

ECHA webinar: using the UFI for your products and mixtures – Q&A transcript

Session number: 702540083

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Starting time: 10:44

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

Q: Hello, when we export a product to one country, where do I have to notify the product? Where can I find the right address and the necessary information I have to give?

-Panellist 2

A: A bit outside the scope of this webinar, but at present you notify the relevant body of the country you will export to, in accordance with their current requirements. The national CLP helpdesk can give further advice. - The national helpdesk details are on our website under Support - National Helpdesks.-

Q: Is there an update on the workability study and when it will start?

-Panellist 5

A: Unfortunately, we are only able to answer questions related to the content of this webinar. Please use our contact forms to submit your question at: <http://echa.europa.eu/contact/> -

Q: Hello, could you please provide an example of when a product can have several UFI codes?

-Panellist 6

A: Your question will be answered in the upcoming presentations. If you miss the answer to your question, kindly resubmit your question before the end of this webinar.-

Q: Good morning, I have a question about the transition period with MiM. How does this work if we would like to register a product, but one of the suppliers is still covered by the transition period and doesn't have a UFI?

-Panellist 8

A: Hello, either the supplier has to disclose the full chemical composition of their mixture with you or they need make a new submission in order to submit this information for the use of poison centres and to provide the UFI code to you.-

Q: UFI number on the label has to be a barcode?

-Panellist 3

A: Hello, no the UFI code is a number and not a barcode-

Q: Is possible to download the slides?

-Panellist 1

A: The presentations and a video recording will be published in the webinar section of our website shortly after the event. All participants will receive a link to their email.-

Q: How can I check that the UFI of the Mixture is available for the national Poison Center needed for the final product?

-Panellist 5

A: Your question will be answered in the upcoming presentations. If you miss the answer to your question, kindly resubmit your question before the end of this webinar.-

Q: Hello, when will the revised Guidance on labelling will be published?

-Panellist 2

A: Its publication is foreseen to takes place by the end of this year.-

Q: Is a UFI only required for products carrying a human or environmental health hazard?

A: A UFI is a legal requirement only for mixtures classified hazardous for human health or physical hazards, but not for environmental hazards only. However, a voluntary submission and creation of a UFI for non-hazardous mixtures is possible and recommended to provide to the poison centres as accurate information as possible. (Putting the UFI on the label is optional).

Q: Could you please specify also in the ECHA guidance on Annex VIII the fact that the UFI must be printed in section 2.2 of the SDS?

-Panellist 2

A: Yes, we will. As 2.2 must include the label elements, it is the place where the UFI must also be (when it is on the label).-

Q: Will Brexit have an impact on companies using UK VAT numbers in their UFI?

-Panellist 2

A: Possibly. Unfortunately, it is not yet clear what the exact effects will be.-

Q: I note that the algorithm used to create the UFI is publically available. Based on this, is it possible to reverse the algorithm to determine a VAT number from a UFI?

-Panellist 3

A: Yes. It is also possible to use a company key instead of using the VAT number, you will get a company key from the UFI generator tool:
[https://ufi.echa.europa.eu/#/generate-](https://ufi.echa.europa.eu/#/generate)

Q: Any support, guideline or recommendation about an embedded own UFI generation available?

A: Please consult the Poison Centres website on section Tools – UFI and the [UFI Generator Manual](#)

Q: Would the product for industrial use need the UFI number on the label? As I understood, the UFI for industry usage would be needed only on the SDS. Am I right?

-Panellist 2

A: Yes, it is possible to only place the UFI in the SDS for industrial use mixtures. Annex VIII, part A, 5.3-

Q: What if the company does not have a VAT number, what can you use instead?

-Panellist 10

A: Yes, UFI Generator also allows to create an UFI in the case the company haven't a VAT number. Company only needs to assign a formulation number to the mixture to create an UFI.-

Q: Can UFI be on the label even if mixture not yet notified?

-Panellist 5

A: Companies can start generating their UFIs and perform internal preparations such as the mapping with internal formulation codes. Placing the UFI on the product label before 1 January 2020 is not mandatory, but is possible.-

Q: Is UFI needed for mixtures classified only for environmental hazards?

-Panellist 2

A: No, it is not required, but it is allowed and in some cases can be useful.-

Q: How to proceed when the notification is prepared by an Only Representative on behalf of a non-EU manufacturer, what VAT needs to be used, a non-EU manufacturer does not have a VAT only a tax number in their countries outside the EU

-Panellist 2

A: Please note that obligation lies with importers and downstream users (based in the EU). It does not apply to manufacturers from non-EU countries. For more information see the user guide for generating the UFI. Also the case of no VAT is explained therein. The guide is available on our Poison Centres website.-

Q: What is the definition of customer, professional and industrial user in terms of UFI N° and Poison centers

-Panellist 8

A: Hello, consumer, professional and industrial use refer to the end use type of the product on the market. Please note, if your industrial mixture ends up in consumer product, it will be considered as intended for consumer use. -

Q: using the VAT of the Only Representative does not seem right as he does not place it on the market

-Panellist 5

A: You should use your own VAT, but in some cases you can use the VAT of a mother/daughter company, for example.-

Q: How do we obtain VAT number?

-Panellist 6

A: A value added tax identification number or VAT identification number is an identifier used in many countries, including the countries of the European Union, for value added tax purposes.-

Q: is it mandatory to put the UFI on the section 2.2 of the SDS?

-Panellist 2

A: Yes, if it is on the label. 2.2 must contain the label elements.-

Q: Could you confirm that the UFI number is mandatory to display in the SDS in section 2.2?

-Panellist 2

A: Yes, if it is on the label. 2.2 must contain the label elements.-

Q: Hi, our products are already notified to the Swedish poison center. Is our deadline 2025?

-Panellist 5

A: Provided that they do not make any changes or update, yes, your deadline is 2025.-

Q: If the UFI changes, is it necessary to make a new revision of the SDS (since the UFI is in section 2.2 of the SDS)?

-Panellist 2

A: This is not clear yet. An update of the SDS is required when a change affects risk management. The effect of the UFI change without change in composition should probably not be such that it leads to immediate update need.-

Q: Is the UFI obligatory for CONSUMER mixtures Safety Data Sheets in section 2.2??

-Panellist 2

A: When there is no requirement for an SDS, then the UFI does not lead to the requirement to provide an SDS, either.-

Q: In Annex VIII there is no obligation to list it under section 2.2 of the SDS. Is it really an obligation for consumer and professional use? Where does this obligation come from?

-Panellist 2

A: UFI is a label element, label elements are given in section 2.2 SDS. Obviously, if there is no requirement for an SDS, this is not relevant.-

Q: If the same product is sold in several countries under same company responsibility but with different VAT numbers, is it necessary to modify the UFI for each VAT number or the same one can be used in all countries?

A: The VAT number of a mother company can be used to generate UFIs and daughter companies are free to use them as long as the mixture composition is the same.

Q: Can a VAT number of a Swiss company be used for making UFI?
-Panellist 3

A: The UFI tool is to be used for notification obligations under Article 45 of the CLP Regulation in the EU and the EEA. The CLP Regulation does not apply in Switzerland, as Switzerland is not a member of the EU/EAA.-

Q: Will we also get an overview of all questions and answers after the presentation?
-Panellist 1

A: We do not provide the full Q&A transcript to participants due to confidentiality issues. Questions identified as general interest, will be visible in the Q&A panel during the webinar.-

Q: So if you have confidentiality concerns of the suppliers identity you should not use the VAT number to prepare UFIs?

