

# Welcome

## Webinar: Poison centre notifications: ensuring compliance for industrial use mixtures

14 November 2023

Heidi Rasikari  
Regulatory Officer  
European Chemicals Agency



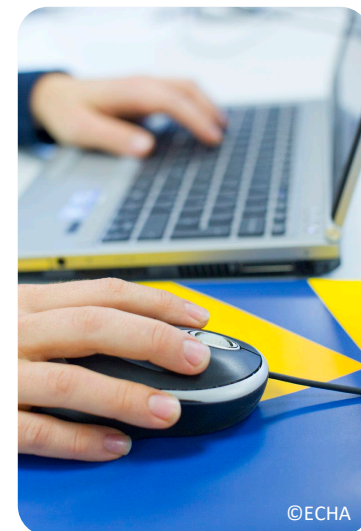
# Programme



Time	Topic	Speaker
11:00	Introduction	Heidi Rasikari, ECHA
11:05	Industrial use only mixtures – what you need to know	Heidi Rasikari, ECHA
11:20	Status update on the CLP revision	Daniele Ape, ECHA
11:30	Support and guidance	Pedro Roselló Vilarroig, ECHA
11:40	Closing remarks	Pedro Roselló Vilarroig, ECHA
11:45-13:00	Webinar open for questions	All

# Live Q&A

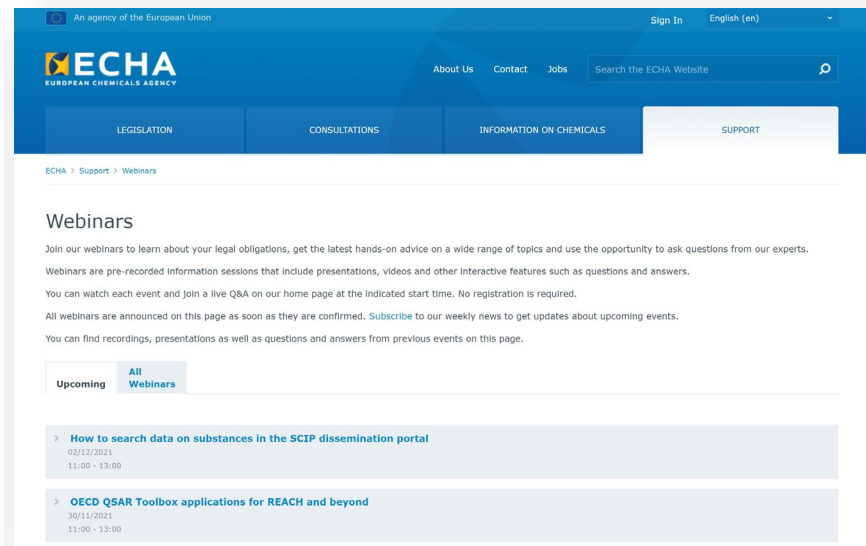
- Join Q&A at: slido.com  
Event code:
- Send questions from  
11:00 to 13:00 (EET, GMT +2)
- Only questions within scope
- Question not answered?  
Contact us: [echa.europa.eu/contact](https://echa.europa.eu/contact)



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# Material available

- Video recording
- Presentations
- Q&A (soon after the event)  
[echa.europa.eu/webinars](https://echa.europa.eu/webinars)



The screenshot shows the ECHA website's 'Webinars' page. The header includes the ECHA logo, navigation links for 'About Us', 'Contact', and 'Jobs', and a search bar. A blue navigation bar contains links for 'LEGISLATION', 'CONSULTATIONS', 'INFORMATION ON CHEMICALS', and 'SUPPORT'. The main content area features a breadcrumb trail 'ECHA > Support > Webinars' and a section titled 'Webinars'. Below the title, there is introductory text explaining the purpose of webinars and how to access them. A filter bar shows 'Upcoming' and 'All Webinars' tabs. Two webinar entries are listed:

Topic	Date	Time
> <a href="#">How to search data on substances in the SCIP dissemination portal</a>	02/12/2021	11:00 - 13:00
> <a href="#">OECD QSAR Toolbox applications for REACH and beyond</a>	30/11/2021	11:00 - 13:00

