they need to be notified to ECHA?	Mixtures placed on the market that are not classified as hazardous for physical or human health hazards do not need to be notified to poison centres. You can find further explanations on the scope of Article 45 in Section 3.3 What is the scope of Article 45? from the Guidance on Annex VIII.
Since January 2021 we have often problem with access to PCN. We were not able to connect to IUCLID via our accont for 3 weeks. Nowadays we also time to time have problem with connection to IUCLID from our Legal entity? How come that problems with connection cannot be solved on time?	Thanks for your feedback and sorry for the inconvenience. The slow access to IUCLID Cloud is due to the higher and higher number of users accessing the Cloud. ECHA is working to increase the Cloud capacity and make the access smoother.
Some countries ask for fees, how can we technically pay the fees? We made several notifications in ''paying'' countries, shall we wait for the invoice?	The ECHA Submission portal does not support invoicing from the appointed body. Such communications will be required to take place through a different channel. You are encouraged to consult with the relevant appointed body before you submit to understand your obligations. You can find this and other Q&A in our website at: https://poisoncentres.echa.europa.eu/questions-and-answers
Some countries have specific requirment on which product are to be notified. For example in France an Belgium if i am correct, biocides have to be notified, even though they are not classified as hazardous. Would it be possible to have a document summarizing those requirement country by country ?	Biocides are not exempted from CLP in general nor from Article 45 in particular. National specific requirements are indeed a prerogative of the Member States and therefore outside the remits of ECHA, so we cannot follow up on them.
Still cannot really figure out how to put into practice the solution in which I have one mixture that is sold as three different products in one country. I would like to have a UFI code for the mixture and three separate UFI codes for each of the products. How do I handle this, step by step?	A UFI is assigned to a mixture composition. Therefore, if you want to have a different UFI code for each of your products, you need to assign all codes to the mixture composition. Then you create three different product records in the notification and link each product to it's own UFI and other relevant information.
The specification of a pH value with a sign is not possible (e.g. >=2). Thus, I must specify 2.1 so that the product is not classified as H314/H318. In this specific case I only have the >=2 information from my supplier. So which range should I use?	It is expected that the pH is accurately reported according to the correct value. You can always go back to your supplier and ask for more information. You can use a range also, but in the absence of reliable information to do that, you are recommended to use the actual value.
We are based in the UK, and place our products on the UK and EU/NI market place. We have previously done PCN via ECHA cloud. What are our obligations now? Do we still need to notify to the appointed bodies in the EU and NI to be able to place our products on the market? Do we still use ECHA portal to do our submissions for EU?	Notifications to UK(Northern Ireland) market area must be submitted directly to UK authorities – it will not be possible through the Portal. For this you are required to make contact with the relevant authorities there. We understand that the Department of Health and Social Care are handling Poison Centre notifications so you could try and make contact with them for more definitive information: https://www.gov.uk/government/organisations/department-of-health-and-social-care Holders of an account linked to a UK company will not be able (following the end of the Brexit transitional period) to submit a notification themselves. Nevertheless, they will maintain access to the datasets already created. This applies also to users of the Cloud service. These datasets can be exported and shared with other accounts holders within the EU.

	Other than that, UK-based companies are now non-EU companies and therefore cannot submit any notification. It is up to your customer, EU-based importers now, to take on the notification duties.
We are distributors according CLP (re-labeller) with no direct obligation for PCN notification. Anyway, we are planning to do the PCN notification by ourselves. How can we do the PCN notification? By reporting info on mixture composition listed in sect. 3 of the SDS and then by attaching the SDS? can I notify my product as 100% MiM?	If you want to/have to submit a notification in accordance to Annex VIII, the relevant information requirements have to fulfilled. There is no difference according to the role in the supply chain. Yes, you can notify your product as 100% MiM – you can consult the Guidance on Annex VIII for more information.