-Panellist 5

A: A company key should only be used for companies that do not have a VAT number, though it could be possible in case of confidentiality issues.-

Q: Is there an update on the workability study and when it will start?

A: Unfortunately, we are only able to answer questions related to the content of this webinar. Please use our contact forms to submit your question at:
<http://echa.europa.eu/contact/> -

Q: Could you confirm that we don't have to put the UFI on the secondary packaging?
-Panellist 2

A: This is the current understanding, but as the guidance is still under development and discussion, it is not possible to be 100% sure.-

Q: Good Morning. We manufacture products for our brand and for our customers. For the same formula, should we put the same UFI number even if we are not responsible for placing it on the market?

-Panellist 5

A: You can if you want. You can also give different UFIs.-

Q: Is it mandatory to add the UFI in section 2.2 of SDS for product intended for professional or consumer use?

-Panellist 2

A: UFI is a label element, label elements are given in section 2.2 SDS. Obviously, if there is no requirement for an SDS, this is not relevant.-

Q: Is it required to have the UFI being displayed on outer packages such as postal packages or boxes containing say 10 consumer units for warehousing in retailers?

-Panellist 5

A: No, the UFI must always be on the label.-

Q: In Appendix VII is not mentioned to mention the UFI in the safety data sheet. Does the UFI have to be mentioned in the SDS?

-Panellist 2

A: UFI is a label element, label elements are given in section 2.2 SDS.

Obviously, if there is no requirement for an SDS, this is not relevant.-

Q: If the original manufacturer has already placed a UFI on a product, are there any situations where one would need to create a new one / replace the already existing UFI (assuming one's company is in scope of this obligation)?

-Panellist 8

A: Hello, as explained in presentation 3, under certain conditions, changes to the mixture composition require the change of UFI. -

Q: If there are changes in the mixture a new UFI is needed, am I right?

-Panellist 6

A: Yes, you are right. Your question will be answered in the upcoming presentations. If you miss the answer to your question, kindly resubmit your question before the end of this webinar.-

Q: Hi guys, sorry if asked already but I assume the presentation will be made available soon? Thanks!

-Panellist 1

A: The presentations and a video recording will be published in the webinar section of our website shortly after the event. All participants will receive a link to their email.-

Q: Is a mass run UFI generation possible? e.g. EXCEL or ACCESS DB import to online UFI Generator and then export it to import it later on in the enterprise system?

-Panellist 3

A: The UFI generator supports web services, please consult the UFI developer manual :
https://poisoncentres.echa.europa.eu/documents/22284544/22295820/ufi_developers_manual_en.pdf/9d47a5c9-ba58-4b5c-8101-7d5610928035-

Q: What will happen with UFI if mixture has professional and industrial use? Do we will use the same UFI for both uses?

-Panellist 10

A: Yes, you can use the same UFI for both.-

Q: You've mentioned that from the UFI the VAT-number of the supplier can be derived. If our customer uses our mixture in his mixture, this would enable a 3rd party to gain information on his supply chain, i.e. who is his supplier - which is a problem!

-Panellist 2:

A: Your customer will use your UFI to declare your mixture as a component to his mixture but he will need to assign his own UFI to his final mixture and only this UFI will be visible on the label.

Q: What does <<the components should "ideally" sum up to 100%>> mean in practice? In the past the level detail Poison Centers required for compositions was different depending on the country. (I.e. how narrow do concentration ranges need to be?)

-Panellist 5

A: Please, refer to Annex VIII of CLP Regulation for more detailed info. Unfortunately, we are only able to answer questions related to the content of this webinar. Please use our contact forms to submit your question at:
<http://echa.europa.eu/contact/> -

Q: What happens if customers and poison centres do not have a UFI from an upstream supplier because the transition period does not oblige them to make a notification?

-Panellist 6

A: Only as of 2025 Poison Centres will have full visibility of all products submitted.-

Q: If there are changes in the mixture a new UFI is needed, am I right?

A: Yes, you are right. A new UFI is needed if there are changes in the mixture composition going beyond the allowed variation specified in table 3 of the Annex VIII. Any other changes do not require the new UFI but you can do so for business reasons.

Q: Where is UFI number placed on the label?

-Panellist 2

A: There is no clear requirement for this in the legal text. It will be addressed in the Guidance document on labelling and packaging. The main thing is to have it clearly visible and distinguishable on the label.-

Q: How to deal with compositions, where the sum of ingredients is above 100%, which can happen, if concentration ranges on component level apply?

-Panellist 5

A: Please, refer to Annex VIII of CLP Regulation for more detailed info. Unfortunately, we are only able to answer questions related to the content of this webinar. Please use our contact forms to submit your question at:
<http://echa.europa.eu/contact/> -

Q: Can the UFI of a MiM have been communicated to a certain poison center, different from the poison center that will receive the information for the final product?

-Panellist 6

A: Sharing information on UFI of a MiM is under discussion. We are aware that in case of cross-border supply chain a link to UFI may be broken.

Q: As a paint producer, if we can use the UFI of our MiM provided by our suppliers, the timelines for submission are inverted. Shouldn't the Industrial use be submitted first in order to simplify the full chain registration process?

A: We are not in the position to comment on the deadline specified in the legislation. You may however address it to the European Commission.

Q: If I have to register one product in one country do I have to do it again in another country if exported to or will one registration be valid in the whole EU?

-Panellist 2

A: Yes, the current system of submitting the information to every country where you place the mixture on the market will continue. However, the new portal may be used for sending the notification to the different countries.-

Q: Do the concentration ranges for the UFI also have to appear the same way in the MSDS? Or is this independent from each other?

-Panellist 2

A: They are independent.-

Q: How to submit composition information if MiM are used without knowing all components or UFI?

-Panellist 5

A: You really need to get one or the other from your supplier.-

Q: If we buy a mixture (UFI 1) and sell it without changing the mixture, do we have to register the additional trade name with a new UFI or can we/ have to use the UFI of our supplier?

-Panellist 10

A: You can use both, a new UFI or to use the UFI of your supplier.-

Q: from the examples given: can you talk us through the following scenario; what if a MIM is not hazardous and no UFI is provided by the supplier? What information to provide as part of the notification?

-Panellist 6

A: It is possible that the supplier can make a voluntary submission and provide the UFI, but indeed it is not enforceable. Normally it is expected that you know some information about the product/mixture you buy (for example CAS number).

Q: For consumer products that UFI will be on the label, is it compulsory to include it in the SDS as well?

-Panellist 2

A: SDS are not required for consumer products, but if you do prepare an SDS on request, you do have to include the UFI in 2.2 as the UFI is a label element.-

Q: Hello. If we know the recipe of all components for our Mixture, are we allowed to use the UFI of components (sometimes ready mixed mixtures from suppliers). Or should we list every single component by its original name in SDS and Upload to Poison Centre?

-Panellist 10

A: UFI are associated to chemical mixtures, not to individual components. You can get detailed information in Annex VIII of CLP regulations about how to provide information of components and Mixtures in Mixtures-

Q: Page 44 and 45 UFI#1 component mixture not equal to UFI#1 product Correct?

-Panellist 5

A: Each slide lives by itself. UFI# on slides are not related.-

Q: Hi, did I understand correct that the rules for concentration ranges for information for UFI which are shown on Annex 8 are different from the rules for showing ranges on SDS Sect 3? Thanks.

-Panellist 2

A: Yes, that is correct.-

Q: Can I submit one notification including several UFIs? Or do I need to submit one notification per UFI?