# What you need to know about industrial use only mixtures

Webinar: Poison centre notifications:  
ensuring compliance for industrial  
use mixtures

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# Introduction

- 1 January 2021 compliance date for consumer and professional use mixtures passed
- Upcoming compliance date for industrial use: **1 January 2024**
- Transition period ends 1 January 2025
- Over 5.3 million notifications for all use types so far



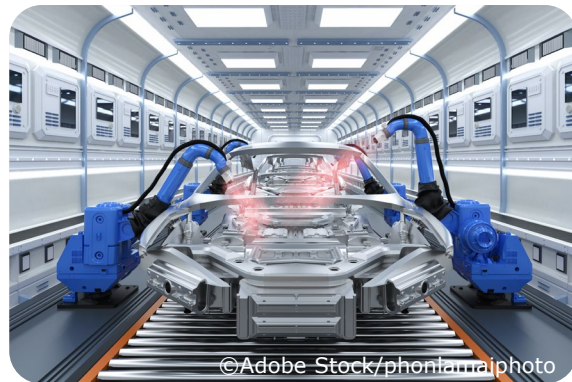
# Second compliance date

- **Second compliance date:** 1 January 2024
- **Scope:** Industrial use only mixtures
- **Requirement:** Notify mixtures hazardous to health or physical effects
- **Starting January 2024:** Notify all new mixtures (consumer, professional, and industrial) in harmonised format



# What is an industrial use only mixture?

- Must be used at industrial sites only.  
Can be supplied as:
  - Industrial end-use product
  - Mixture-in-mixture ('MiM') re-formulated into other industrial use only products
- **Not the same** as mixture for 'industrial use'
- Based on 'end-use': must not be available to consumer or professional users (as-supplied or reformulated)





# Transition period

- **Existing 'national' notifications:** Valid until 1 January 2025
- **Starting 1 January 2025:** Any 'national' notifications require submission in harmonised format
- **Product changes:** Before this time, changes may trigger a harmonised notification and unique formula identifier (UFI) on label (e.g., new toxicity data, classification, trade names)
- **Discontinued products:** No new submission required if product discontinued before transition period ends



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# Relabelling 'old' products after 2025

- **Duty holder responsibilities**  
(1 January 2025):
  - Create UFI and ensure correct product labelling when placing on the market.
  - Consider relabelling products in warehouses (e.g., using stickers)
- **Distributor guidelines**  
(1 January 2025):
  - No need to relabel products on shelves with UFI if they were CLP compliant when supplied



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# Importance of the unique formula identifier (UFI)

- **Main principle:** one UFI for one mixture composition
- **Flexibility:** one mixture composition can have multiple UFIs
- **UFI:**
  - Used by poison centres to identify a unique mixture composition
  - Used and re-used by industry to protect confidential information
- Correct management from generation to use in supply chain vital to assist poison centres



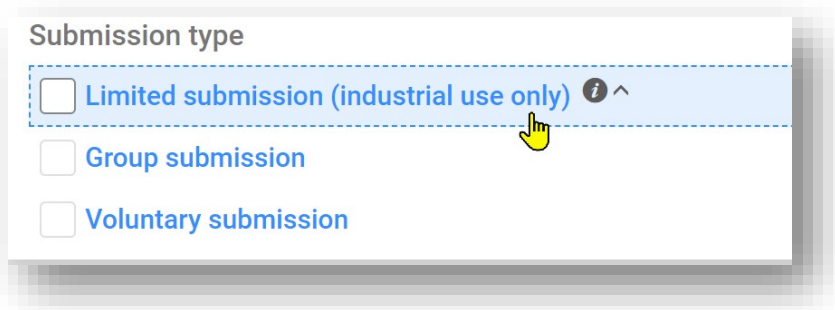
# Notifications for industry use only

The screenshot displays the IUCLID interface. On the left, there are three navigation cards: 'Substances' with 84 items, 'Mixtures' with 148 items, and 'Articles' with 53 items. Each card features a representative icon (a flask, a test tube, and a bolt respectively) and a right-pointing arrow. The main area is titled 'Import IUCLID file(s)' with a help icon and an 'Overwrite settings' dropdown menu set to 'If newer than existing'. A prominent blue notification box contains the following text: 'On import, datasets of type Substance, Mixture, Article and Category will be converted into a dossier, to avoid conflicts with data already in the IUCLID database. An editable dataset can then be extracted from the dossier with a higher degree of control than importing as a dataset. To import directly as a dataset, [click here](#).' Below the notification is a large dashed border area for file import, containing a file icon, the text 'Drop file to import or', and a 'Browse' button.

