

Notification of hazardous chemical products to the National Poisons Information Centre in Ireland

Background: Importers and formulators of hazardous chemical products, placed on the Irish market, must notify certain information about the products to the National Poisons Information Centre (NPIC), Beaumont Hospital, as the responsible body appointed in Irelandⁱ for receipt of information in accordance with CLP Article 45(1). In addition, where the notified product requires a Safety Data Sheet (SDS), the importer or formulator must include the NPIC emergency telephone number in Section 1.4 of the SDS. This is explained in more detail below.

What chemicals products should be notified? A chemical product must be notified to the poisons centre in Ireland when all of the following conditions are met:

- ✓ **It is a mixture**, as defined by CLP Article 2(8)ⁱⁱ: ‘a mixture or solution composed of two or more substances’; and
- ✓ **It is classified as hazardous**, on the basis of its health or physical effects, as stated in CLP Article 45(1); and
- ✓ **It is placed on the Irish 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.’”

Who needs to notify? It is the importer of a chemical product (mixture) into the EU or the formulator of a chemical product within the EU, placing them on the Irish market that is responsible for notification to the poisons centre. Notwithstanding any contractual arrangements that a distributor may have with their importer or formulator, in accordance with CLP, a distributor has no direct role in the notification of a chemical product to a national poisons centre. The responsibility lies with the importer or downstream user (formulator), as set out in CLP Article 45. If in doubt, the distributor should make enquiries with their supplier to ensure the notification to the NPIC has been completed.

What information needs to be notified? The information requirements are set out on the NPIC website <http://www.poisons.ie/Manufacturers/Product-Registration>

Where is the notification sent to? The notifications should be sent directly to the NPIC at Beaumont Hospital. Tel: +353 1 8092566, email: chemicalsinfo@beaumont.ie website: www.poisons.ie

Will the information to poisons centres be harmonised? Yes it will; in accordance with CLP Article 45(4), Annex VIII ‘harmonising information relating to emergency health response’ⁱⁱⁱ was added to CLP in March 2017 and amended in 2019^{iv}. The legal obligation for submission using this new harmonised format does not apply until 2021; however, the Poisons Centre Notification (PCN) format and tools, along with Q&A’s are available on the ECHA website, along with the Unique Formula Identifier (UFI) generator. Please note that the NPIC is not yet able to accept PCN submissions. However, you can provide the information specified in Annex VIII on the NPIC Product Registration Form. Further information is available at <https://poisoncentres.echa.europa.eu/home> and the [ECHA guidance on Annex VIII](#) (dated May 2020)

Do I need to notify other EU poisons centres? Yes, when a hazardous chemical product is placed on the market in another EU Member State it also requires notification to the poisons centre of that Member State, where established. There is a list of European Poisons Centres available at the following [link](#)

CLP Article 45 states: *Member States shall appoint a body or bodies responsible for receiving information relevant, in particular, for formulating preventative and curative measures, in particular in the event of emergency health response, from importers and downstream users placing mixtures on the market. This information shall include the chemical composition of mixtures placed on the market and classified as hazardous on the basis of their health or physical effects, including the chemical identity of substances in mixtures for which a request for use of an alternative chemical name has been accepted by the Agency, in accordance with Article 24*

Safety Data Sheets and Emergency Numbers: In accordance with the provisions of Annex II of REACH⁴, it is obligatory to include a poisons centre emergency number in Section 1.4 of an SDS, taking note of the following:

- ✓ Any chemical product that meets the provisions outlined above should be notified to the poisons centre in Ireland and the associated safety data sheet for that chemical product should include the NPIC emergency contact number.
- ✓ It is permitted to include (in addition) an external emergency number, as appropriate.
- ✓ The NPIC emergency number cannot be used in Section 1.4 of an SDS until the notification process, which includes the payment of an annual fee, is complete. The notification process is explained on the NPIC website <http://www.poisons.ie/Manufacturers/Product-Registration>
- ✓ Where there is a delay in updating the SDS with the NPIC emergency number after the notification process is complete, the company needs to ensure that the additional emergency number, currently listed in section 1.4, continues to operate effectively in English. If there are any limitations to its use, this should be clearly stated in the SDS, until such time as the SDS is updated with the NPIC number.
- ✓ When placing hazardous chemical products on the market in other EU Member States, the respective poisons centre/appointed body number, where established, is required to be included in Section 1.4 of the SDS. Further information is available on the ECHA website under the [National Helpdesk contact details](#). The poisons centre number in one EU Member State may not be used for other Member States.

Annex II of REACH states: *“References to emergency information services shall be provided. If an official advisory body exists in the Member State where the substance or mixture is placed on the market (this may be the body responsible for receiving information relating to health referred to in Article 45 of Regulation (EC) No 1272/2008), its telephone number shall be given and can suffice”.*

ECHA guidance on the compilation of SDSs states: *The supplier must provide a reference to emergency information services. If an official advisory body as defined in the legal text above exists reference to it must be made. Otherwise (or in addition) reference to an emergency service belonging to the supplier himself or to a competent third party provider of such a service must be made. Where the supplier provides his own emergency information service, be it alone or in combination with an official advisory body or other provider, the necessary competence should be available”.*

References

ⁱ http://www.hsa.ie/eng/Legislation/Acts/Chemicals_Acts_2008_and_2010_and_the_Guide/

ⁱⁱ CLP Regulation 1272/2008

ⁱⁱⁱ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0542>

^{iv} <https://ec.europa.eu/transparency/regdoc/rep/3/2019/EN/C-2019-7611-F1-EN-MAIN-PART-1.PDF>

^v REACH Regulation 1907/2006