Forum report of the pilot project on the enforcement of the notifications to the Poison Centres

February 2026

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This report presents the results of inspections made under the Forum enforcement project. Duty holders and substances or mixtures selected for checks were those that were relevant for the scope of the project. Forum's projects do not collect information on specific duty holders or products as it is not relevant for the evaluation of compliance or for Forum's task to harmonise enforcement.

The project was not designed as a study of the EU-EEA market. The number of inspections for individual countries is varied. Accordingly, the results presented in the report are not necessarily representative of the situation in the EU-EEA market as a whole.

FORUM PROJECT REPORT
Enforcement of the notifications to the Poison Centres
Reference: ECHA-26-R-01-EN
ISBN: 978-92-9468-526-1
Cat. Number: ED-01-26-003-EN-N
DOI: 10.2823/7202987
Publ.date: February 2026
Language: EN

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Glossary

Word	Explanation
AB	Appointed Body (-ies) (Article 45 of CLP)
CARACAL	Competent Authorities for REACH and CLP
CLP[1]	Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures
ECHA	European Chemicals Agency based in Helsinki, Finland
EEA	European Economic Area
EU	European Union
EuPCS	European Product Categorisation System
MS	Member States belonging to the EU/EEA
NEA(s)	National enforcement authority(-ies)
PC	Poison Centre
PCN	Poison Centre notification
REACH[2]	Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
REF	REACH-En-Force EU/EEA wide harmonised enforcement project coordinated by the ECHA Forum for exchange of information on enforcement (the Forum)
SDS	Safety Data Sheet
SME	Small and Medium Enterprise (Small and Medium-sized Enterprises (SMEs) - ECHA (europa.eu))
UFI	Unique Formula Identifier (code)

[1] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008R1272&qid=1623668902085
[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A02006R1907-20150925

1. Executive summary

In the first half of 2025 the European Chemicals Agency's Forum for Exchange of Information on Enforcement (Forum) conducted a pilot project to harmonise the enforcement of Poison Centres Notifications (PCNs) across the EU/EEA.

The project aimed to evaluate compliance and raise awareness of Article 45 and Annex VIII of the CLP Regulation including Unique Formula Identifier (UFI) obligations, as well as relevant REACH provisions (Article 31 and Annex II – related to Safety Data Sheet (SDS)).

In total, 18 countries participated, covering almost two-thirds of EU/EEA states. This high participation reflects strong interest in harmonised enforcement of the duties under the scope of the pilot project.

A total of 1597 mixtures were inspected between January and June 2025, covering all use types (consumer, professional and industrial) and all operators placing hazardous mixtures on the market. Inspections were conducted on-site, via desktop or both.

Of all the inspected mixtures, 71% came from small and medium enterprises (SMEs).
The compliance rate between the SMEs (59%) and large companies (58%) was similar.

For the mixtures where the PCN submission was required, the non-compliance rate was 19%.

Downstream users were the largest group of notifiers (44%) and also the most frequent source of missing mandatory PCNs (28%).

For the mixtures where the UFI was mandatory, it was present (in the PCN, on the label or in the SDS) in 88% of cases and it was missing in 12% of the cases. Specifically on product labels, the mandatory UFI was missing in 15% of checked mixtures.

Most UFIs (97%) were placed correctly on the label, and nearly all (98%) were also structured correctly. Similarly high compliance (98%) was observed for the UFI correctly placed in Section 1.1 of the SDS.

Non-compliances were observed due to lack of consistency between the information in the PCN and the information on the label and in the SDS. For 13% of mixtures the information was inconsistent between the label and PCN, mainly in labelling elements. For 17% of mixtures the information about the mixture in the PCN were inconsistent with the SDS, especially regarding mixture components and toxicity.

Written advice was the most common enforcement measure (68%), followed by verbal advice, administrative orders, fines, and criminal complaints. A certain number of cases were still under follow-up at reporting time.

The summarised recommendations that result from the pilot project (see Chapter 4.2) are:

- industry/associations: importers are advised to make business agreements with non-EU/EEA formulators to guarantee PCN compliance; associations to raise awareness of the UFI and notification requirements and promote safe use of their mixtures,

- the European Commission: facilitate enforcement authorities' access to PCN data submitted to their country and enable authorities to have at least access to PCN submissions reports; ensure reasonable transitional periods for stakeholders following changes in legal interpretation,

- inspectors: integrate PCN checks into routine inspections, maintain cooperation with Poison Centres,

- Member States: create national procedures allowing the access for enforcement authorities to relevant PCN data; raise awareness about PCN/UFI requirements and use ECHA resources for awareness campaigns,

- consumers: learn to recognise hazardous mixture labels and understand the importance of the UFI.

2. Introduction

The pilot project was carried out with the aim of harmonising enforcement of the provisions on Poison Centres Notifications for mixtures that are classified as hazardous for physical and/or health hazard according to the CLP criteria.

The project goal was also to raise the awareness of duty holders concerning the legal requirement (Article 45) and the obligation to place the UFI on the label or inner package of the product.

The project covered Articles 25, 29, 45 and Annex VIII to the CLP Regulation and Article 31 and Annex II to the REACH Regulation (see Table 1).