# Notifications for industry use only

## Limited submission – use is optional

- 'Limited' compositional information from safety data sheet can be used
  - All other information must be provided
- Contact person must be available 24/7 to provide 'rapid access' to more information
  - In all relevant languages indicated in the dossier header



Submission type

Limited submission (industrial use only) *i* ^

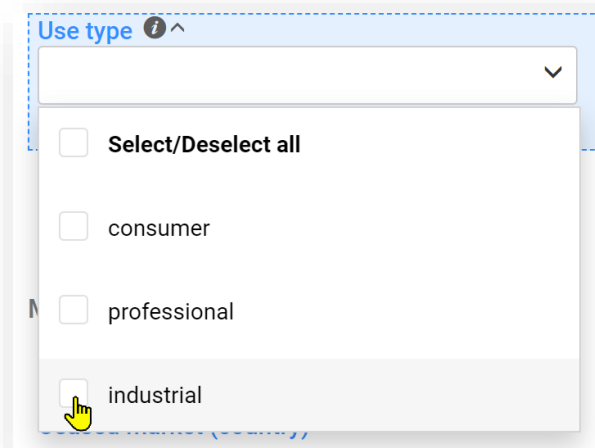
Group submission

Voluntary submission

# Notifications for industry use only

## Use type

- Select 'Industrial' use type
  - Prevents downstream users from using mixture to reformulate consumer or professional products
- Available also for industrial mixtures *'with an end use not subject to notification'*
  - Final mixture not classified or classified for environmental hazards only
  - Falls outside CLP scope e.g. cosmetic product



Use type ⓘ ^

Select/Deselect all

consumer

professional

industrial

# Notifications for industry use only

## Packaging

- Not strictly necessary to provide 'packaging' information
- Applies also to industrial mixtures

Packaging ⓘ ^

Product not packaged

[Link to the packaging information](#)

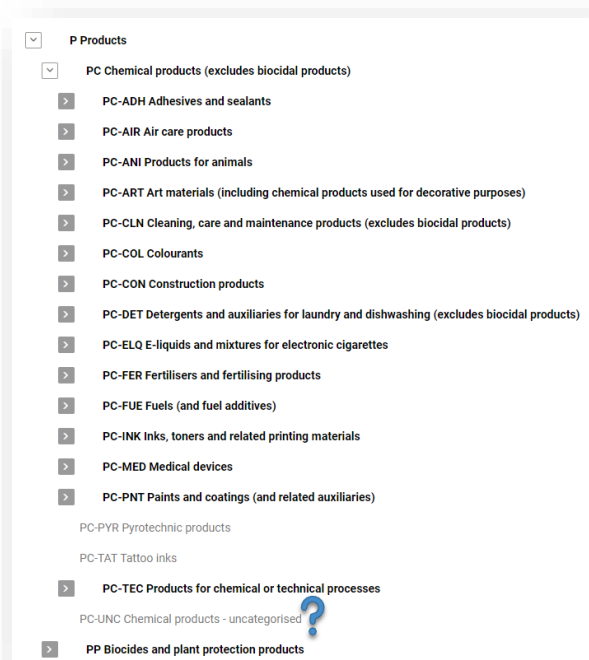
# Notifications for industry use only

## Product category

- One 'main intended use' per product record
- Select category with care - if unsure, reach out to industry association or request an EuPCS change through: [echa.europa.eu/contact](https://echa.europa.eu/contact)

## Tips

- Top-level categories should be covered so mixtures categorised as 'uncategorised' should be rare. Let ECHA know.
- Selecting 'for further formulation' should only be for industrial end-use products