We have a 100 % MiM in our PCN dossier. No UFI for it was received from our supplier. We have filled in section 3 of MSDS and contact data of our supplier.The summary of the concentration of the substances is by 30 %. Now Hungarian authority has written that the cocentration summary is not enough.	The legal text requires the supplier's detail in this case, exactly to allow the AB to obtain from them more information if needed. This is particularly of use when your supplier will not provide you with enough information, so the AB can contact them directly.
We have completed the notification via the portal, however there has been an QLT513. Is this normal?	It depends. We would need more information about your submission. It seems like you have submitted an update and added new market areas to the this dossier. In that case, the warning is correct. To better investigate the case, please contact the ECHA Help Desk and provide your submission number.
We have completed the notification via the portal, however there has been no mention of fees by any member state. Is this normal?	Have you checked the Overview of Member States document? Most Member States do not charge fees. You can find the document here: https://poisoncentres.echa.europa.eu/appointed-bodies. Just to add, those that do charge a fee will contact you outside of the ECHA portal therefore we do not have knowledge how they individually work in practice.
We have generated a number of UFI# for our products, before we allocate a UFI number do we need to validate each number first via the Unique Formula Identifier website	It is not strictly necessary as the UFI from the generator is valid. However, we have seen cases where a mistakes have been made e.g. incorrectly typed the UFI. I would err on the side of caution and perhaps check before any labelling or notification takes place.
we have made a notificaton/UFI for a product that is classified with different physcial/ health sentence as well as enviroment sentence. Now there is a change of the composition (nothing add only percentage is changed) and now its not classified with the envirmental sentence any longer.Need new UFI?	A new UFI is needed when the composition changes as described in Section 4.1, Part B of Annex VIII. The Guidance on Annex VIII provides full explanation.
We import mixtures from non EU-countries.Our supplier is a downstream user himself and does not know the 100% formulation. Can I still import this product or is this product no longer marketable in Europe.	The principle under CLP is that you need to know the composition of the mixture you are placing on the market (importing is placing on the market). If you lack the full details you may rely on the information provided in the SDS, or your supplier can contact their supplier (maybe the formulator that knows in detail the composition) to make a voluntary submission. You can find these options in the Guidance on Annex VIII, Section 3.3.1.4 Submission of information made voluntarily, Section 4.2.5 UFI and non-EU suppliers and Section 5.3.3 Information on the components.

We make products outside the EU. A EU distributor is buying them and place them on EU market. I understand we have (as non EU) no obligations to provide an UFI and do a PCN. But can the EU distibutor use our SDS to create MiM? As said in the presentation, suppliers data must be in the EU?	Indeed as non-EU supplier you don't have obligations. But mixtures can be placed on the EU market only if compliant with the EU Regulations, which have the objective to protect the people and the environment. The responsibility is on the EU importer and you are recommended to support them as you wish to place your mixture on the EU market. In absence of enough information, the enforcement authorities may contact the duty holder.
We tried to notify a PPP as MiM. The provider gave us its UFI. In the composition part of our product notification, have we insert the substances of SDS sec 3 appart from the MiM of the provider ? Because we obtained error message:MiM info is incorrect 'You have linked a Reference Substance or a mixture component to your MiM composition. Ensure each component that is linked to your MiM composition corresponds to a Substance dataset.'	To understand the scenario, you notified a mixture (PPP) which includes in the mixture composition a MiM component (100%). The MiM component includes 3 substances which you need to indicate, along with the supplier details. It seems that you might have indicated a MiM in a MiM which is not allowed. So the issue is just the way the components are indicated in the mixture composition document, not a problem with the information itself. The 'Main mixture composition' includes a MiM component only. Once you indicate the MiM component, it creates additional sections that you need to ceate new documents for to enter the relevant information e.g. MiM composition, MiM UFI, MiM supplier...
We use ICGs in our product. The ICGs meet the requirements of Annex 8. Each ICG has a different composition of substances. Can we create only one SDS for our product or do we have to create several SDSs, because the hazard triggers differ due to the different composition of the ICGs.	SDS provisions are laid down in Annex II to REACH. This is outside the scope of this webinar.