-Panellist 6

A: Yes, you can.-

Q: For generating multiple UFIs I need multiple formulation numbers. If I want a UFI for every Product Name of a composition I need to map an Identifier for every Name and generate a UFI. Is this Correct?

A: Yes, this is correct.

Q: Will you provide guidance on substances in bulk ie use as fuel ?

A: Not for the time being, we are awaiting the results of the workability study for petroleum sector.

Q: In which cases does the UFI code need to be displayed on the label?

-Panellist 2

A: For all mixtures classified for physical or health hazards, the submission of emergency information is required. The UFI is required on the labels of mixtures for consumer and professional use. For industrial use, UFI can be just in SDS.-

Q: So if you have a VAT number you are not obliged to use it to prepare the UFI?

-Panellist 5

A: A company key should only be used for companies that do not have a VAT number, though it could be possible in case of confidentiality issues.-

Q: just for confirmation; 1 composition -> 1 UFI but could be covered several trade name?

-Panellist 5

A: Yes. As long as the composition is the same, UFI is the same.-

Q: We manufacture products for our brand and for our customers. For the same formula, should we put the same UFI number even if we are not responsible for placing it on the market?

-Panellist 5

A: It is up to you. UFI is flexible and you can allocate more than one UFI for a mixture composition. You can also decide that you and your customers use the same UFI. -

Q: It is my understanding that different companies can share a VAT number - is there a danger that 2 separate companies might generate the same UFI?

A: In theory yes, for example if all daughter companies use the VAT number of mother company. We advise that the mother company is in charge of managing the UFIs to minimize the risk that you mention.

Q: How about industrial use mixtures, where on the sds the UFI should be added? In section 2.2 or 15?

-Panellist 2 - 12:08

A: Section 15. (Section 2.2 is only for label elements.)-

Q: Formulations are often closely guarded secrets and as such proprietary information, what measures will be in place to protect this information?

A: The Security Officers' Network will discuss the IT Security measures which will be applied for the notification portal-

Q: Is it required to have the UFI being displayed on outer packages such as postal packages or boxes containing say 10 consumer units for warehousing in retailers? Your answer was "no, UFI must be always on the label" But boxes need CLP label!

-Panellist 2

A: Please see the Guidance on labelling and packaging about labelling of consolidated packaging. The issue of whether the UFI should be on all CLP-labelled layers is still under discussion. To our current understanding the immediate packaging should be enough-

Q: What kind of characters may the formulation number for the creation of an UFI include? Does the generator only accept numbers, or does it also accept letters (difference between upper case and lower case?) and special characters like hyphens?

-Panellist 3

A: Formulation no. is numerical only – between 0 and 268 435 255 so no hyphens or upper/lower case characters-

Q: If the Only Representative uses his own VAT what happens if there is an Only Representative change?

-Panellist 10

A: There is no concept of Only Representative under CLP. Obligation lies with importers and downstream users based in the EU. Should a company use a 3rd party to help in the notification process, the UFI should be generated based on the VAT number of the duty holder not of the 3rd party.

Q: As an example, if a formulator sells to a refiller. The refiller uses the formulators UFI as only re-filling. The refillers customers could calculate the VAT number of the formulator and bypass the re-filler creating huge issues for the refiller.

A: The refiller can generate their own UFI and inform the formulator of it so that the formulator can add it to their submission.

Q: But if we have a MiM but know the complete recipe, are we allowed to use the UFI's delivered by supplier in the SDS?

-Panellist 2

A: If you know the full composition, you should provide it.-

Q: Hello. If we have multilingual label for selling products in different countries, we need one UFI for each country? Thanks

-Panellist 2

A: No, you do not.-

Q: UFIs need to be given in the SDS, Section 2.2. In the case of mixture-in-mixtures this would enable other parties to gain insight into the supply chain (who supplied the contained mixtures), as the UFI allows tracing the VAT of the supplier. Correct?

-Panellist 2

A: The UFI must be on the label, anyway. But, indeed, your observation will be forwarded for future considerations.-

Q: Is a UFI only needed for products carrying a human health hazard?

-Panellist 10

A: It is possible to use UFI for other mixtures without a human health hazard in a voluntary way (e.g. hazardous for the environment).-

Q: Can we prepare UFIs for our customers who sell our mixture under different trade names? Do they have to use them or can they prepare their own UFIs?

-Panellist 5

A: In principle, UFI is linked to the mixture composition, not to companies that generated the UFI. So, you can generate UFIs for your customers and they can use them (if they do not change anything in the mixture composition).-

Q: If one of the components of my formulation is not classified as dangerous and I don't receive a UFI for this MIM, how can I manage this when I submit my formulation to the poison center?

A: It is possible that the supplier can make a voluntary submission and provide the UFI, but indeed it is not enforceable. Normally it is expected that you know some information about the product/mixture you buy (for example CAS number).

Q: Using the VAT of the Only Representative will imply legal obligations to the Only Representative? My question is because the OR is not placing the mixture on the market or are there any legal obligations for an Only Representative under article 45 of CLP?

-Panellist 2

A: CLP does not include the concept of OR. The VAT number is only a tool to be able to create a unique number.-

Q: For UFI generation, will the system accept a letter as part of the formula number?

-Panellist 3

A: Formulation number is numerical only, the number is between 0 and 268 435 255 -

Q: Can we prepare UFIs for our customers who sell our mixture under different trade names? Do they have to use them or can they prepare own UFIs?

-Panellist 6

A: You can prepare UFIs for your customers, but it is possible for them to create their own UFI.-

Q: why is it limited to 268435255?

-Panellist 1 - 11:42

A: This is due to technical limitations during the development of the technical tool.-

Q: How is the IT security of the transmitted recipe information guaranteed?

-Panellist 3

A: Security Officer Network will discuss the IT Security measurements which will be applied for the notification portal-

Q: If the mixture has to have 2 UFI but one is provided by supplier later than other. So will I wait to have 2 UFI available to put on label, or put one?

A: Your question is not clear, please contact ECHA helpdesk.

Q: Hello, is it possible for consulting companies to create UFIs and make the submissions on behalf of other companies?

-Panellist 5

A: Yes, it is possible that consultant prepares UFI and the notification on behalf of the customer BUT the submission itself has to be performed by the duty holder. Preferably the consultant should create UFIs using the VAT number of the customer.

Q: In which section of the sds the UFI of industrial mixture should be added?

-Panellist 2

A: 15-

Q: If we reformulate a product, a new UFI has to be generated. Does this mean that we have also to change our internal formulation code?

A: Yes.

Q: When developing new products for field testing will a UFI be required? If not, at what point should a product be registered with a UFI? If so, I feel that this will hamper innovation, how will you ensure this is not the case?

-Panellist 5

A: Research and developmental products are excluded.-

Q: To minimise packaging waste products are sold in refill packs to be refilled in a trigger spray bottle by consumer. How consumer keep a record if the refill pack will contain a UFI different from the formula being sold in the original bottle?

-Panellist 2

A: Good question :). Fortunately, the UFI is not the only identifier that the poison centre will use to identity a mixture.-

Q: If a product trade name changes but the mixture formulation remains the same may I use the same UFI?

-Panellist 6

A: Yes, as long as a mixture remains the same you can use the same UFI. However, note that Poison Centres will need to have up to date information for products/mixtures. -

Q: Hello, is it possible for consulting companies to create UFIs and make the submissions on behalf of other companies?

-Panellist 5

A: In principle, UFI is linked to the mixture composition, not to companies that generated the UFI. So, you can generate UFIs for your customers and they can use them (if they do not change anything in the mixture composition).-

Q: Does a mixture with only a EUH208 warning need a UFI?