# Contact information considerations

- Contact person (24/7) for rapid access in all relevant languages for limited submissions
- Different from emergency telephone number used in section 1.4 of safety data sheet
  - Some poison centres charge fees e.g. NPIC-Ireland
- Do not use contact details of appointed bodies in notification or safety data sheet



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# Using ECHA submission portal

- Check Member State overview document – fees, national requirements, languages
- National systems currently remain open for industrial use mixtures in a handful of countries
- Check languages – some countries only accept in national language.  
[List of appointed bodies](#)
- Submitting to Northern Ireland?
  - Use UK national system – [check guidance](#)



	Duty holder must notify in one official language of the Member State (other than English)
Austria	German
Belgium	French or Dutch or German or English (if German then English also recommended).
Bulgaria	Bulgarian
Croatia	Croatian or English
Cyprus	Greek
Czech Republic	Czech
Denmark	Danish or English
Estonia	Estonian or English
Finland	Finnish and Swedish
France	French
Germany	German or English
Greece	Greek
Hungary	Hungarian
Iceland	Icelandic or English
Ireland	English
Italy	Italian or English
Latvia	Latvian or English
Liechtenstein	German
Lithuania	Lithuanian or English

# Thank you

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# Status update on the CLP revision

**Webinar: Poison centre  
notifications: ensuring compliance  
for industrial use mixtures**

14 November 2023

Daniele Ape  
Regulatory Officer  
European Chemicals Agency



# Why a CLP revision?

- Part of [European Green Deal](#) and [Chemicals Strategy for Sustainability](#)
- Serves 'one substance, one assessment'
- Adaptation to technical and scientific progress
- Push and prioritise more harmonised classifications
- Better identify and classify hazardous chemicals
- Address legal gaps and high non-compliance



# CLP revision in two parts

## 1. Ordinary Legislative Procedure

Change in CLP "body" text

Co-decision via Parliament and Council

## 2. Delegated Act

Changing Annex I Hazard classes

Commission decision via consultation with competent authorities for REACH and CLP (CARACAL)

**Published 30 March 2023**

**Entered into force 20 April 2023**



# Delegated Act (Annex I)

## Overview

New criteria for endocrine disruptors for human health and environment (ED HH & ED ENV)

- **Category 1**  
(known/presumed)
- **Category 2**  
(suspected)

Persistent, mobile and toxic (PMT), very persistent and very mobile (vPvM)

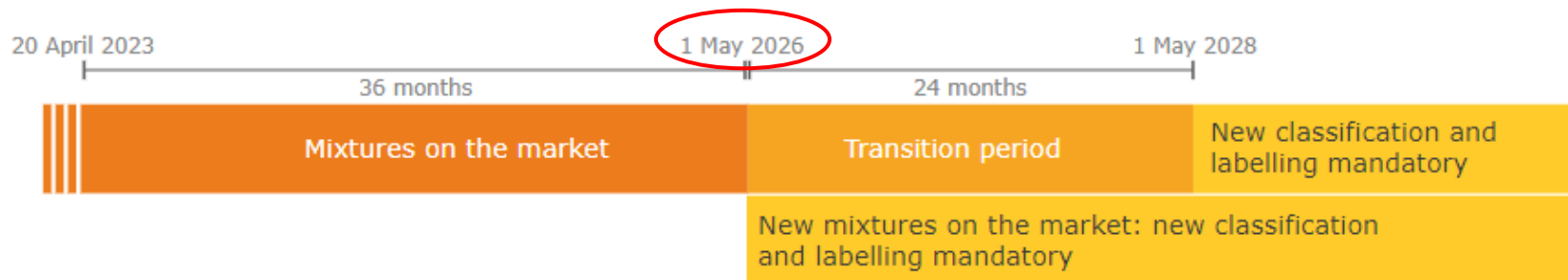
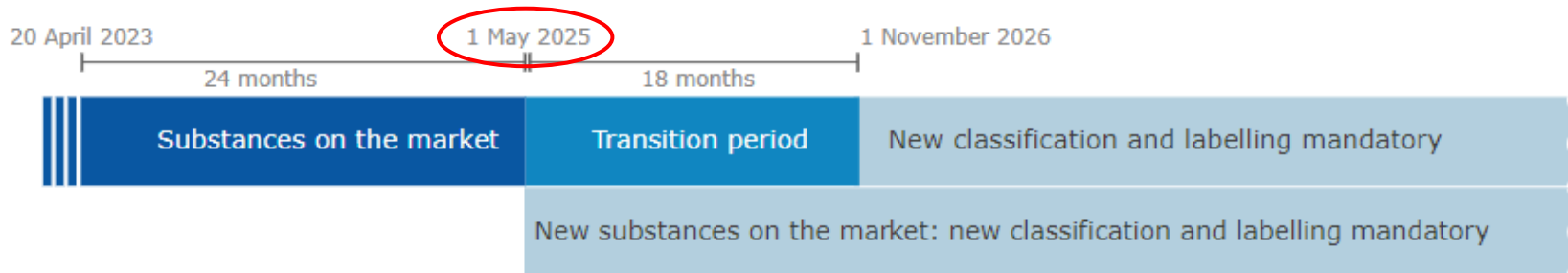
No subcategories

