

What is a UFI?

Webinar: using the UFI for your products and mixtures

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'New' Annex VIII to CLP

- Published in March 2017 for the harmonisation of information relating to emergency health response
- Obligation for importers and downstream users placing hazardous mixtures on the market
- Concerns mixtures classified for health and physical hazards
- Submissions made to national appointed bodies
-> make information available to poison centres



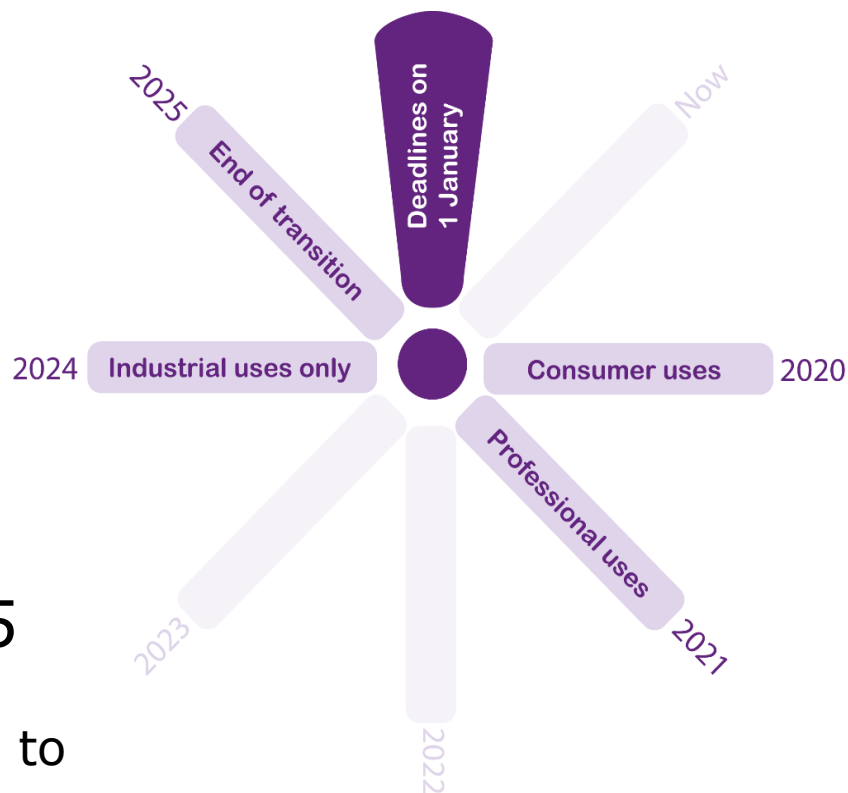
What we do

Provide technical and scientific guidance, technical support, and tools facilitating the submission of information

- UFI Generator
- Product categorisation system (EuPCS) version 1.0 published
- Harmonised format (PCN format) coming soon
- Guidance and support material end of 2018
- Central submission portal (PCN portal) early 2019

Phased deadlines

- **By 1 January**
 - 2020 for consumer uses
 - 2021 for professional uses
 - 2024 for industrial uses
- **End of transition period 2025**
Unless change made to existing notification from the relevant deadline to the end of the transition period



Submission of harmonised information

- Full chemical composition
- Toxicological information
- Label elements
- Product category (from EuPCS)
- Details of product (trade name...)
- Additional details (packaging, colour...)
- Unique Formula Identifier (UFI)

Why is a UFI needed?

- Problematic identification of products 40% of calls
- More accurate advice and avoiding over precautions treatment
- UFI concept to help

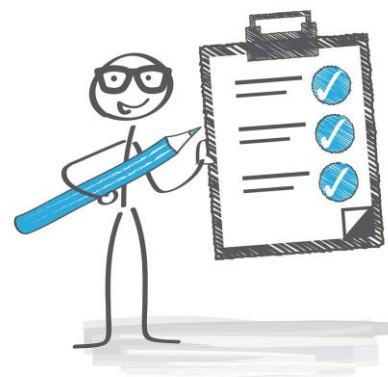


UFI: another element of information, but...