-Panellist 2

A: No, a submission is not required and thus the UFI is not required to be included on the label, either. But it is possible to do both and sometimes this can be useful.-

Q: If you are selling Private Labelled products can the UFI be UFI of the original manufacturer? If it is who should submit to the poison centre, the manufacturer or the brand owner?

-Panellist 5

A: The draft guidance says that the formulator who produces the mixture has to submit the information.-

Q: How is it guaranteed that the information is "safe" at the poison centres?

-Panellist 6

A: ECHA Security Offices Network is currently working on establishing a security model. More information will be available later.-

Q: Please consider that if the UFI changes and it is on the SDS, but there is no need to make a new revision of the SDS, there will be an inconsistency between section 2.2 and the actual label. Could you please clarify this point in the ECHA guidance?

-Panellist 2

A: Thank you for your comment. We will take this into account.-

Q: Is it possible to print the UFI on the package and not on the label so as to be easier to update it if required?

-Panellist 2

A: Unfortunately this is not possible.-

Q: How do you create a VAT number for your company?

-Panellist 10

A: To know how to generate a VAT number, consult the national administration related to economy.-

Q: Where should the UFI be printed on? On Label? ON box? On both? Must be printed

-Panellist 10 - 11:49

A: UFI has to be on the label in a visible place. It is possible to print it on the label or to affix it.-

Q: A very good webinar. Thank you!

Q: Will you provide a transcript of these Q&A session? Would be appreciated! Many Qs and its As are interesting for me!

-Panellist 1

A: We do not provide the full Q&A transcript to participants due to confidentiality issues. Questions identified as general interest, will be visible in the Q&A panel during the webinar.-

Q: If you change names of the product but not the formula, do you need to change UFI then?

-Panellist 5

A: No, if the composition remains the same. However, you need to update your notification to allow Poison Center to know about the change of the name.-

Q: Do we need a UFI for an R&D sample? We send out these in a variety of pack sizes which are much smaller than those for commercial sales.

-Panellist 6

A: No, certain mixtures are excluded, please see Annex VIII for more details.-

Q: If I submit the notification to member states poison center and do not use the central notification portal: do I need to use the UFI as well?

A: Yes. The UFI is a legal requirement of CLP regulation Annex VIII. However if you notify under national legislation before the entry into force of Annex VIII (from January 2020) you can benefit from the transition period until 2025 - provided there are no changes to your mixture.

Q: Hello. Could you explain again when is mandatory to reprint a label when UFI changes?

-Panellist 2

A: Please see the leaflet UFI in brief on our website:-
<https://poisoncentres.echa.europa.eu/support->

Q: Thank you for this webinar

Q: Are UFI's also required on products that are only sold in bulk, so that have no label?

-Panellist 10

A: Yes. In this case there is no label, but you have to indicate the UFI in the SDS in the appropriate section (section 15).-

Q: Please send us the Q&A from this session, thank you in advance

-Panellist 1

A: We do not provide the full Q&A transcript to participants due to confidentiality issues. Questions identified as general interest, will be visible in the Q&A panel during the webinar.-

Q: Should UFI be on the website when product is sold online?

-Panellist 6

A: No, the regulation obliges the UFI to be on the label and in the submission (or SDS if derogation applies).-

Q: 2020 is fast approaching. This is why industry needs the results of the workability study as there are still many devils in the detail.

-Panellist 5

A: This is out of scope of today's webinar. However, this Commission run study has kicked off and results are expected at the beginning of next year.-

Q: Where we can find the slides presentation?

-Panellist 1

A: The presentations and a video recording will be published in the webinar section of our website shortly after the event. All participants will receive a link to their email.-

Q: I have a question. In the SDS we do not have all the composition. We are importers and our supplier only put the substances that are classified. Will it be ok to make the declaration?

-Panellist 10

A: If the product is only for industrial use, you can provide only SDS and a telephone number to be in contact 24 hours / 7 days per week. If the product is for professional or consumer use, this information is not enough. Consult Annex VIII of CLP regulation-

Q: Will it be possible to report a formulation to all EU poison centers at a time?

-Panellist 5

A: In principle, the use of the central system allows that. However, that is still under discussion. -

Q: Is it possible to use several UFIs with one mixture submission (in case one mixture has several UFI-s)?

-Panellist 6

A: Yes, it is possible. Though only one would be required on the label.-

Q: Does UFI need to be a part of CLP label?

-Panellist 2

A: Yes.-

Q: If a product has different formula but same commercial name and we assigned 2 different UFIs and notify them?

A: Yes, the UFI is dependent on the chemical composition of the product, therefore you need to assign the UFIs according to the mixture not the trade name. This requires two separate submissions.

Q: Hello and thank you for this presentation; it was very clear; it will be possible to recuperate the Power Point presentation please?

-Panellist 1

A: The presentations and a video recording will be published in the webinar section of our website shortly after the event. All participants will receive a link to their email.-

Q: When I want to notify my mixture containing MIM for which is not available UFI yet can I add MSDS of these MIMs in EN version only for whatever country when is my mixture placing on the market?

-Panellist 5

A: Attaching SDS for a MiM will be possible until the end of the transition period 2025. The submission should be made entirely in the language of the member state. Contact the member state to ask if they would accept an SDS in English.

Q: Will one submission be valid in the whole EU or will I have to submit one product in several countries the product is exported to?

-Panellist 6

A: It is possible to make one submission for every Member State you place on the market. -

Q: if I receive a UFI from a supplier, am I due to verify that such UFI corresponds to an existing notification?

A: Normally we would not expect the communication of false UFIs in the supply chain.

Q: Hello. If two mixtures have identical composition except for one substance that is not classified and does not exceed 1 %, can the two mixtures have the same UFI?

-Panellist 5

A: Yes, you can use the same UFI.-

Q: After submission do we have to wait for a feedback or can we ship directly after submission?

-Panellist 6

A: It is at the discretion of individual Member States to decide this criteria.-

Q: After the deadline, if the UFI number change, do we have a period to change packaging to put the new UFI number? Because we have stock of packaging.

A: You can already generate the UFI for your products now and start adding it to your product labels before the applicable deadline. If the formulation for your mixture changes after your submission and you need to generate a new UFI, this will need to be added to the new products carrying the new formulation and the new UFI needs to be communicated to the poison centres.

Q: If we sell bulk-chemicals to consumers (petrol and diesel), how do we do with the UFI? We don't give SDS to consumers and we don't have a container to put the UFI on

-Panellist 2

A: The Commission is running a workability study that covers this issue.

Q: How about the submission to the poison centres, can that be done on behalf our customers?

-Panellist 5

A: In principle, that could be possible but technicalities are still under discussion.-

Q: Hi, I would like to find out whom exactly this requirement of UFI labelling concerns. I mean, we are candle producers and we sell candles to customers. So, is it connected to allergens as well or is it totally different subject?

-Panellist 2

A: If the mixture (the candle) is classified as hazardous to health or for physical hazards, then in principle the information (including UFI) needs to be submitted for emergency use- -

Q: The deadline for supplied mixture is 2024, but produced mixture from this one is 2021. What to do in such case? Use only one UFI up to 2024?

-Panellist 5

A: Until you get the UFI, you can provide the SDS.-

Q: Different intended uses of a mixture require distinct UFIs. Correct? One chart appeared misleading to me.

-Panellist 5

A: No, the UFI is linked to the mixture composition, not the use.-

Q: Is it a mandate to have the UFI displayed in Section 2 of SDS? Label elements are defined as pictogram, signal word, hazard and precautionary statements only.