Persistent, Bio-accumulative and Toxic (PBT), very Persistent, very Bioaccumulative (vPvB)

No subcategories

# Delegated act

## Application dates





# Delegated act

## Impact on poison centre notification system

- Scope expansion: new mixtures to notify and existing notifications to (potentially) update
- IUCLID format revision (not only related to poison centre notifications)
- IT tools adaptation (for industry and authorities)
- Validation assistant revision
- Guidance and practical guide



# Delegated act

## Adaptation timelines

- IUCLID format revision: new hazard classe records
  - IUCLID release April 2024
  - Test version available earlier
- Validation assistant revision
  - Updated rules together with format
  - Rules list not affected (descriptions remain the same): no new rules expected



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# Ordinary legislative procedure

Considerations based on Commission draft proposal:

- Dialogue between Commission, Parliament and Council ongoing
- Expected entry into force earliest June 2024
- Focus on poison centre notifications



# Ordinary legislative procedure

## Distance sales

- Supplier in EU needed to ensure CLP requirements are met
  - Avoid obligations on consumer (e.g. direct online sales from non-EU vendor)
  - No addition of new operator (e.g. not an only representative like in REACH)
- Expected impact mainly on guidance and practical guide



# Ordinary legislative procedure

## Duty holder definition (1)

- Inclusion of distributors to cover potential information gaps in case of:
  - Distribution across borders
  - Re-labelling/rebranding

**Note:** No need for submission if information included in supplier's notification



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# Ordinary legislative procedure

## Duty holder definition (2)

Duty holder definition - to be clarified:

- When distributor's notification is expected
- How to prove information has been provided to relevant appointed bodies

Expected impact on:

- Guidance and practical guide
- Format (potential)
- Validation rules (potential)



# Ordinary legislative procedure

## ECHA role and access rights

- Further facilitate support for authorities
- More robust legal basis for ECHA's role in receiving and pre-processing notifications

**Note:** Final legal text and interpretation not available yet



# Thank you

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# Support and guidance

## Webinar: Poison centre notifications: ensuring compliance for industrial use mixtures

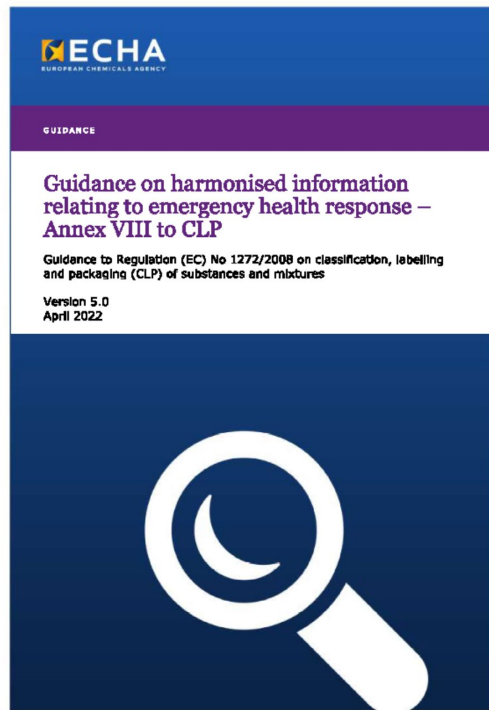
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Regulatory Officer  
European Chemicals Agency