- In the submission with all the Annex VIII requirements

AND

- Printed on, or affixed (e.g. by a sticker) to the label



What does a UFI look like?

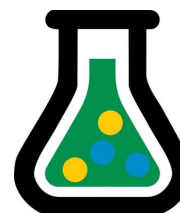
- Code with a defined format
 - 16 alpha-numerical characters
 - Upper case letters
 - Separated by hyphen into 4 blocks
 - Avoids ambiguous letters e.g. 'O', 'I', 'L', 'B', and 'Z'
 - Checksum character

VDU1-414F-1003-1862

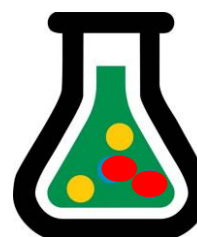
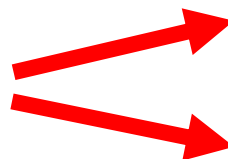
What is a UFI assigned to?

- General rule is that a UFI is assigned to only 1 mixture **composition**

UFI: VDU1-414F-1003-1862



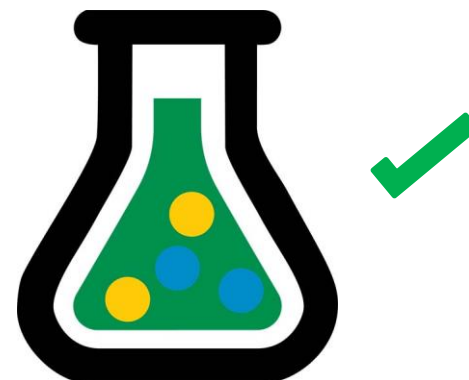
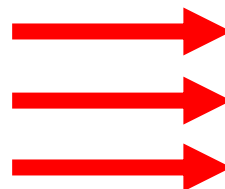
UFI: VDU1-414F-1003-1862



UFI is flexible

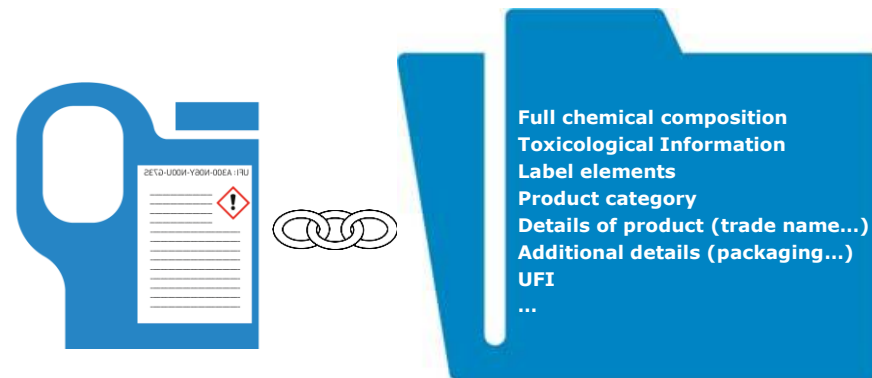
- 1 mixture composition may have multiple UFIs assigned to it

UFI: VDU1-414F-1003-1862
UFI: X800-U0RP-S009-1KM3
UFI: 8XD3-W0EC-T00G-ATYX



How does the UFI work?