-Panellist 10

A: If a product has a label, UFI has to be in section 2.2 of SDS. If a product doesn't have a label, then UFI has to be in section 15.-

-Panellist 2

A: Section 2.2 also refers to supplementary label elements. Please see the relevant point in Annex II to REACH.-

Q: Please provide full answer; what information needs to be provided as part of the notification to the poison center if the MIM from our supplier is not hazardous and they do not provide a UFI?

-Panellist 5

A: It is possible that the supplier can make a voluntary submission and provide the UFI, but indeed it is not enforceable. Normally it is expected that you know some information about the product/mixture you buy (for example CAS number).

Q: I searched the draft guidance but there is not much information about Only Representatives legal obligations if acting on behalf of a non EU formulator

-Panellist 2

A: As said, CLP does not have the OR concept. The OR can act as an EU-based representative of the non-EU supplier, but the obligation (responsibility) to submit the information lies with the real importers.-

Q: Please provide more details on UFI printed or affixed on the label. Are laser /ink printed on the label accepted?

-Panellist 6

A: The rules of UFI on the label require it to be clearly visible, legible, and indelibly marked i.e. it can't wash off. Inks need to meet this expectation.-

Q: I want to ask about limits concentration. For example: We have 30% dangerous substance and we can use 5%. So it is 5% for concentration (28,5%-31,5% it's real 3 units we can use to term our concentration)or we have 5% limits and define(25-35%)Metanol example

-Panellist 5

A: Among the mixtures which fall under the scope of the CLP Regulation, those classified for environmental hazards *only* are outside the scope of Article 45 and information according to Annex VIII does not need to be submitted. Also mixtures which are subject to supplemental labelling requirements according to Part 1 and 2 of Annex II to CLP but are not themselves classified for health or physical hazards are not subject to submission requirements.

Q: The supplier of a MiM is not legally obliged to provide all components of his products. Assuming he has no UFI assigned to his MiM, there is no way to get the information of all components. What do I have to do then?

-Panellist 6

A: If he is not legally obliged it is possible to obtain some information from the SDS if it is hazardous mixture. Additional effort in the communication in the supply chain plays important role. It may lead you to re-evaluate your supplier.-

Q: In the first presentation it was mentioned that we have to put the UFI in the SDS section 2. It is our understanding that we only have to put UFI in SDS for industrial mixtures when not on the label.

-Panellist 2

A: If the UFI is on the label, it goes to section 2.2. If the mixture is for industrial use and the UFI is not placed on the label, it should go to Section 15.-

Q: So we do not have to put UFI in SDS of retail product?

-Panellist 5

A: It is not clear what you mean with retail product. For consumers product, SDS is not required, while for professional, it is.-

Q: Hello, is it possible to find out the VAT number of notifying company from the UFI number I read on the label?

-Panellist 6

A: It is possible after a series of transformations.-

Q: Hello, do companies have a delay from the moment they change their formulation (for example, if the classification becomes less severe) until the updates of the UFI on the label?

A: The update to the submission and the new UFI should be made before placing the newly formulated mixture on the market.

Q: The first registration is for products for consumer uses. If the product is composed by mixtures, but if the manufacturer of the mixture do not provide UFI, since registration for product for industrial uses is for 2024. How can I register my product?

-Panellist 5

A: Try to get the information. Otherwise, use the SDS.-

Q: Can distributors generate their own UFI's and send them to the supplier so they can submit this information in the application?

-Panellist 3

A: Yes, it is possible when the supplier does the notification.-

Q: If the reagent kit contains Reagent A and B and only Reagent A is hazardous, where the UFI number should be? Only in the label of the reagent kit box or/and also in the label of the hazardous Reagent A?

-Panellist 6

A: In this case the UFI would certainly go on the label of the reagent A. As for the box the general rules for labelling apply. This refers to different packaging layers and will be clarified in the updated C&L guidance available at the end of the year. -

Q: I want to ask about limits concentration. For example: We have 30% dangerous substance and we can use 5%. So it is 5% for concentration (28,5%-31,5% it's real 3 units we can use to term our concentration)or we have 5% limits and define(25-35%)Metanol exemple

A: 30% methanol solution is defined as a mixture, not a substance so you need to declare all the components of that mixture separately including the 70% of the rest.

Q: If product has a label, UFI has to be in section 2.2 of SDS. Does this mean new UFI equals a new SDS?

-Panellist 10

A: If information of SDS changes, a new SDS is required. If product has a new UFI, it is needed a new SDS with the right UFI because this number identify the composition of the mixture in the poison centre database.-

Q: I mean: who is in the scope of this UFI requirement? Are we as candle producers?
-Panellist 5

A: If the candle fulfils the definition of mixture, and you fulfil the definition of formulator, you have to provide the information.-

Q: If I start now with UFI creation for our products will there be a problem if my suppliers come later on with their UFIs for ingredients of my mixture?

-Panellist 6

A: You can create a UFI at any time, but you won't be able to include it in a submission if your mixture requires your supplier's UFI as the Poison Centre will not be able to make the correct link.-

Q: what's happened if the supplier of the MIM doesn't have a UFI indicated on the label in due time because he doesn't know that the product is sold to general public?

A: You need to communicate this information to the supplier.

Q: Could we use information from sds from supplier for MIM if we don't have the UFI number or the entirely composition?

-Panellist 5

A: yes you can, as long as you do not have the UFI.-

Q: Are the UFIs linked to the language on the label? eg. a formulation, placed in the Nordic countries & UK. The product in the Nordics has a label with 4 Nordic languages whereas the product in the UK, English. Can these labels have the same UFI?

-Panellist 2

A: They can have the same UFI.-

Q: If a composition has a single UFI but is sold by several companies in Europe under different trade names, should the Poison control Centre be updated for each brand name?

-Panellist 6

A: The Poison Center needs to be informed of the products on their market. According to the current interpretation. If your customers are not downstream users then you remain the duty holder for this obligation.-

Q: Will be article 17 of CL modified with the UFI code ?

-Panellist 2 - 12:46

A: The Annex VIII provisions should be enough, legally speaking. The UFI is an obligatory supplemental element and thus already covered in Article 17.-

Q: Hi, is there any indication of costs for submission please?

-Panellist 3

A: ECHA will not charge anything, some member states do. However, this could change in future. -

Q: Hi There, for importing products from outside the EU, is there an ability for the supplier to notify or must the Importer obtain a full composition disclosure and notify. Is there an OR type system available?

-Panellist 5

A: There is not OR and the responsibility is on the importer. Please, consider the DRAFT guidance, chapter 3.-

Q: Do UFIs need to be included in section 2 of consumer mixtures?

-Panellist 2 - 12:48

A: No SDS is required for consumer products-

Q: How long is the Q&A section still open?

-Panellist 1

A: We will answer the questions until 13:00.-

Q: What to do if you have MiMs, but your supplier didn't submit the UFI of the MiM and the deadline is approaching?

-Panellist 5

A: Try to get the information. Otherwise, use the SDS.-

Q: Are the UFIs linked to the language on the label? eg. a formulation, placed in the Nordic countries & UK. The product in the Nordics has a label with 4 Nordic languages whereas the product in the UK, English. Can these labels have the same UFI?

-Panellist 10

A: UFIs are not linked to the language of the label. Labels of several countries can have the same UFI if the mixture is the same.-

Q: Hi, will the presentation be available/downloadable ? or will the webinar be available on replay ?

-Panellist 1

A: The presentations and a video recording will be published in the webinar section of our website shortly after the event. All participants will receive a link to their email.-

Q: Hi! Must we create an UFI if our mixtures are labelled EUH208 "" Contains ,name of the sensitizing substance'. May cause an allergic reaction"?

