



**We can help you
take care of your
notifications**

Introduction into EU POISON CENTRE NOTIFICATION (PCN)

Your challenge – our core competence!

EU HARMONISATION OF POISON CENTRE NOTIFICATION (PCN)

Poison Centre Notification is a legal obligation neither covered by REACH nor by CLP C&L Inventory notifications.

Background

Importers and downstream users placing hazardous mixtures on the EU market must notify a minimum set of information to nationally appointed bodies, Poison Centres. In March 2017, a new CLP Article 45(4) was added to Annex VIII related to 'harmonising information relating to emergency health response'. The amendment was triggered by the fact that the interpretation and implementation of Art. 45 varied between the European countries.

With the amendment, a harmonized format for notifications was created along with the requirement to have a Unique Formula Identifier (UFI) on the product label allowing the identification of the concerned mixture(s) in case of a reported emergency.

The harmonised information requirement aims at enhancing the quality and consistency of emergency health response by making available reliable information on classified mixtures. This information is used by Poison Centres for emergency health response purposes in case of incidents involving the notified mixtures.

Who should notify?

Importers and downstream users placing hazardous mixtures on the EU market must notify these mixtures.

This obligation also applies to distributors modifying the label of hazardous mixtures, repackaging hazardous mixtures or launching products to Member State markets where upstream users have not submitted notifications.

Where to submit a notification?

A notification needs to be submitted to the relevant appointed body, e.g. a national Poison Centre, in each Member State where the mixture is intended to be made available on the market.

Compliance deadlines

Annex VIII of the CLP regulation set compliance deadlines for Poison Centre notifications for hazardous mixtures placed on the European Market depending on the type of their use.

Accordingly, the first poison centre compliance date (due on 1 January 2021) applied to hazardous mixtures for consumer and professional use. From 1 January 2021, newly submitted PCN notifications need to comply with the harmonised information requirements outlined in Annex VIII

The second PCN compliance date applies to hazardous mixtures for industrial use only becoming due on 1 January 2024.

Learn more about chemicals compliance at our website:
<https://www.scc-gmbh.de/reach-services-chemicals-compliance>

or contact one of our experts:
scc@scc-gmbh.de

What chemical mixtures should be notified?

A product must be notified 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 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.”

Exempted mixtures

Mixtures classified hazardous only due to environmental hazards are not subject to PCN notifications. The obligation also does not apply to:

- radioactive mixtures;
- mixtures subject to customs supervision;
- mixtures used in scientific research and development;
- medicinal and veterinary products, cosmetic products, medical devices and food and feeding stuffs; and
- mixtures only classified as gases under pressure and explosives.

Existing notifications:

All products notified prior to the compliance deadlines can remain on the market within a transitional period until 1 January 2025 as far as they remain unchanged or are to be discontinued before the end of the transition period. Please note, however:

- If a product needs a submission update, then you need to do this in the new harmonised format.
- If you do not plan to change your product until 1 January 2025, you still need to submit a new notification in the harmonised format, as no migration of data is planned.

Depending on individual Member States, the industry can start using the harmonised information requirements before the relevant compliance dates. For this purpose, the users can apply the PCN format and editor versions of the tools, along with the Unique Formula Identifier (UFI) generator. There is also a Q&A column on ECHA’s Poison Centres website providing continuous updates.

Are you well prepared for PCN? – Don’t hesitate to contact us if you want to enhance your flexibility and secure your supply chains in Europe!

For more information, please contact SCC at scc@scc-gmbh.de – Thank you.

