

## Poison Centre Notifications for Hazardous Chemical Mixtures in Ireland

In accordance with the EU CLP Regulation, Annex VIII, importers, downstream users (formulators) and distributors (under certain conditions) placing mixtures classified as hazardous for human health or physical effects on the EU market must provide specific information on these mixtures to appointed bodies. In Ireland, the National Poisons Information Centre (NPIC), Beaumont Hospital, is the responsible body appointed for receipt of information in accordance with CLP Article 45(1).

Information Sheet



#### Who needs to notify?

The EU importer, downstream user (formulator) or potentially the distributor within the EU who places the mixture on the Irish market is responsible for notification. The 2024 update (Regulation (EU) 2024/2865) to the CLP Regulation clarified the role of distributors as potential duty holders for poison centre notifications. Distributors - companies that relabel, rebrand or retail hazardous mixtures are now duty holders and may need to submit information on hazardous mixtures to poison centres. This is needed unless all information is already available to the relevant authorities. If no notification is made to the poison centre in a Member State where the mixture is placed on the market, or new product identifiers are included on the label, the distributor needs to either:

- provide the necessary information to the supplier or original poison centre notifier for them to include this in their submission; or
- submit their own poison centre notification.

The obligation on distributors will apply as of 1st January 2027, although it can be applied on a voluntary basis by distributors before then.





#### Products to be notified

A chemical product must be notified in Ireland when all 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'.
- It is classified as hazardous on the basis of its health or physical effects.
- 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'.

#### Information to be notified

- Name, address, contact details of the notifier.
- Trade name(s) of the mixture, and if appropriate, brand names or other names as per the label.
- Packaging type and size; size meaning the nominal weight/volume of the packaging.
- Product category in accordance with the harmonised European product categorisation system (EuPCS). The category should match the main intended use of the product, e.g. 'detergent'.
- Unique formula identifier (UFI); Sixteen character alpha-numerical product specific code generated by the UFI generator <a href="https://poisoncentres.echa.europa.eu/ufi-generator">https://poisoncentres.echa.europa.eu/ufi-generator</a>. The UFI must be affixed to the label.
- Human health and/or physical hazards classification. The submission of hazard pictogram(s), signal word, hazard statement(s), supplemental hazard information and precautionary statements is required.

- Toxicological information; overview of likely exposure to the mixture as per section 11 of the Safety Data Sheet (SDS).
- Information on physico-chemical properties.
- Full mixture composition, including all components, their concentrations in the mixture and classification. Components may be substances or mixtures in mixtures and there are specific rules regarding how they are identified and their concentrations reported.



# The notification procedure in Ireland

The information on mixtures for consumer, professional or industrial use must be prepared in the EU-harmonised PCN format and submitted to the NPIC via the European Chemicals Agency (ECHA) PCN submission portal (https://poisoncentres.echa.europa.eu/tools).



## Notification to other EU poison centres

A submission must be made to the appointed body in each Member State where the hazardous mixture is placed on the market. The notification must be in the language of that Member State. The ECHA PCN submission portal supports the multi-country submission by dispatching the notification to the relevant appointed bodies.

#### Non-EU companies

Mixture suppliers based outside the EU are not duty holders under CLP and cannot fulfil poison centre notification obligations. The non-EU suppliers can support their EU customers by providing the necessary information to allow them to comply with their submission obligations. Alternatively, the non-EU supplier may decide, in agreement with the EU importer, to make a voluntary submission (through an EU-based legal entity) and provide the UFI to the actual EU importer, who will then make their own submission under Annex VIII referring to that UFI in the composition.





### Safety data sheets and emergency numbers

In accordance with the provisions of REACH Annex II, it is obligatory to include a poison centre emergency number in Section 1.4 of an SDS, taking note of the following:

- 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. See <a href="https://poisons.ie/industry-manufacturers/safety-data-sheets/">https://poisons.ie/industry-manufacturers/safety-data-sheets/</a> for details.
- Where there is a delay in updating the SDS with the NPIC emergency number after the notification process is complete, it needs to be ensured that the additional emergency number 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 mixtures 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. The poisons centre number in one EU Member State may not be used for other Member States.



#### **Annex II of REACH:**

"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:

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.



#### **Further information:**

Email queries to chemicals@hsa.ie

Visit: www.hsa.ie/chemicals

www.poisons.ie

www.poisoncentres.echa.europa.eu