# Guidance on Annex VIII

- First support material after legal text
- Last update in 2022
- Next revision once CLP revision adopted
- Translated into all EU official languages



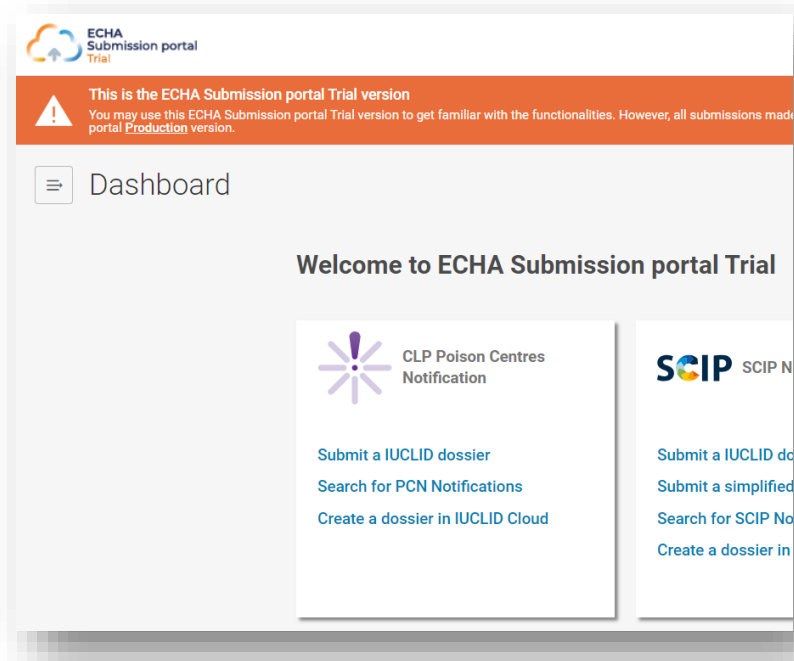
# Poison centre notifications: a practical guide

- Replies to 80% of questions received
- Next update expected before end of 2023, only in English
- Translation later in 2024 following changes from IUCLID release and changes to CLP