Table 1: CLP and REACH legal provisions

Reg.	Relevant legal provisions	Summary
CLP	Article 25(7)	Defines the UFI as supplemental information that should be located with the other CLP-labelling elements.
	Article 25(8)	UFIs of all the mixtures contained in the bespoke paint in a concentration exceeding 0,1 % which themselves are subject to notification under Article 45 shall be included in the supplemental information on the label of the bespoke paint. In case the concentration of a mixture with UFI in the bespoke paints exceeds 5%, the concentration of that mixture shall also be included in the supplemental information.
	Article 29	Exemptions from labelling and packaging requirements
	Article 29 (3)	When a hazardous substance or mixture is supplied to the general public without packaging it shall be accompanied by a copy of the label elements
	Article 29(4a)	UFI can be printed on or affixed to the inner packaging, as long as it is with the other label elements and clearly visible
	Article 45	Appointment of bodies responsible for receiving information relating to emergency health response from importers and downstream users placing mixtures on the market
	Annex VIII	Harmonised information relating to emergency health response and preventative measures. Part A General requirements, Part B Information contained in a submission, Part C Submission format, Part D Standard formulas
REACH	Article 31	Requirements for Safety Data Sheets
	Annex II	Requirements for the compilation of Safety Data Sheets Section 1.1. Product identifier Where a mixture has a unique formula identifier (UFI) in accordance with section 5 of Part A of Annex VIII to Regulation (EC) No 1272/2008 and that UFI is indicated in the safety data sheet, then the UFI shall be provided in this subsection.

The operational phase of the Forum pilot project ran between January and June 2025. The participating countries were supported by the Forum Working Group.

Checks on the mixtures in scope of the project concerned mainly, but not exclusively, the UFI and other aspects in the notification to poison centres. The mixtures in focus of this project were consumer products, but enforcement of professional and industrial products was also an option.

Each Member State was free to decide on the number of inspections conducted as well as on the number/type of mixtures to be targeted.

Companies of all sizes were checked.

Main target groups were the primary duty holders under Article 45 of CLP, importers and downstream users[3] (formulators, re-fillers, re-packagers), who place mixtures on the market that are classified for health and physical hazards under the CLP Regulation.

Optionally, inspectors could check distributors i.e. rebranders, relabellers and retail distributors even though these operators did not have direct obligations under Article 45 during the operational phase of this project. However, distributors could be required to make information available according to Article 4(10)[4] as they shall not place on the market a mixture which is not compliant with CLP in general.

While rebranders and relabellers are generally considered as distributors with no direct Article 45 obligations, some Member States consider rebranders and relabellers as downstream users with direct obligations under Article 45. For this reason, the project decided to separate different duty holders, namely i) downstream users, ii) distributors (without re-branders and re-labellers) and iii) rebranders and relabellers, so that the questionnaire could be answered regardless of the interpretation of their Member State. In the revised CLP, specific obligations for distributors now exist as detailed in Article 45(1.c) which will be applicable from 1 January 2027.

Considerations when interpreting results

When the project was conducted in the first half of 2025, it was understood that some mixtures on the market may exist without a UFI code on the label if duty holders already submitted information based on national requirements and benefitting from the transitional period (ending 1 January 2025). This in turn allowed retailers (distributors) who had received a hazardous mixture before January 2025, to still place it on the market without a UFI on the label.

It should be noted here that this interpretation changed in the updated Questions and Answers #1727 towards the end of the project in June 2025, which retrospectively concluded that as of 1 January 2025, all mixtures placed on the EU market and classified as hazardous based on their health or physical effects must bear a UFI on the label. As a result, all actors in the supply chain must cooperate to meet CLP requirements and ensure the UFI is affixed to the label.

This change of interpretation needs to be considered when interpreting the results outlined in section 3.3 'Presence of UFI'.

[3] Downstream users are 'Any natural or legal person established within the EU, other than the manufacturer or the importer, who uses a substance, either on its own or in a mixture, in the course of their industrial or professional activities (Article 2(19) of CLP).'

[4] This obligation changes following the new provisions stemming from the revised CLP Regulation in Article 45(1.c) which require distributors to notify appointed bodies in certain situations.

3. Results

The names of the inspected companies and mixtures were not reported for this project. The information was not collected since it was not needed for the main purpose of the project to harmonise and strengthen the national enforcement at EU/EEA level. Only information on the company size was collected.

The following chapters present the detailed results of the project. Percentages have been rounded in most cases, and they add up to 100% for results presented in this report.

3.1. Participating countries and number of inspections

A total of 18 countries participated in the pilot project (Belgium, Cyprus, Denmark, Finland, Germany, Greece, Hungary, Ireland, Italy, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Portugal, Romania, Slovenia, Sweden), that equates to almost 2/3 of all EU/EEA countries (see Figure 2).

Table 2: Number of inspections reported in each country participating in pilot project.

No	Participating country	Number of inspections
1	Belgium	**150**
2	Cyprus	**37**
3	Denmark	**19**
4	Finland	**73**
5	Germany	**474**
6	Greece	**26**
7	Hungary	**133**
8	Ireland	**82**
9	Italy	**105**
10	Liechtenstein	**65**
11	Lithuania	**40**
12	Luxembourg	**40**
13	Malta	**6**
14	Netherlands	**113**
15	Portugal	**51**
16	Romania	**76**
17	Slovenia	**10**
18	Sweden	**97**
	TOTAL	**1597**

During the inspections, 1597 different mixtures have been checked.

Inspectors checked mixtures that were intended for consumer, professional or industrial use. Of all 1597 checked mixtures 83% were intended for consumer use, 39% for professional use and 18% for industrial use. Note that a mixture could have multiple use types.

