

Are you prepared for the Annex VIII deadline?

In March 2017, the European Commission released Annex VIII to the Classification, Labelling and Packaging (CLP) Regulation with the aim of harmonising the implementation of Article 45 of the Regulation across the EU.

Who must notify?

Organisations will be required to submit their poison centre notifications for all mixtures classified as hazardous for health and physical effects, via the European Chemicals Agency's (ECHA) new online portal from **January 2021 for consumer and professional use mixtures** and from **January 2024 for industrial use mixtures**.

Notification of mixtures that have a health or physical effect classification is mandatory in most Member States under current legislation. This includes hazardous mixtures, biocides and detergents.

How to be compliant

To be compliant, products must be notified to the appropriate poison centres under Article 45. Notifications submitted before the deadline will benefit from a transition period until 2025 before they must re-notify, unless significant changes to the product are made.

Notification and Brexit

For organisations with a GB only based entity, it is important to also consider that a EU legal entity is required to do poison centre notifications under Annex VIII. Therefore, it is important to also consider your European trade and how you will continue to comply with European legislation like poison centres.

Preparing your poison centre notifications

Use ECHA's online generator to create a unique formula identifier (UFI) for your mixture

You can generate UFIs now in advance of the January deadline. The same UFI may appear on multiple products provided they have the same formulation. Your VAT number and a formulation number can be used to ensure the UFI is unique to a specific mixture. Alternatively, a random UFI can be generated online.

Add the UFI code to your labels

A recent amendment to Annex VIII now allows the UFI to be placed on a product's label or packaging close to the CLP label. You may choose to reprint your labels to include the UFI or affix it separately to the packaging to avoid the increased costs of redesigning labels.

Allocate a European product categorisation system (EuPCS) code

An EuPCS code describes the intended use of a product. Under Annex VIII, each submission must have an appropriate EuPCS code. You can begin allocating these to your products now.

Familiarise yourself with your formulations

The harmonised format requires the full composition of the product to be declared, including non-hazardous ingredients present over 1%. Start to collect the necessary data now – this may require liaising with suppliers to ensure compliance with the minimum data requirements set out in Annex VIII.

Submit your notification dossier

You can prepare and submit your dossier now on the ECHA portal, which is already live. However, they will not be accepted until the Member States Competent Authorities have connected to the ECHA portal. These submissions can only be made by an EU Legal Entity.

Changes under Annex VII

Currently, the notification process is determined by national law. As such, the requirements for industry and the delivery of the poison centre service differs between Member States.

However, under Annex VIII, notification requirements will be harmonised:

- Mandatory notification in all Member States.
- Full composition, including non-hazardous components.
- Inclusion of UFI onto the packaging.
- Changes in fees.
- Reduced notification for industrial mixtures.
- Allocation of an EuPCS code.
- With advice tailored to the circumstances.
- By experts with tactical and regulatory awareness.

About NCEC

NCEC is a leading provider of poison centre notification services. It is also one of the few organisations that continually documents and updates industry on notification procedures for all EU Member States.

NCEC offers a full poison centre notification service for organisations that have an obligation to notify their mixtures classified as hazardous for health and physical effects, and biocides. This service has been developed using our years of experience in researching each Member State's implementation of poison centre legislation and shaping poison centre policy through our work with the European Commission.

For more in-depth information about the content of this poster, please speak to our experts at this event or

Visit our website: www.the-ncec.com/poison-centres

Call us: 1-855-220-0214 / +44 (0) 1235 753654

Email us: ncec@ricardo.com

NCEC
Part of Ricardo