

For industry by industry: how you can prepare?



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ECHA Webinar: Notifying hazardous mixtures to Poison Centres:
What you need to know

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Know your obligations: Notify



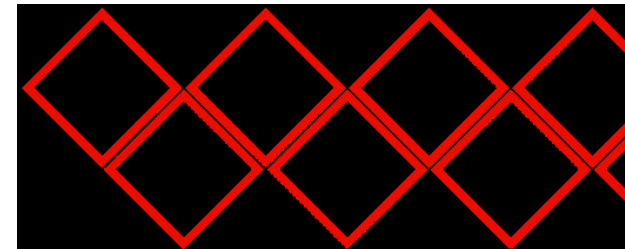
- Who:
 - Importer or Downstream User that places mixtures on the market.
- What:
 - Mixtures classified as hazardous for **human health** or **physical hazard**.
 - Excluded: Mixtures classified for environmental hazards, gases under pressure or explosives.
- When:
 - Mixtures for consumer use: From January 1st 2020
 - Mixtures for professional use: From January 1st 2021
 - Mixtures for industrial use: From January 1st 2024
 - **Before placing in the market!**
- How:
 - Using an harmonize Poison Centre Notification (PCN) format.
- Where: 2 options
 - Directly to the appointed bodies of the Member States where the mixture is placed on the market.
 - Through the ECHA PCN portal.



Required information 1/3



- General information
 - Product identifier
 - Identifiers (e.g. CAS, EC number...) of mixture components
 - Unique Formula Identifier (UFI)
 - Contact details of the submitter
- Hazards identification
 - Classification of the mixture and label elements
 - Toxicological information



Required information 2/3



- Information on mixture components
 - Components of the mixture and their concentration, even not classified as hazardous.
 - Concentrations can be expressed as exact percentages or as a range of percentages.
 - Major concern components have tighter concentration ranges than other components, they are:
 - Acute toxicity, Category 1, 2 or 3,
 - Specific target organ toxicity, single and repeated exposure, Category 1 or 2,
 - Skin corrosion, Category 1, 1A, 1B or 1C,
 - Serious eye damage, Category 1.

Required information 3/3



- Additional information
 - Type(s) and size(s) of the packaging
 - Colour(s), physical state and pH of the mixture
 - Product category according to the EU Product Categorisation System (In preparation by ECHA)
 - Use (consumer, professional, industrial)



Know your portfolio



- Identify mixtures that require submission of information.
- Identify the use of your mixture (consumer, professional or industrial)
- For industrial mixtures it is possible to do a limited submission of information.
 - Less information requirements than for consumer and professional mixtures.
 - Companies should provide a telephone number with a 24/7 on call service and an email address for rapid access to additional information.
- Generic identifiers: “perfumes”, “fragrances” or “colouring agents”
 - Components not classified for health hazard
 - “Perfumes”, “fragrances”: Concentration does not exceed 5% in total
 - “Colouring agents”: Concentration does not exceed 25% in total

Know your portfolio



- Group submission: all mixtures in the group contain the same components, the reported concentration range is the same for all mixtures.
- Mixtures in mixtures (MiM): Do I know the full composition?
 - Contact the supplier for further information on the exact composition of the MiM
 - Provide information on known mixture components, the product identifier of the MiM together with its concentration and the UFI.
 - When the UFI is not available, information on known mixture components, the product identifier and concentration of the MiM together and the SDS, name, email address and telephone number of the MiM supplier should be provided.

Getting prepared



- Time flies! Start now.
- Identify mixtures affected by Annex VIII of CLP
- Identify the use to determine the deadline (Consumer, professional or industrial use)
- Check your mixture composition and assign ranges (or exact %)
 - REMEMBER: different ranges depending on the classification of the substances.
- Make sure your data are up to date.
- Monitor and manage changes: possible updates
- Consider a budget for the necessary IT tools and resources
- Start assigning UFI to your mixtures.

Getting prepared



- Product categorization system (EU PCS): it defines mixtures according to intended uses.
 - Mandatory to use it.
 - One product can fit in several categories

Submit your product information



- Work in progress
 - ECHA portal?
 - ECHA database?
 - Directly to the National appointed bodies?

<https://poisoncentres.echa.europa.eu/>

A screenshot of a web browser displaying the ECHA Poison Centres website. The browser's address bar shows the URL 'https://poisoncentres.echa.europa.eu/poison-centres-notification-format'. The website header features the ECHA logo, a search bar, and navigation tabs for 'Information', 'Tools', and 'Support'. The main content area is titled 'Poison Centres Notification format and editor' and contains text explaining the PCN format and a link to a draft PCN format. A sidebar on the left lists navigation options like 'Home', 'Information', and 'Tools'.

Secure | <https://poisoncentres.echa.europa.eu/poison-centres-notification-format> ☆

Log in > **ECHA**

Poison Centres

Search Poison Centres Website

Information Tools Support

Poisoncentres > Tools > Poison Centres Notification format and editor

Home Information Tools

Poison Centres Notification format and editor

Poison Centres Notification portal

UFI Generator

Poison Centres Notification format and editor

The poison centres notification (PCN) format defines the data requirements and structure for the submission of information to poison centres in an XML format. It has been developed for the benefit of poison centres and companies and may be particularly useful for companies dealing with a large number of formulations. A draft version can already be downloaded below. However, be aware that this is not the final version as the tool will be updated in 2017. See more about timelines under *Poison Centres Notification portal*.

[Draft PCN format \[ZIP\]](#)

Poison Centres Notification editor

The PCN editor is the basic application that can be used by companies to prepare and update files for the submission of information to poison centres in the harmonised format. It has been developed for the benefit of poison centres and companies and is particularly intended for small and medium sized enterprises. You can already familiarise yourself

Keep the information up to date



- When is an update required?
 - The mixture product identifier (including UFI) has changed, or
 - The mixture classification for health and physical hazards has changed, or
 - Relevant new toxicological information is available, or
- Consider if a new notification is required or just an update:
 - The composition of the mixture has changed.

Challenges to industry



- Very complex regulation: New obligation in addition with the already upcoming deadlines, last registration, changes in IUCLID, REACH updates...
- Resources have to be dedicated to fulfill this new obligations: training and support will be critical
- Definitions still need to be clarify
- Knowledge of uses along the supply chain is not always possible, confidentiality, competition law...
- Timelines very tight. New IT tools and guidance will be ready shortly before the entering into force, no time to get acquainted with the system
- There are still workability issues under discussion on compositional information in some sectors (petroleum products, construction sector etc...)
- Protection of sensitive data and confidentiality needs to be guaranteed by ECHA and all the appointed bodies
- Fees in some MS: creates competitiveness issues

Next steps



- Commission, ECHA, Industry and Appointed Bodies are working towards:
 - Creating a workable system
 - Achieving harmonization throughout Europe to provide information for emergency response
 - Collecting data in a useful manner
 - Providing all the stakeholders support and guidance.





Thanks for your attention!

Questions?