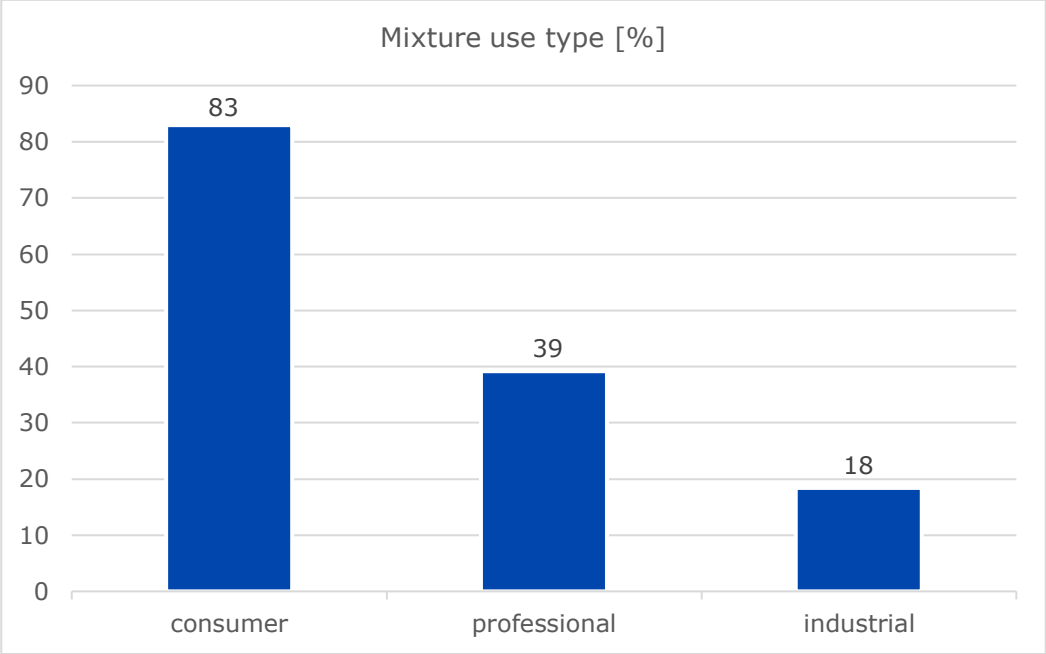

Figure 1. Mixture use type [%]

The inspections (total 1597) were conducted as either a desktop inspection in 32%, on-site inspections in 28% and as a combination of both in 41% (see Figure 2).

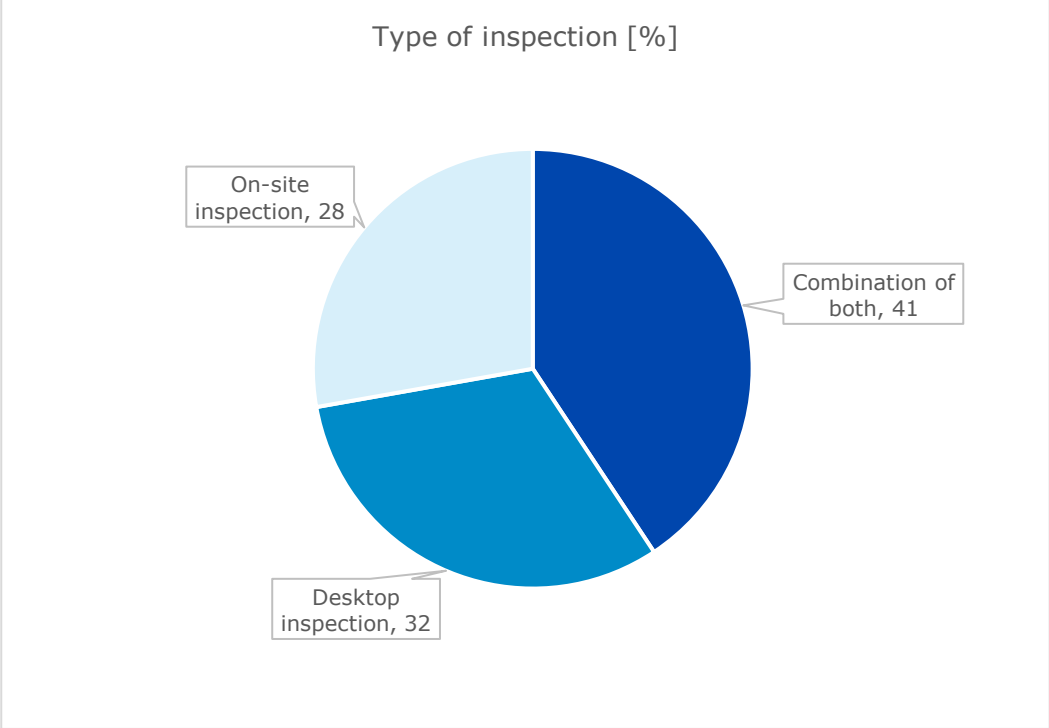

Figure 2: Type of inspection [%]

3.1.1. Compliance rate based on size of companies

Of all 1597 checked mixtures, 71% came from small and medium enterprises (SMEs) and 29% from large companies.

When checking the compliance rate for SME companies (total 1129), 59% of the SME-companies were compliant and 41% of them were not compliant.

For large companies (total 468), the compliance rate was 58% and non-compliance rate 42%.

Figure 3 shows the compliance and non-compliance rate for SME and Large companies, based on size of the company.