- UFI works to link a specific product on the market to the submitted mixture information



- Read from the label of a product in an emergency to poison centre operator
- Protects confidential business information

UFI for poison centres

- UFI used with other information e.g. trade name or product category
- Rapidly identify exact product involved in an incident
- Distinguish between two mixtures with the same trade name
- Confirm that the product was correctly identified





UFI for industry

- UFI can be safely used in the supply chain to protect confidential business information of mixture composition (MiMs)
 - instead of disclosing full composition
- In order to do this: UFI and other information must be submitted to keep the integrity of the link for poison centres

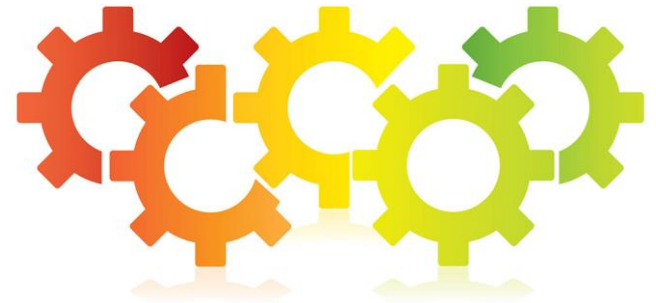
Including the UFI on the label

- Printed on, or affixed to the label
- Clearly visible, legible, and indelibly marked
- Preceded by the acronym 'UFI'
- Adapt labels for individual products
- UFI is a label element and needs to be reflected in section 2.2 of the safety data sheet



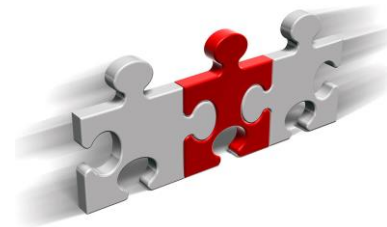
Derogations and considerations

- Other packaging and labelling considerations?
 - Industrial mixtures – safety data sheet section 15
 - Mixtures not packaged – safety data sheet section 15
 - Packaging layers, small packages, unit dose packaging
 - Transport packaging
 - Fold-out labels, tie-on tags...
- Guidance on labelling and packaging updated



Creating a UFI

- Industry obligation
- Online UFI generator
 - Final version online
- Developer's manual (UFI algorithm)
 - To develop own 'Generator' in own system
 - Algorithm public – so industry generate own UFIs



What makes UFI so unique?

- Creating a 'unique formula identifier' requires:

Formulation specific; not
unique

Company specific; unique and
(generally) not confidential

'fNb*' & 'VAT* number'

- Unique VAT avoid duplication of UFIs generated by different companies resulting from same formulation number
- 'VAT 1' & 'fNb 1' will always give 'UFI 1'

* formulation number and value added tax number

What the UFI tells you

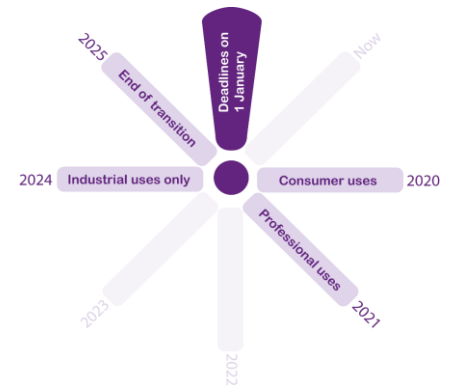
- After a series of transformations, the UFI can only retrieve:
 - a VAT number
 - a formulation number (fNb)

VDU1-414F-1003-1862 -> 'VAT number' & 'fNb'

- Not possible to retrieve information on the composition of the mixture

More about the VAT

- VAT is used only to ensure unique code
- No cross checks made on VAT and submitter
- **NOT** about tracing a product or company
- Possible VAT number used can be different from the submitter
 - e.g. private labellers, toll formulators, subsidiary versus mother company, consultants, ...
- No gain from misusing another company's VAT



Timelines

- UFI needs to be on label and submitted
 - Consumer 2020, professional 2021, industrial 2024
- For mixtures already notified - transition period ends 2025 unless change made
- Reprinting of labels needs to be planned
- Start placing UFI on label already now and the latest by the relevant deadline

To summarise

- UFI generation is industry's obligation
- On the label (or safety data sheet and in the submission)
- UFI submitted with all information (Annex VIII)
- UFI only meaningful once submitted
- The UFI is a link - code itself does not reveal any compositional information
- UFI is unique per mixture composition but also flexible
- Re-labelling require planning for approaching deadlines – can start now!

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