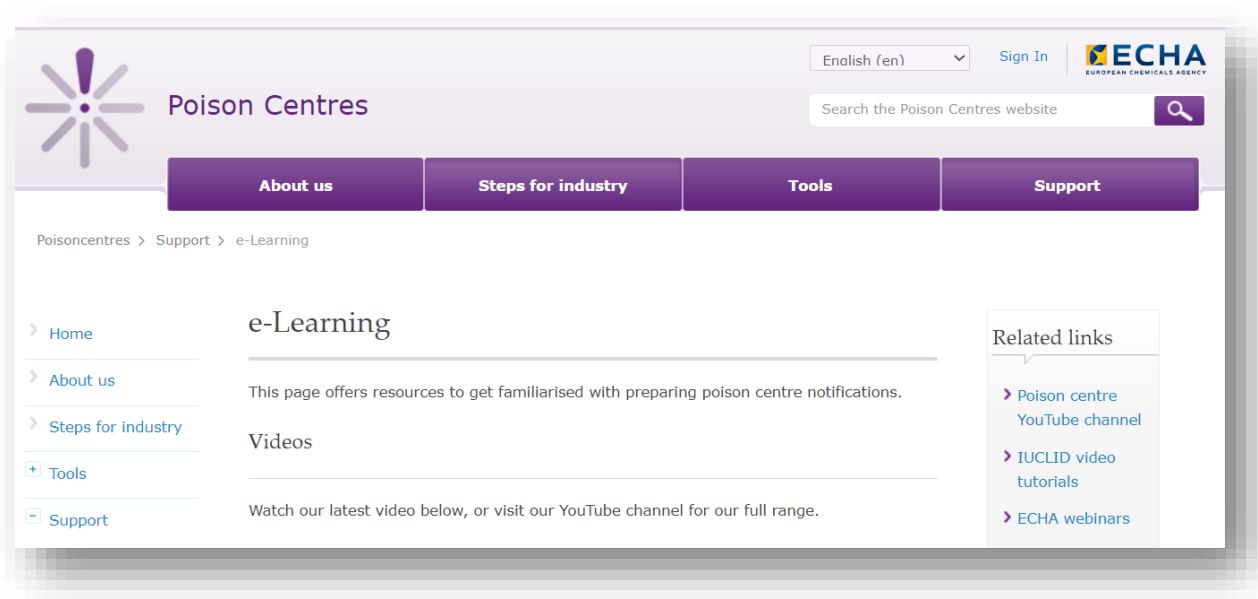
# Trial environment

- Sandbox concept
- Both for ECHA submission portal and cloud IUCLID
- IUCLID files from stand-alone can also be imported and submitted



# Video tutorial

- Video covers whole submission process
- General submission case



The screenshot displays the Poison Centres website interface. At the top left is the Poison Centres logo, a stylized purple starburst. To its right is the text "Poison Centres". In the top right corner, there is a language dropdown menu set to "English (en)", a "Sign In" link, and the ECHA logo (European Chemicals Agency). Below the logo and text is a search bar with the placeholder "Search the Poison Centres website" and a magnifying glass icon. A horizontal navigation bar contains four purple buttons: "About us", "Steps for industry", "Tools", and "Support". Below this bar, the breadcrumb trail reads "Poisoncentres > Support > e-Learning". On the left side, there is a vertical menu with links: "Home", "About us", "Steps for industry", "Tools", and "Support". The main content area is titled "e-Learning" and contains the text: "This page offers resources to get familiarised with preparing poison centre notifications." Below this, there is a section titled "Videos" with the text: "Watch our latest video below, or visit our YouTube channel for our full range." On the right side, there is a "Related links" section with three links: "Poison centre YouTube channel", "IUCLID video tutorials", and "ECHA webinars".

# Questions and answers

- Moved to new platform in spring
- New revision ongoing: expected publication before end of the year

ECHA > Support > Questions and answers

## Questions and answers

This database has questions and answers about all our processes and regulations. We have divided our content in topics, scopes and chapters to help you easily find answers to your questions. You can also filter by the question's ID number, questions developed with the national helpdesks, question field and answer field.

### FURTHER INFORMATION

- [Video tutorial](#)

CLP    Poison Centres    Search Chapter...    Reset filters    Search...

↑ ↓	ID	NHD	Question	Answer
🔍	(All)	🔍	🔍	🔍
1727	<input checked="" type="checkbox"/>	Can mixtures, subject to Annex VIII to CLP, and already placed on the market before the 1st January 2025, remain on the shelves after that date for further supply without a UFI?	Yes, they can, if duty holders already submitted info...	
1929	<input type="checkbox"/>	Who has the duty to submit?	Article 45 places direct submission obligations to im...	
1930	<input type="checkbox"/>	If I import a product in one Member State but do not sell it on the market in that Member State, am I obliged to submit information there?	Yes. The imported mixture may be used at the first ...	
1931	<input type="checkbox"/>	Are companies from the UK covered by this obligation?	Since 1 January 2021, the UK is no longer part of the	