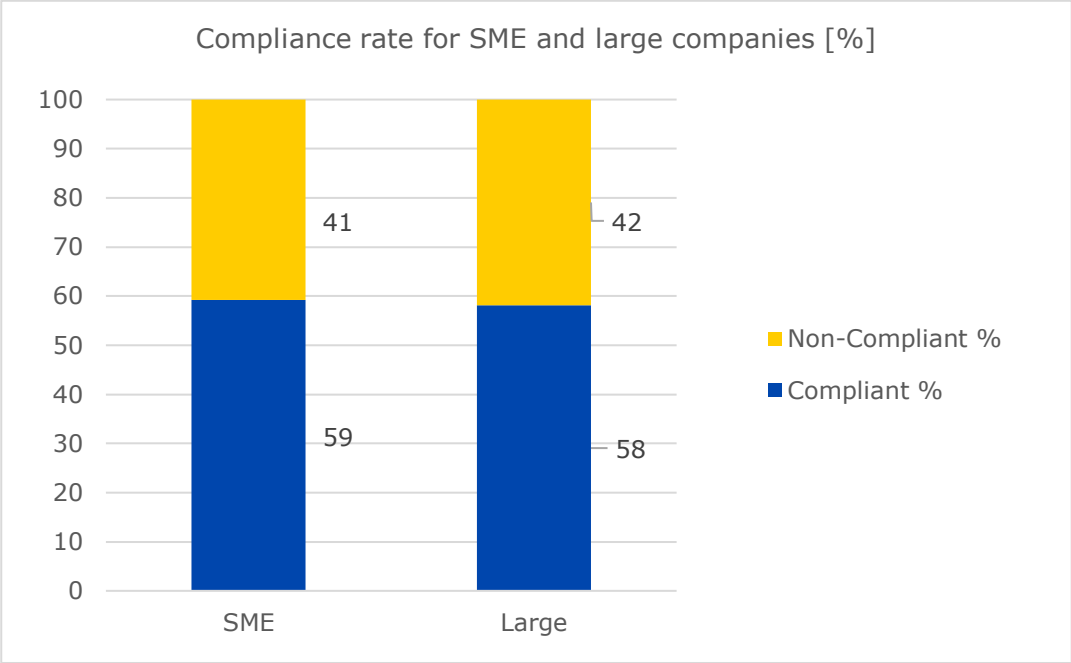

Figure 3. Compliance and non-compliance rate for SME and large companies [%]

3.1.2. Compliance rate based on country of origin

From the 1597 mixtures that were inspected:

- 77% (1234) were formulated within EU/EEA: 739 of these mixtures (46% of the total 1597) were compliant and 495 (31%) were not compliant,
- 12% (198) were imported from a non-EU/EEA country: 99 of these mixtures (6% of the total 1597) were compliant and 99 (6%) were not compliant,
- for 10% (165), the origin was not known: 103 of these mixtures (6% of the total 1597) were compliant and 62 (4%) were not compliant (see Figure 4)[5].

The mixtures that were imported from a non-EU/EEA originated from China, Japan, Serbia, Singapore, South-Korea, Switzerland, Taiwan, Türkiye, the United Kingdom and the United States of America.

[5] Percentages have been rounded down but the results sum up to 100%.

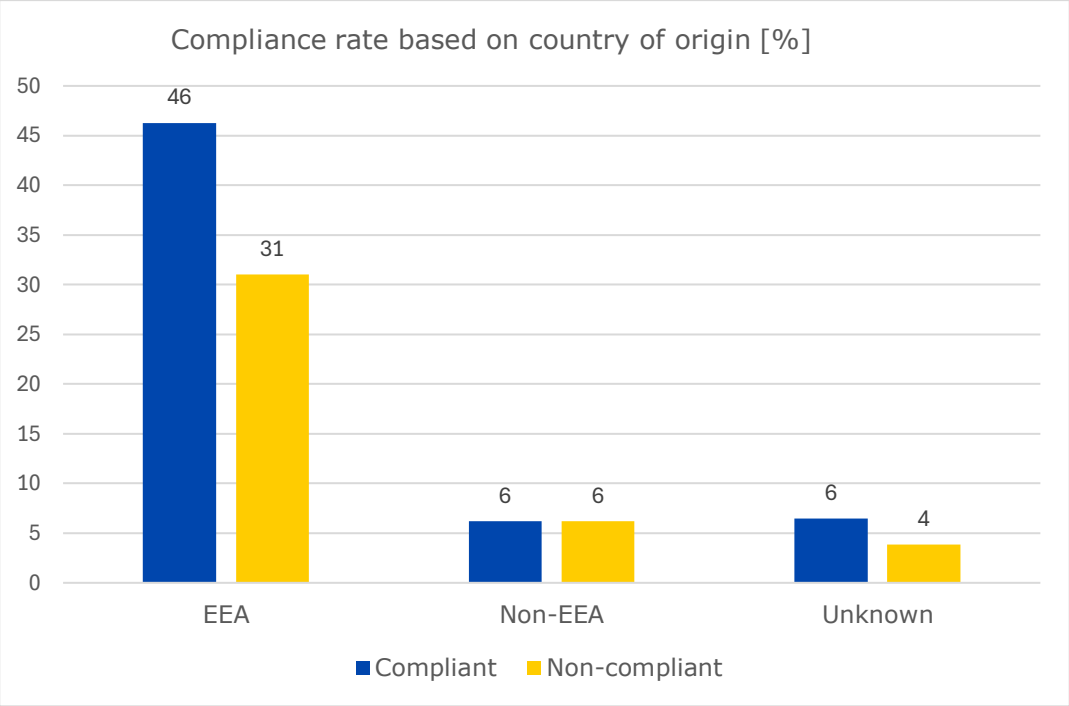

Figure 4. Compliance and non-compliance rate based on the country of origin. % calculated on the total of cases in the project (1597).

3.1.3. Co-operation with Appointed Bodies and Poison Centres

The project aimed to increase the cooperation between enforcement authorities and Appointed Bodies (AB)/Poison Centres (PC). During the project, the National Enforcement Authorities (NEAs) have in some cases been cooperating with AB as well as PC for their enforcement. In 43% of all 1597 inspected mixtures, NEAs were in contact with the AB or PC in their respective country.

3.2. Notifications to Poison Centres

A PCN should be submitted when mandatory, according to its CLP classification, or can also be submitted voluntarily.

From all 1597 mixtures inspected:

- 72% (1156) were notified as mandatory notifications,
- 7% (116) were notified as voluntary notifications,
- 17% (276) were not notified despite being legally required under CLP,
- 3% (49) were not notified, but notification was not required (see Figure 5)[6].

[6] Percentages have been rounded down but the results sum up to 100%.

