

The countdown has started: the UFI Code will become compulsory for hazardous mixtures for consumer use on 1 January 2020

There is less than a year left to adjust to the changes introduced by Regulation [2017/542](#) (Annex VIII, CLP). It will bring EU-wide harmonisation and therefore simplification regarding information about mixtures with it. However, the implementation of the Regulation will be preceded by comprehensive internal preparations.

Good news first: if you are distributing hazardous mixtures in different European countries, it is about to get easier for you from 1 January 2020. From this point in time, besides the country-specific notification for consumer products it will also be possible to submit an EU-wide harmonised notification: with a harmonised submission system, its own format for presenting data, and unified data requirements. The notification is then sent to ECHA’s PCN portal, which will take charge of informing the appointed bodies within the countries which are party to the Regulation. Therefore, product information will become less time-consuming and less complex for you to submit, and unambiguous and free of mistakes for the users in the advising poison centres. Despite that, it is worth considering that national special regulations can also apply, in particular regarding the costs estimated by the countries.

Another novelty is that with the introduction of the harmonised notification system, it is no longer importers in the individual countries who are responsible, but those who import a hazardous mixture into the EU or produce it in the EU.

UFI code for quick first aid ...

The most important innovation is the introduction of the so-called UFI (unique formula identifier) code which is affixed to the relevant products as a 16-digit alphanumeric code. As a component part of the product information, it unambiguously links the submitted information to the details on the composition of the mixture available in the poison information centres’ database. The codes can be generated through a generator at ECHA.

... requires clear processes in businesses

To better protect the composition in the supply chain, you may use your supplier’s UFI for your own submission, and do not have to know the complete formula. One thing that you must bear in mind: if, for example, you are supplied with one component of the mixture by several different suppliers over the year, that must be shown on your products through different UFI codes. That requires a very clear documentation, communication and, if necessary, changes in the product’s packaging and storage process within your company. In this case it is appropriate to have safe processes early.

The information in detail

The details required for the harmonised information are partly different from details that are required for labelling or for the safety data sheets.

The following standard details are required for submission:

- Product name
- Submitter
- composition (guidelines in CLP, Annex VIII)
- pH
- Classification and labelling
- Physical state / colour / form
- Toxicological information as in Section 11 of the Safety Data Sheet
- Product details (trade names, categories of usage, packaging)
- Countries where the product is placed on the market
- UFI code

The information should be submitted in the practical XML data format.

Schedule for UFI codes

You only have to satisfy the Regulation for consumer products and their components by 1 January 2020. Other product groups will follow in a pre-determined schedule:

- 01.01.2020: consumer products as well as “semi-finished products” that are used in consumer products
- 01.01.2021: products for professional use
- 01.01.2024: products for industrial use
- 01.01.2025: end of the transition period for product information submitted at national level before 01.01.2020 (does not apply for the German ISi notification!)

Begin preparing now so that you can meet the Regulation by the deadline. Also consider that your trade partners will need to know ahead of time that you can fulfil the harmonised information requirements and affix the UFI code on time. By doing so you can demonstrate that you are a competent trade partner.

asseso – Competence in Product Compliance

There is a lot to do. However, we will be helpful to you with all questions concerning the obligation to inform and the UFI code. We'll manage it.

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