What has to be done if a product will be canceled and is no longer availabel on the EEA Market. Is there any requirement to send information on cancelled products	There is no such a requirement for poison centre notifications as products may remain on the market, at several stages of the supply chain, including households, for many years.
What if a MiM supplier sends its UFI when I've already notified my products, what is the reason I have to mention to justify my dossier update?	I would expect you add the update reason as 'other' and include in the remarks field that a UFI has been provided for the MiM. The product identifier has not changed as such, therefore selecting 'change in product identifier' would not suit. Rather this is new information.
what if you only know part of the MIM composition (hazardous substances) but not the non hazardous? Should we then include the hazardous substances or only the MIM?	If you know the full composition of the MiM, then you are supposed to include all its components as the final mixture components. If you don't know the full composition of the MiM, then follow Section 3.2.2, Part B of Annex VIII. If you are not provided with a valid UFI, you can identify the MiM by providing SDS composition and the supplier's details.
What options does an EU importer have if their non-EU supplier wont do neither, submit its own PCN notification via EU-based LE nor provide the EU importer the 100 % composition of the mixture so that the EU importer could submit its own PCN?	A third option is to rely on the information of the SDS, as pointed out in Section 5.3.3 Information required on components of the Guidance on Annex VIII. The underlying principle of CLP, however, is that importers are fully knowledgeable of the composition and hazards of the mixtures they are placing on the market. To that end, relying on a voluntary submission or the information from the SDS are to be considered as work arounds.
When notifying a product as a MiM, do we need to insert supplier details and its product name as they notified it?	If you are including a MiM in your final composition which has no UFI, you should provide a name and supplier's details, besides the SDS composition. The system does not check this information against the supplier's notification so you need extra care when inserting correctly this information.

When notifying for a product that contains a MiM that has been notified by the supplier, does our notification still need to include the known substances contained in the MiM (e.g. from Sec 3 of SDS) even though the supplier has provided a UFI. Would we still need to enter the supplier details? Can we use the same UFI as the supplier for our notification?	If the UFI of the MiM (together with the composition obviously) has been notified by the supplier in the same MS, only UFI and MiM's name are required. Please refer to Section 3.2.2, Part B of Annex VIII and to the Guidance. In principle yes, you can use the same UFI, as long as the supplier has submitted a valid notification, including this UFI, to the same AB.
When specifying the trade names, the system does not differentiate the names in relation to the corresponding countries.	Correct. That was done intentionally to let industry organise its product information as they prefer. If you want to separate Trade names and relevant countries, you can create several product records: in each of them you can include the Trade name and the countries of interest.
Why some EU countries were still not connected to the PCN even though they already have valid legislation requiring notification in the PCN? Are there any problems with IT safety? When approximately could we expect that all EU states enforcement authorities will have the access to PCN?	Member States are in varying stages of connecting with ECHA while being committed to accepting portal notifications shortly after 1 January 2021, at least for consumer and professional products. For your information, we are updating the Member States Overview table regularly to include the information received. We acknowledge that there are a number of Member States for which we have no conclusive information. You need to contact the Member State directly to find out more, as it is within their remit to decide how and when to accept these submissions. You can find their contact details at: https://poisoncentres.echa.europa.eu/appointed-bodies Concerning the notifications as such, you can submit to MS not yet connected. They will remain in the database until the Member States has connected and therefore not be required to be re-submitted. However, until the Member State has accepted these submissions, they are not considered as meeting legal obligations.
Will it be possible to do notifications in the ECHA portal for Northern Ireland?	Notifications to UK (Northern Ireland) market area must be submitted directly to UK authorities: it will not be possible through the Portal. For this you are required to contact the relevant authorities there. I understand that Department of Health and Social Care are handling Poison Centre notifications so you could try and make contact with them for more definitive information https://www.gov.uk/government/organisations/department-of-health-and-social-care
Would it be possible to update notifications in order to remove a country of distribution in case a EU country has been entered by mistake? Thanks	No, currently this is not possible. A solution will be presented by Claudia Rimondo during this webinar for the October release, where by you can indicate a cease market.