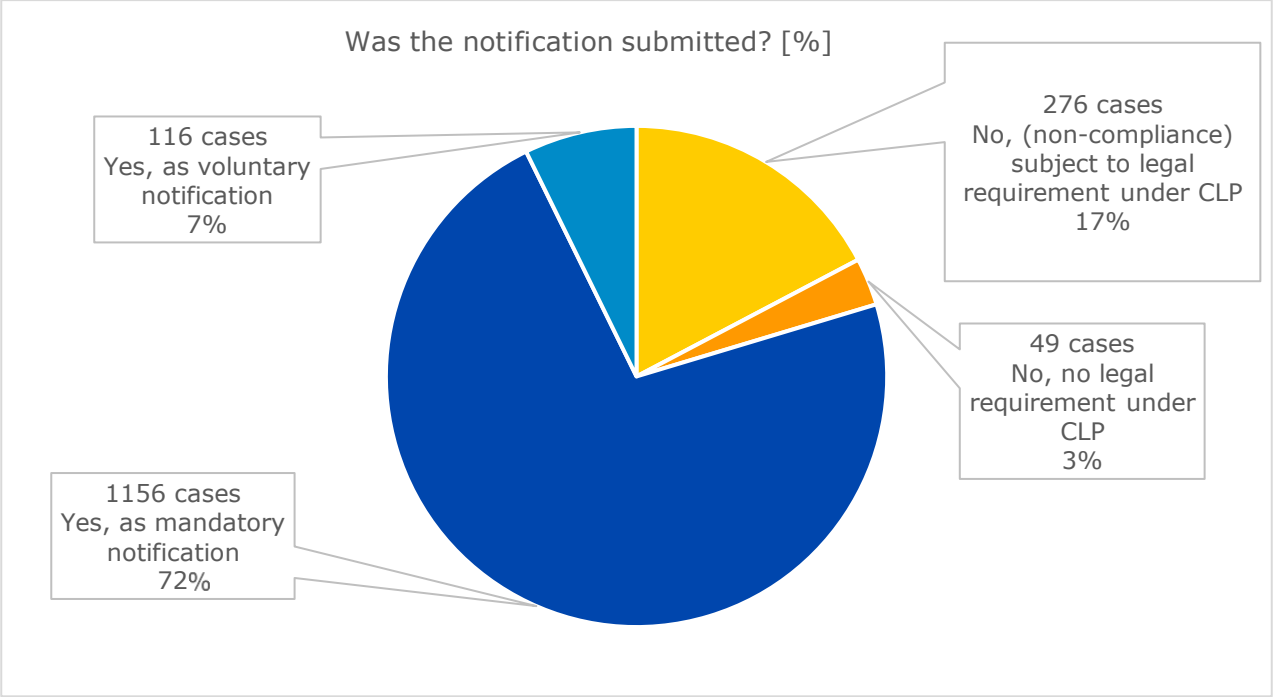

Figure 5: Ways in which the PCN was submitted for the checked mixtures [%]

The non-compliance rate for the duty to submit a PCN was 19% (see Figure 6).
This is calculated only for mixtures where the PCN submission was required (1432).

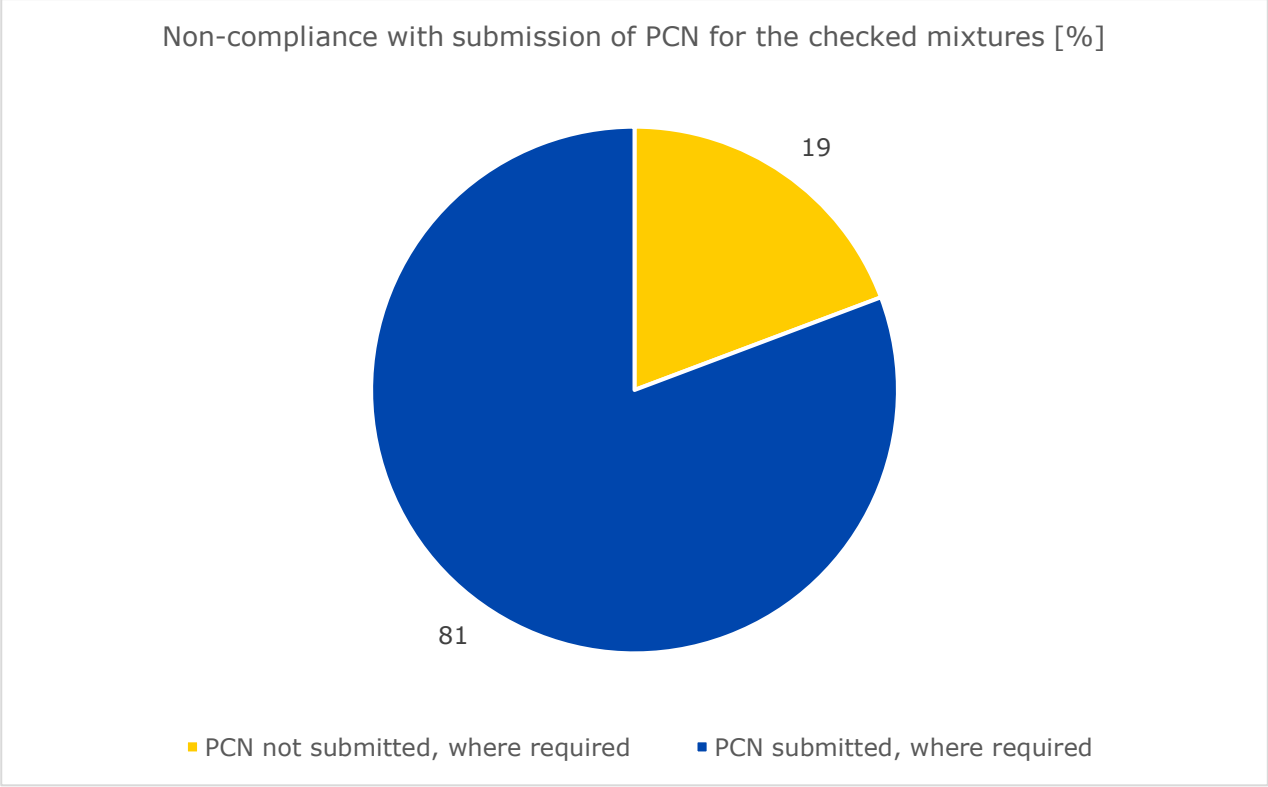

Figure 6: Non-compliance with submission of PCN for the checked mixtures [%]

Analysis of the 1272 cases where PCN was submitted (as mandatory or voluntary notifications) for the inspected mixtures shows that downstream users were the largest group of notifiers, accounting for 44%. Importers were responsible for 19% notifications, distributors without re-branders or re-labellers for 12%, and re-branders or re-labellers for 4%. A further 21% of

PCNs originated from other legal entities or suppliers[7] (see Figure 7).