# National CLP helpdesks

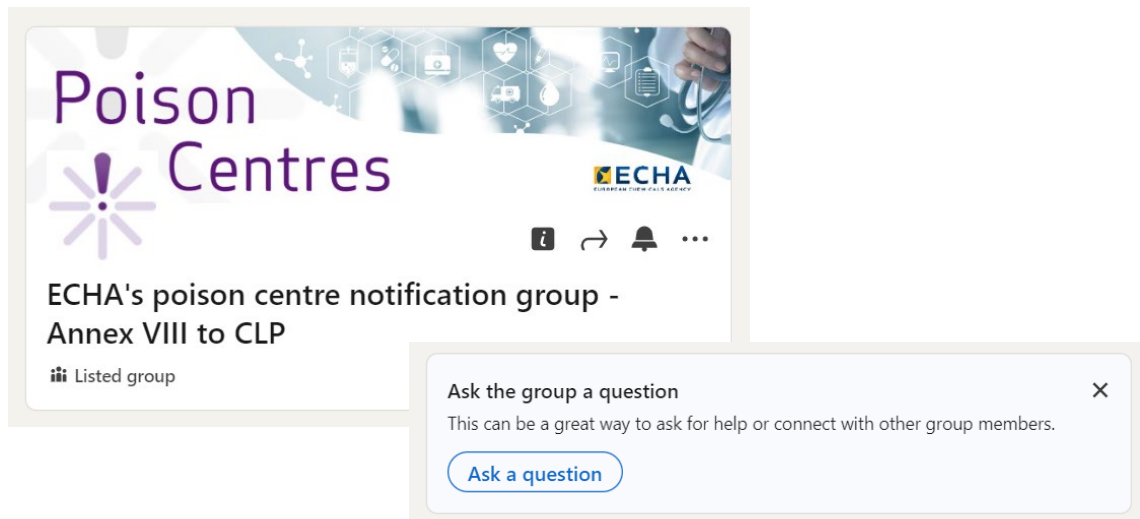
- First point of contact for regulatory questions on poison centre notifications and CLP in general
- [National Helpdesks - ECHA \(europa.eu\)](https://europa.eu)
- Advice harmonised through network of helpdesks, ECHA included



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# LinkedIn

- Place to ask and share experiences



The image shows a screenshot of a LinkedIn group page. The group is titled "Poison Centres" and is described as "ECHA's poison centre notification group - Annex VIII to CLP". The ECHA logo is visible in the top right corner of the group header. Below the group name, there are icons for information, sharing, notifications, and a menu. A dialog box is overlaid on the bottom right of the screenshot, titled "Ask the group a question". The dialog box contains the text "This can be a great way to ask for help or connect with other group members." and a button labeled "Ask a question".

**Poison Centres**

ECHA  
EUROPEAN CHEMICALS AGENCY

ECHA's poison centre notification group -  
Annex VIII to CLP

Listed group

Ask the group a question

This can be a great way to ask for help or connect with other group members.

Ask a question



# Take home messages

- Plenty of information available to prepare for compliance
  - Most support material translated
- [Home - Poison Centres \(europa.eu\)](https://europa.eu)
- Contact your CLP national helpdesk for regulatory support



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# Thank you

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# Closing remarks

Webinar: Poison centre notifications:  
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Regulatory Officer  
European Chemicals Agency



# Remember

- Prepare on time
- Contact customer to confirm end use of mixture
- Contact supplier about notification intentions
- Know your appointed body
- UFI valuable for appointed bodies and poison centres to identify mixture in case of intoxication or accident



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# Compliance date

- From 1 January 2024 new mixtures for industrial use only on the market need to be Annex VIII compliant
- Mixtures already on the market may benefit from transitional period
- From 1 January 2025 all mixtures need new notification and UFI placed on label



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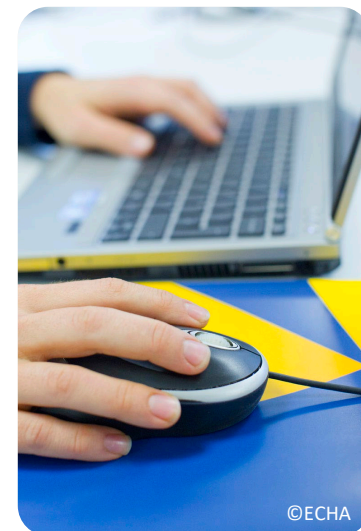
# Closing remarks

- Changes coming from CLP revision that impact scope and duty holders
- Follow our updates and stay informed
- Useful resources:
  - [Web page on new hazard classes 2023](#)
  - [Videos and webinars](#)
  - [Subscribe to our news](#)



# Live Q&A

- Join Q&A at: slido.com  
Event code:
- Send questions from  
11:00 to 13:00 (EET, GMT +2)
- Only questions within scope
- Question not answered?  
Contact us: [echa.europa.eu/contact](https://echa.europa.eu/contact)



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