-Panellist 2

A: no-

Q: If I have several UFI's for one mixture, do I need to write the several UFI's in the SDS or in this case the UFI is linked to the commercial name ?

-Panellist 2

A: You do not have to, but you can.-

Q: Hello, have you missed our questions?

-Panellist 1

A: Hello, we try to answer all questions as soon as possible. -

Q: Ok, but wasn't the starting time 11 a.m (Germany)?

-Panellist 1

A: Starting time was 11:00 (Helsinki time).-

Q: if UFI needs to be entered in the SDS either at point 2.2 (if product has a label) or at point 15 (if product has no label), then will Annex II of REACH regulation be updated correspondingly?

-Panellist 2

A: Possibly, but this will be decided by the Commission.-

Q: Will it be possible to use alternative raw materials which differ in the composition of the non-hazardous ingredients and still use the same UFI for the mixture?

-Panellist 5

A: The general rule applies: changed in the mixture will reflect in a change of UFI.-

Q: For already notified products the deadline is 2025 (if not modified) but what about UFI on the labels? Does the deadline remains 2020?

-Panellist 6

A: The deadline for the UFI on the label follows 2025.-

Q: When does it make sense generating an UFI for a product?

A: A: This was answered in the webinar.

Q: And how can I do this?

A: This was answered in presentation 2.

Q: if we declare to the poison control center preparations for another company, which VAT number should be used to create the UFI?

-Panellist 10

A: You can use the VAT number you consider more appropriate. Is it possible to create UFIs without VAT number in the UFI Generator. It is not mandatory to use it.-

Q: If I only repackage and rename the product from my suppliers I can use the same UFI, but shouldn't the poison centers be aware that the same UFI corresponds to two different tradenames? thanks!

-Panellist 10

A: Yes, it is necessary to modify the submission of your supplier to include your new trade name and the new information associated to this trade name (packaging, etc.).-

-Panellist 5

A: Repackaging is considered a downstream use so you have to notify. Relabelling is not but we recommend that the new name is submitted.-

Q: Must the UFI code be on the label?

-Panellist 5

A: the UFI must always be on the label.-

Q: For industrial mixtures, UFI must appear in which section of SDS ?

-Pannellist 2

A: 15-

Q: Does the UFI need to appear in the supplemental label elements field of the sds or can it appear anywhere in section 2.2 with its own heading e.g UFI?

-Panellist 2

A: This is not specified in the legal text, but we can take the issue under consideration in the preparation of the guidance.-

Q: We sell mixture to industrials. The final product is for consumer. I understand that we have until 2020 and not 2024 to perform the submission. Am I correct? Additionally do we have to add the UFI on the label of this mixture or only in the SDS?

-Panellist 2

A: Yes, if the final use is consumer use, the mixture must be notified already for the first deadline. As long as the mixture is supplied for the industrial user, though, the indication of the UFI in only the SDS is possible.-

Q: If the original submission is made under UFI#1 using suppliers SDS as no info was available, is a new UFI required when this information is available?

-Panellist 5

A: This topic is under discussion.-

Q: Hello, I sell products to industrial laundries to treat textiles garments. Can I classify them as for industrial uses and consider the deadline of 2024?

A: It seems so if the product is ONLY used in an industrial setting. Please check the definitions of industrial use.

Q: When will the guidance be available for the derogation and consideration of small packages and multi-layered packaging?

-Panellist 8

A: Hello, the CLP Guidance on Labelling and Packaging will soon undergo consultation and it will be finalized at the end of the year.-

Q: Is the transition period valid until 2025 even if there is no UFI on the label?

-Panellist 2

A: Yes, if the mixture has been notified under the current national systems.-

Q: Will it be possible to report a formulation to all EU poison centers at a time?

-Panellist 5

A: In principle, that could be possible but technicalities are still under discussion.-

Q: As we are a UK entity and the future use of our VAT number is questionable under Brexit; can we apply as if we have no VAT no.; or is use of a VAT number mandatory if we have one?

-Panellist 2

A: It is not yet clear what the situation will be resulting from Brexit.

Q: If we use a non hazardous MiM from a supplier in a hazardous Mixture. Is the Supplier legally obligated to generate an UFI for the non hazardous Mixture? Or is the SDS sufficient in this case?

-Panelist 10

A: The supplier of non hazardous mixture is not obliged to have a UFI, but then they need to tell the full composition. SDS is not mandatory for non hazardous mixtures.-

Q: Is there any indication of timeline for confirmation of costs of submission to each member state. Will each member state adopt regulation?

-Panellist 6

A: This is out of the scope of today's Q&A. The regulation will be operational from 1 January 2020 for all Member States.-

Q: Hi MiM is it like perfume in cleaning products?

A: a MiM is a mixture used to formulate another mixture.

Q: I sell my products in many EU counties. When I submit the information on the UFI, do all the European poison centers receive them? and after the submission, can I put the emergency telephone numbers of all the poison centers in the SDS?

-Panellist 5

A: The information will only be available to those Member states where you have made the submission. Regarding your question on telephone numbers, please consult the Guidance on SDS.

Q: You are saying that if we don't know the composition or the UFI of a MiM from our supplier "use the SDS". Could you please develop ?

A: This is out of scope of the webinar.

Q: If the guidance is not available till end of 2018 how is business going to manage consumer submissions for start of 2019 with fully adapted systems?

-Panellist 5

A: The consultation can be followed online and the draft is available online. After the PEG consultation, the version is usually very close to the final version.-

Q: Hi, is it possible to know if a product has been notified to a poison center with the UFI?

-Panellist 5

A: Not really. -

Q: We've always thought section 1 is the most appropriate place in an SDS for the UFI (eg alongside the emergency telephone number) - are your earlier references to section 15 based on regulation or your concept of best practice?

-Panellist 2

A: This can be further considered, but 2.2 is logical as UFI is a label element. Section 15 includes any regulatory reference, so that is also logical. Section 1 can only be used if it is decided that the UFI is a product identifier.-

Q: The supplier of non hazardous mixture is not obliged to have a UFI, but then they need to tell the full composition. SDS is not mandatory for non hazardous mixtures. But if he provides me with a SDS?

-Panellist 10

A: SDS and UFI are not mandatory for non hazardous mixtures, but both are possible to have it in a voluntary way. Anyway, SDS is not enough. Supplier has to provide the full composition according to Annex VIII or the UFI of this mixture.-

Q: Hi, will enforcement authorities be able to request whether for an UFI on a label, the respective notification has been made?

-Panellist 2

A: Yes-

Q: It is my understanding that different companies can share a VAT number - is there a danger that 2 separate companies might generate the same UFI?

-Panellist 5

A: Usually companies should have different VAT. If companies belong to the same group, they must be careful to adopt measures to avoid the generation of the same UFI.-

Q: A product that is not classified but provided with EUH208 phrase, would it need to be notified and would it need a UFI?

-Panellist 6

A: Mixtures which are subject to supplemental labelling but not classified are excluded.-

Q: Hallo, I sell products to industrial laundries. Is my deadline 2024? Must I print the UFI on the label or to report it in the SDS is enough?

-Panellist 5

A: If you think that is an industrial use ONLY, then the deadline is 2024. By default the UFI must always go on the label unless for industrial use only. -

Q: If we have already notified Poison Centre in one country but we sell same product on other EU countries, do we have this deadline 2025? Or should we notify in all countries where product is sold? 2025 is it deadline for notification or for UFI placing on label

-Panellist 5

A: 1. No. you need to notify to all the countries. 2. 2025 is the deadline for both.-

Q: good morning, we are manufacturers and our mixture are not classified as dangerous/hazard, but only as skin sensitizers (EUH 208). Do we have to create a UFI number anyway?