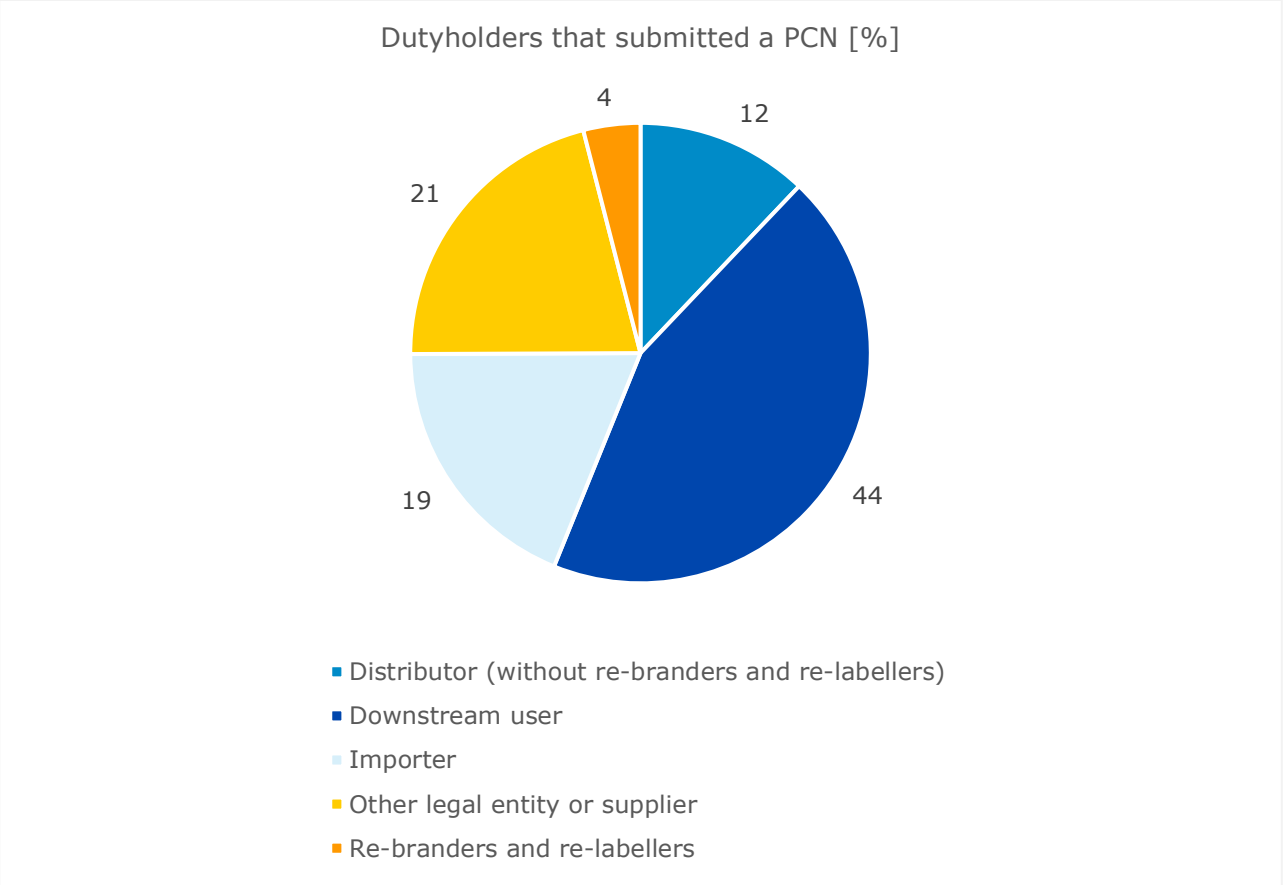

Figure 7: Dutyholders that submitted a PCN [%]

For the subset of 17% of mixtures where PCN had not been submitted despite a legal obligation (276), analysis shows that downstream users were responsible in 28% of cases. Distributors without re-branders or re-labellers accounted for 23%, importers for 19%, re-branders or re-labellers for 12% and other legal entity or supplier for 2%. In 20% of cases, the responsible party could not be determined[8] (see Figure 8).

[7] The data regarding who the other legal entities or suppliers were, was not collected during the project.
[8] The data why the responsible party could not be determined, was not collected during the project.

