Harmonization of Poison Centre Notifications (PCN) in the EU

EU Product Notification according to Annex VIII to the CLP regulation is a new legal obligation that is not covered by REACH and also not by current CLP notifications. Importers and downstream users (formulators) placing hazardous mixtures on the EU market will have to notify such mixtures in the coming years, deadlines depending on the type of use: consumer use (by 1 Jan. 2020), professional use (by 1 Jan. 2021), or industrial use (by 1 Jan. 2024). The objective of the new regulatory requirement is to enhance the quality and consistency of emergency health response due to availability of reliable information about classified mixtures.

Background: Importers and formulators of hazardous chemical mixtures, placed on the EU Community market, must notify certain information to the appointed national member state poison centres. In accordance with CLP Article 45(4), Annex VIII ‘harmonising information relating to emergency health response’ was added to CLP in March 2017. The amendment was triggered by the fact that the interpretation and implementation of Art. 45 varied between the European countries. Thus a harmonized format for notifications was created along with a Unique Formula Identifier (UFI) on the product label that will allow the poison centres the unequivocal identification of the concerned mixture(s) in case of a reported emergency.

What chemical mixtures should be notified? A chemical product must be notified to a poison centre when all of the following conditions are met:

- **It is a mixture**, as defined by CLP Article 2(8): “a mixture or solution composed of two or more substances”; and
- **It is classified as hazardous**, on the basis of its (eco)toxicological or physical-chemical effects, as stated in CLP Article 45(1); and
- **It is placed on the EU Community market**. CLP Article 2(18) defines ‘placing on the market’ as “supplying or making available, whether in return for payment or free of charge, to a third party. Import shall be deemed to be placing on the market.”
The legal obligation for submission using the new harmonised format does not apply until 2020; however, the draft Poison Centre Notification (PCN) format and editor versions of the tools, along with Q&A's are already available on the ECHA website, along with the Unique Formula Identifier (UFI) generator.

Some companies are expecting to submit more than 100,000 poison centre notifications under the new system. The EU Commission is estimating that the total number could be up to 20 million per year, the steady figure resulting from the necessity to update the notification whenever changes are made to the initially notified composition.

What is your degree of preparedness for PCN? Please come and talk to us if you want to enhance your ability to stay agile and to secure your supply chains in Europe!

For more information, please contact SCC at info@scc-hq.de – thank you.