-Panellist 2

A: no-

Q: But the draft guidance indicates that non-EU manufacturers can appoint an EU legal entity to make the notification on their behalf, can't this legal entity be a consultant acting as an OR also?

-Panellist 6

A: There is no official OR concept in Annex VIII, note that the duty holder will always be the importer and if he uses someone to notify on behalf, then contractual agreements should be made.-

Q: To create a UFI, is there a requirement in number of characters in the formulation number or is it possible to start at 0?

-Panellist 3

A: The formulation number is numerical only and between 0 and 268 435 255 so yes, you can start with 0 -

Q: When I send the UFI to poisons centers, all the EU poison centers receive the information? then, can I write the telephone n. of the poison centers of the countries of my interest in the SDS?

A: Please consult Guidance on SDS. UFI will be available only in those countries you have made the submission.

Q: Hi, Is it possible to save the entire Q&A?

-Panellist 1

A: We do not provide the full Q&A transcript to participants due to confidentiality issues. Questions identified as general interest, will be visible in the Q&A panel during the webinar.-

Q: The format how to print the UFI on a label is described in detail in the draft guidance. I did not find any information on the format how to print the UFI on an SDS (additional header phrase?). Can you please provide more information about this?

-Panellist 5 - 12:48

A: There is not format provided.-

Q: If I use a MiM and the supplier has generated an UFI, do I have to make sure, that he has send the information to all countries I want to sell my product?

-Panellist 6

A: It is advisable to inform your supplier in which countries you intend to use the MiM.

Q: If a product is only labelled but not classified (eg. EUH208), is there a need to generate a UFI?

A: Mixtures which are subject to supplemental labelling requirements according to Part 1 and 2 of Annex II to CLP (as with EUH208) but are not themselves classified for health or physical hazards are not subject to submission requirements and do not need UFI.

Q: Has it been decided if the poison center notification would be central or per country?

-Panellist 5

A: This topic is still under discussion.-

Q: How do I have to deal with 2-component-products eg. in one cartridge or in 2 separate containers? Do I need 3 UFIs: one for components A, one for B and one for A+B?

-Panellist 6

A: No, you only need UFIs for the mixtures you place on the market and not the final mixture made by the customer.-

Q: Hello, if I sell the same product both in bulk (therefore with no label) and in packagings, where should I enter UFI in the SDS, both in section 2.2 and 15, or should I have two different SDS's for bulk versus packaging?

A: You can have it in both sections.

Q: If my product is also a medical device (disinfectant product). With the new regulation which be applied in 2020, can i use the UDI code as UFI code ?

-Panellist 8

A: Hello, medical devices are excluded-

Q: A question regarding paints : hundreds of different recipes differing by their pigments. The principle "one formula=1 UFI" would mean hundreds of UFIs. We were told about the possibility of having only 1 UFI if the pigments % lie below 25% w/w. Is it true

A: Yes, the webinar did not cover the group submission but this 25% rule applies only if the pigments are not classified.

Q: For generating multiple UFIs i need multiple formulation numbers. If I want a UFI for every Product Name of a composition I need to map an Identifier for every Name and generate a UFI. Is this Correct?

-Panellist 3

A: Yes, you could assign each product an own formulation number. If you manage a big portfolio you may want to consult the UFI developer manual https://poisoncentres.echa.europa.eu/documents/22284544/22295820/ufi_developers_manual_en.pdf/9d47a5c9-ba58-4b5c-81-

Q: Another thing: does that mean that on labels of ex. cleaning agents there won't be any information on ingredients but UFI only?

-Panellist 5

A: UFI does not replace the normal information for labelling. UFI is additional.-

Q: If in my mixtures I use raw materials from different suppliers that aren't classified as hazardous or for which I don't know all the formulation, how can I do?

-Panellist 5

A: Then you can use the SDS.-

Q: Who is legally responsible to notify to poison centres? Can we (PL producer) submit on behalf of our customers? Can same UFI code be used by different companies?

A: This is out of the scope of this webinar.

Q: Another question regarding the 100% myth for a formulator point of view : if (as) the suppliers don't give us their UFI for their MiM, you said that we could send only the SDS. In practice, only 30-40% of the substances are known in an SDS. What to do ?

-Panellist 5

A: You may ask the supplier to submit voluntarily the information and provide you with the UFI. Eventually, consider changing the supplier. The last option is using only the information you have: you provide the SDS and the contact details of the supplier.-

Q: what information needs to be provided as part of the notification to the poison center for a inclusion of a non-hazardous MIM in our product when the supplier does not provide full composition, a UFI and the SDS?

-Panellist 6

A: If your supplier is not legally obliged to submit information, then you may obtain a UFI from him if he makes a voluntary submission - If you cannot receive the information one way or another, it may lead you to re-evaluate your supplier.-

Q: Hello, do UFI have to be on the label near CLP text or can to be placed on the packaging on any place on this packaging, the same as the expiration date? Sometimes it is a problem with placing UFI near CLP text.

A: You only need to put the UFI on the label, not on the packaging.

Q: A lot of topics are still under discussion. How should industry prepare the notification processes till end of 2019?

A: ECHA and member states are preparing relevant support such as Guidance and IT tools.

Q: How do we deal with variable composition products such as reacted formulations where various factors may change composition and %?

-Panellist 8

A: Hello, if you change the formulation of your mixture beyond the allowed variation ranges, you will need to generate a new UFI and notify it. When there are frequent changes to UFIs, you can affixe the label on the product. -

Q: In the case of water soluble metalworking fluids, how would one distinguish between the concentrate and the emulsion? If the Poison Center were to receive a call would the operator be treating according to the UFI or would they ask for the concentration?

-Panellist 5

A: This topic is out of the scope of this webinar. However, in the free text field, provide the information you have about the end use.-

Q: Is the use of UFI mandatory for biocidal products ?

-Panelist 10

A: Yes, It is mandatory if they are hazardous for human health or physical hazards-

Q: draft guidance indicates: If the non-EU supplier (the non-EU exporter to the EU) has a legal entity based in the EU (or a contractual agreement with an EU-based legal entity), then a submission through this legal entity can be made to the Member States

A: This is out of the scope of this webinar and the Guidance is in the draft stage.

Q: Do we have place UFI on the outer pack?

-Panellist 5

A: please, follow the labelling rules. Discussion is ongoing.-

Q: What if a Biocide product is only hazardous for environment? No UFI required?
-Panelist 10

A: Is not mandatory to have a UFI if biocide is only hazardous for environment.
Is it possible to have it under a voluntary basis.-

Q: So is the UFI generally only mandatory if a product is classified as hazardous?
-Panellist 5

A: The UFI must be printed on or affixed to the label of
all your products containing hazardous mixtures. In
cases where products are not labelled – such as with
certain products used on industrial sites – the UFI
can be indicated in the safety data sheet-

Q: Do we have place UFI on the outer pack? copy answer only on label

A: The general rules for labelling apply. This refers to different packaging layers – you
can consult the C&L Guidance which will be updated at the end of the year.

Q: How do you have to handle mixtures containing MiMs and during mixing reactions are
occurring as e.g. acid-base reactions? As a result you get an ionic mixture, but you may
not know the exact composition.

A: This is out of the scope of this webinar. Rules on identifying the substances will be
included in the guidance.