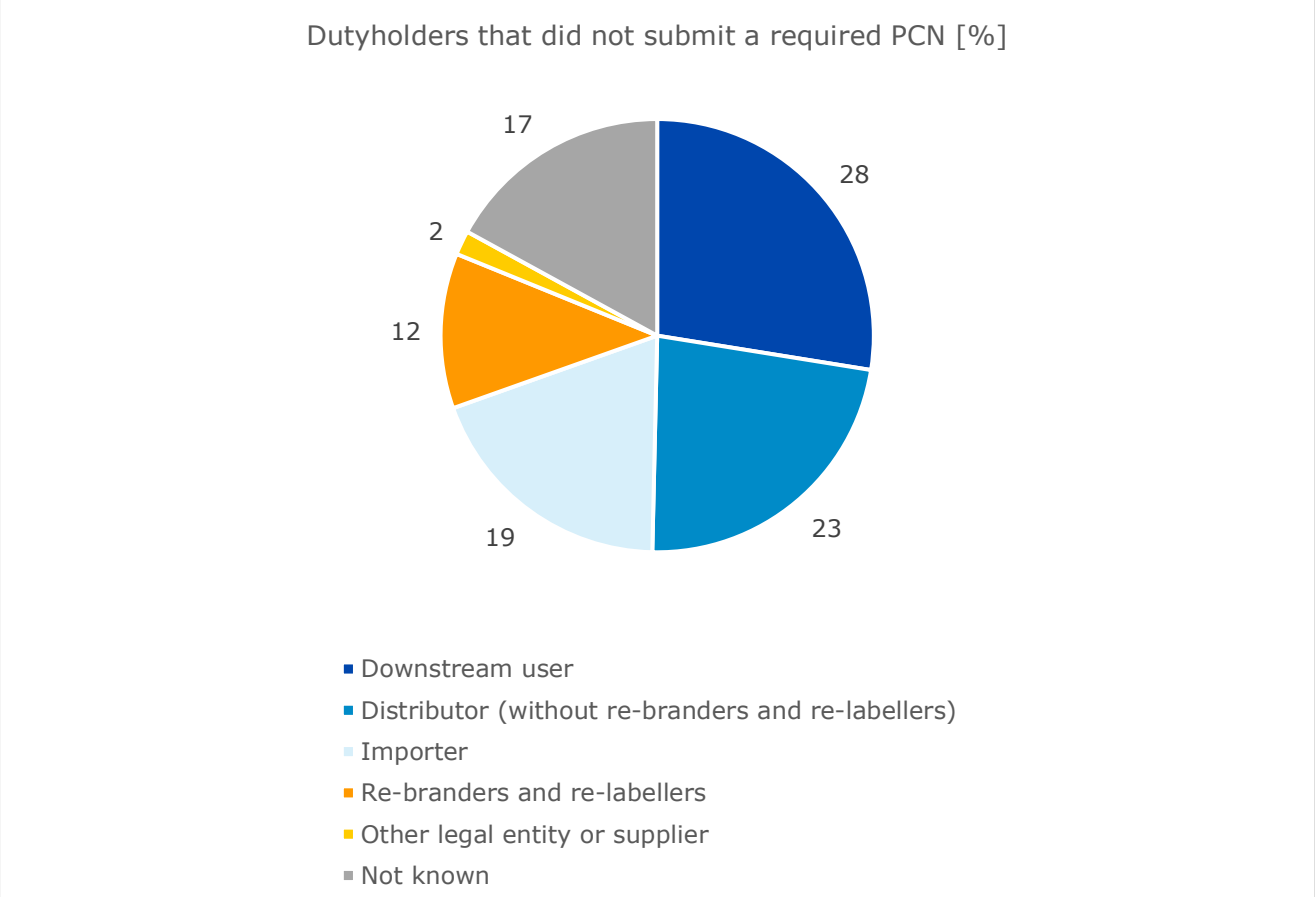

Figure 8: Duty holders that did not submit a required PCN [%]

3.3. Presence of UFI

To determine the extent to which European companies correctly apply the UFI requirements, it was first established for each inspected mixture whether a UFI was mandatory and whether it was actually present. Of all the 1597 inspected mixtures, a UFI was present in 84% of cases (1347).

Of the 1597 inspected mixtures, in 92% of cases (1477) the mixture required a UFI, in the remaining 8% this requirement did not apply.

Where the UFI was mandatory (1477 cases), it was actually present in 88% of the cases (on PCN, SDS or label), while in the other 12% of cases the UFI was missing even though it was mandatory, resulting in a non-conformity (see Figure 9).

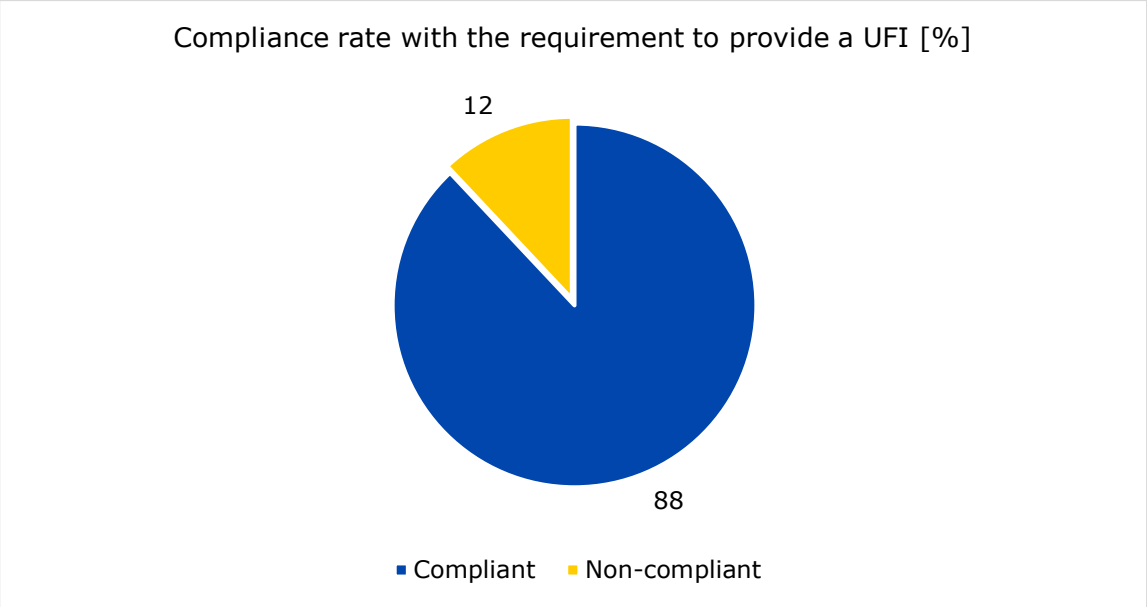

Figure 9: Compliance rate with the requirements to provide UFI [%]

In 1347 cases where a UFI was present (mandatory or voluntary), it had a valid[9] form in almost all cases (98%). Where a UFI was present, it was found in 92% of cases in the PCN, in 94% on the label, and in 69% in the SDS.