Q: Hi! Must we create an UFI if our mixtures are labelled EUH208 "" Contains ,name of
the sensitizing substance'. May cause an allergic reaction"?

A: Mixtures which are subject to supplemental labelling requirements according to Part 1
and 2 of Annex II to CLP (as with EUH208) but are not themselves classified for health
or physical hazards are not subject to submission requirements and do not need UFI.

Q: and if this product is a medical device and a biocidal product ? UDI and UFI codes
must be indicated on the label. Should they be separated or only on code will be
accepted. ex : UFI/UDI : xxx ?

-Panelist 10

A: Both codes are different. They need to be on the label according their
respective regulations.-

Q: So that means, if i submit a mixture i may have to wait for an "Ok" depending on the
member states decision. Right?

A: The submission process will start only during 2019 but all legal decisions on the PCN
portal will be done before that in 2018.

Q: If the issue in my example is possible then it should be publicised that companies should not use the VAT number to generate the UFI if confidentiality on company ID is a concern.

A: In general, VAT number is not a confidential information of the company, it can be found on webpages and so on. Also name of the company appears on the label. It is not clear to us what confidentiality issues would arise from using UFI. Our advice is based on available option, but is not a confirmation of sharing your concerns.

Q: I feel it is a step backwards to not have a UFI for environmentally hazardous mixtures, the original intention of ECHA and the whole REACH process was to protect the environment. Perhaps you are considering something separate for spillage / clean ups?

A: Poison centres are tasked with providing emergency health response to humans.

Q: If we buy one MiM (hazardous mixture) to several suppliers with different classifications, can we use the same UFI (the most dangerous of them), as we do for our CLP classification?

A: This topic is under discussion in the guidance.

Q: Who is legally responsible to notify to poison centres? Can we (PL producer) submit on behalf of our customers?

-Panellist 5

A: It is possible to prepare and generate UFI but IT does not support that yet.-

Q: what information needs to be provided as part of the notification to the poison center for a inclusion of a non-hazardous MIM in our product when the supplier does not provide full composition, there's no UFI and there's no SDS?

-Panellist 6

A: If your supplier is not legally obliged to submit information, then you may obtain a UFI from him if he makes a voluntary submission - If you cannot receive the information one way or another, it may lead you to re-evaluate your supplier.-

Q: Can same UFI code be used by different companies?

-Panelist 10

A: Yes, if this UFI is associated to the same composition of a mixture.-

Q: If we realise product for our customers (at customer's brand), must we used the VAT number of our customer or ours?

A: You can use either. Please note that if the formulation of the customer brand mixture differs from the mixture of your own product, different UFIs will be required.

Q: A fragrance, as considered MIM for industrial use, is supplier legally obliged to generate UFI?

-Panellist 5

A: yes, as long as it falls under the scope of art. 45.-

Q: if I understand, if the formula change, we have to change the formula code, that's right?

-Panellist 8

A: Hello, as explained in presentation 3, under certain conditions, changes to the mixture composition require the change of UFI. -

Q: hallo, to create a UFI that is linked the poison centers, must I wait for my suppliers to provide me their own UFI?

-Panellist 3

A: It depends on your agreement with your supplier, you may generate the UFI code on your own or you get it from your supplier. -

Q: You are contradicting yourself on these 2 answers. pls clarify:

A: Not sure what you mean exactly. Please contact ECHA Helpdesk

Q: SDS and UFI are not mandatory for non-hazardous mixtures, but both are possible to have it in a voluntary way. Anyway, SDS is not enough. Supplier has to provide the full composition according to Annex VIII or the UFI of this mixture.

-Panellist 5

A: The supplier has the obligation under Annex VIII.-

Q: The same product made in two different production plants with same C&L but different formulation in the part of not dangerous components should have different UFIs: is it correct? If yes, is it allowed?

A: Yes, the UFI is based on the formulation of the mixture. Therefore, if it differs, different UFIs must be assigned and the corresponding UFI placed on the label.

Q: from the examples given: can you talk us through the following scenario; what if a MIM is not hazardous and not a UFI is provided by the supplier? What information to provide as part of the notification?

-Panellist 5

A: You should try to get the UFI. Eventually, consider changing supplier. You can also provide the SDS if UFI is not available.-

Q: A: It is possible that the supplier can make a voluntarily submission and provide the UFI, but indeed it is not enforceable.

Q: if, for my mixture, I changed a raw material for which I don't have information on 100% of the components, but the final concentrations of the single hazardous substances in the final mixture don't change, the UFI must be regenerated?

A: Maybe best would be to get UFI from the supplier - if the UFI remains the same, then no need to change anything on your side. Your supplier may make slight changes without having to change UFI (see Table 3 of Annex VIII).

Q: If a poison centre wish to use only a part of the UFI to identify the product and not have the inquirer read all 16 characters, can you say if it would be better to ask for the first or last characters?

A: Usage of UFIs by poison centres is not subject to this webinar. Rest assured that poison centres medical personnel will know how the UFI works and how to ask for it.

Q: Can a Only Representative apply for the UFI? Or is it only possible for the EU-importer?

-Panellist 6

A: There is not OR in CLP The obligation to submit remains on the importer or downstream user. -

Q: Art. 17 CLP does not require an email to identify the supplier but it is required by Annex VIII. Does that mean email becomes a required CLP label element?

-Panellist 1

A: We have closed the Q&A session. If you have not received your answer, you can submit your question to ECHA by using our contact forms at:
<http://echa.europa.eu/contact/>-

Q: Can an Only Representative apply for the UFI and notify to the national poison center?

A: There is no concept of OR in the CLP legislation. Duty holders are the importers or downstream users of the mixture.

Q: If I have say 10000 notifications to perform, how long would you envisage this to take to submit

A: This is out of the scope of the webinar. This will depend on the method of generator of notification you will choose, automatic or manual.

A: Yes, if the paints are not classified. If they are, each mixture must have its own UFI.

Q: My second Question was: IS possible to provide MSDS for MIM in english version only for all EU countries in which I want to place my mixture containing MIM without UFI on the market?

-Panellist 8 - 13:23

A: Hello, the SDS must be submitted in the official languages of the country you intend to market your product in.-

Q: Still a bit confused on this point: if a MiM is NOT hazardous and no UFI is available, I can submit the MSDS and the supplier details in place of the UFI / full details on the composition of the MiM?

A: You still need to generate the UFI for your final mixture. If your supplier will not provide you with a UFI then they need to provide the SDS. Note that UFI is part of SDS.

Q: Thank you, but then we have problem: We are DU (contract filler) = suppliers of raw material for our country are not obliged to provide me MSDS in other languages than language used in my country and not in language used in country of my customer.

A: Indeed we acknowledge the problem but the SDS must be submitted in the official languages of the country you intend to market your product in. It is possible to obtain some information from the SDS and use this information in the notification. Additional effort in the communication in the supply chain plays important role.

Q: I have no possibility to force suppliers of MIM to provide me MSDS in various languages which I need for placing on the market in various EU countries - it is not mandatory for them if they do not place MIMs on market in EU country of my customer

A: It is possible that the supplier can make a voluntary submission and provide the UFI, but indeed it is not enforceable. Normally it is expected that you know some information about the product/mixture you buy (for example CAS number).

Q: but the EUH208 indication is obligatory in label and is mentioned in SDS in section 2.2. Confirm you that the UFI is not necessary?

A: Mixtures which are subject to supplemental labelling requirements according to Part 1 and 2 of Annex II to CLP (as with EUH208) but are not themselves classified for health or physical hazards are not subject to submission requirements and do not need UFI.