Presence of UFI on labels and SDS

In the cases where it was required[10] the UFI was missing from the product label in 15% of checked mixtures (out of 1203). Additionally, the UFI was missing from the Safety Data Sheet where required[11] in 3 cases (out of 12) which represents 25% non-compliance.

Use of one UFI for multiple PCNs

Of the 1295 cases where the UFI was present and mandatory, the inspected company indicated in 12% (155) inspections that the same UFI was also used in other PCNs, in 40% it was not used in other PCNs, and in 48% this was not checked.

In the 155 cases where the same UFI was also used in other PCNs, this concerned in 79% (122 cases) a mixture with identical composition and only on in 1% (2 cases) a mixture with a different composition (non-conformity). For 20% (31 cases) it was unknown whether the mixture in the other PCN had the same composition (see Figure 10). This could be the case if the inspector did not have access to the other PCN e.g. if the other PCN was made by another company.

[9] Validity of the UFI was checked by entering the UFI and clicking on the 'Validate' button on the ECHA website: https://ufi.echa.europa.eu/#/validate

[10] Total: UFI is mandatory and mixture use is not industrial

[11] Total: UFI is mandatory; only industrial use; UFI is required on SDS; UFI is not on the label

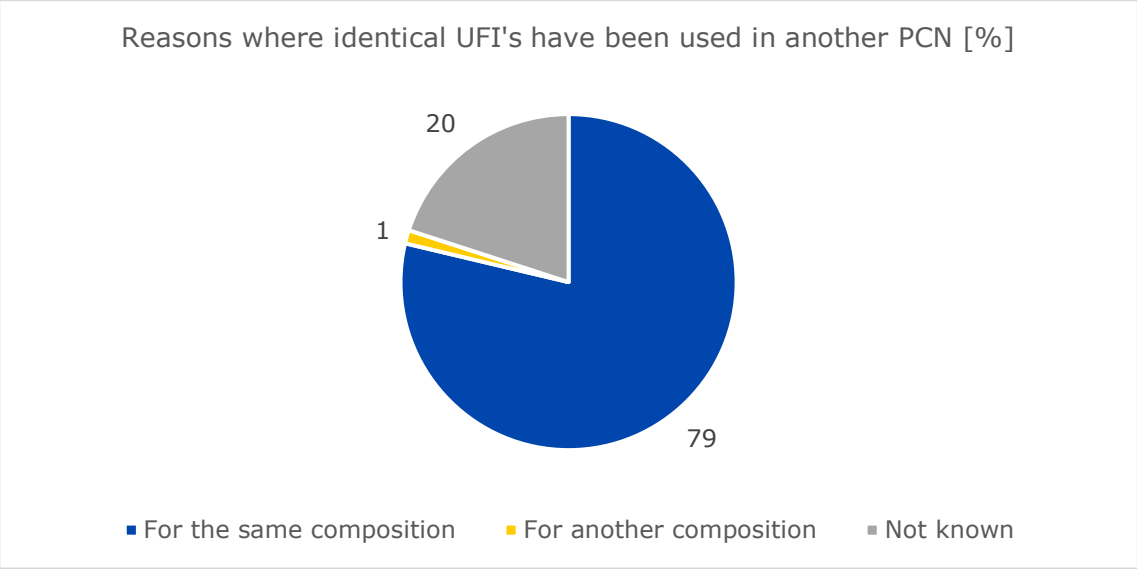

Figure 10: Cases where the UFI was also used in another PCN [%]

Consistency between UFI in PCN, label and SDS

Where the UFI was present in the notification and on the label (total 1105), in 99.5% of cases the UFI in the notification was identical to the UFI on the label. In 0.5% the UFI in the notification was non-identical to the UFI on the label.

Where the UFI was present in the notification and on the SDS (total 830), the UFI in the notification was identical to the UFI on the SDS in 98% of cases and non-identical in 2%.

UFI structure and its location on the label and SDS

Where the UFI was mandatory and present on the label (total 1230), the UFI was placed correctly according to Article 25 of the CLP Regulation in 97% of cases, while in 2% of cases the UFI on the label was not placed correctly. In remaining cases the UFI placement was not applicable.

Where the UFI was mandatory and present on the label (total 1230) it was structured correctly, according to CLP Annex VIII, in 98% of cases, while in 2% it was structured incorrectly. In remaining cases the UFI was not applicable on the label.

Where the UFI was mandatory and present in the SDS (total 856), it was placed in Section 1.1 of the SDS in 98% cases, while not present in Section 1.1 of the SDS in 2% of cases.

3.4. Consistency between notification, SDS and label

During the inspections of the mixtures, consistency between the notification to the Poison Centres was compared with the information on the label and in the safety data sheets (SDS).

In 250 reported mixtures, there was no UFI present, which meant that no further check of the label or the SDS was performed. For the other 1347 mixtures, inspectors checked both the labels and the SDS on consistency. Please note that a mixture can have inconsistencies in one or several of the applicable areas that were checked.

3.4.1. Labels

For the 1272 mixtures where notification was submitted (mandatory or voluntary), 87% inspected mixtures had consistent information on the label and in the notification and 13% (159) had inconsistent information.

For the total 159 cases that had inconsistent information between the label and the notification, the highest rate of inconsistencies, 76%, was related to the mixture labelling elements. The inconsistency regarding the trade name was 38% and between the volume on the label and the notified volumes was 29%. Please note that a mixture can have one or more reported inconsistencies (see Figure 11).

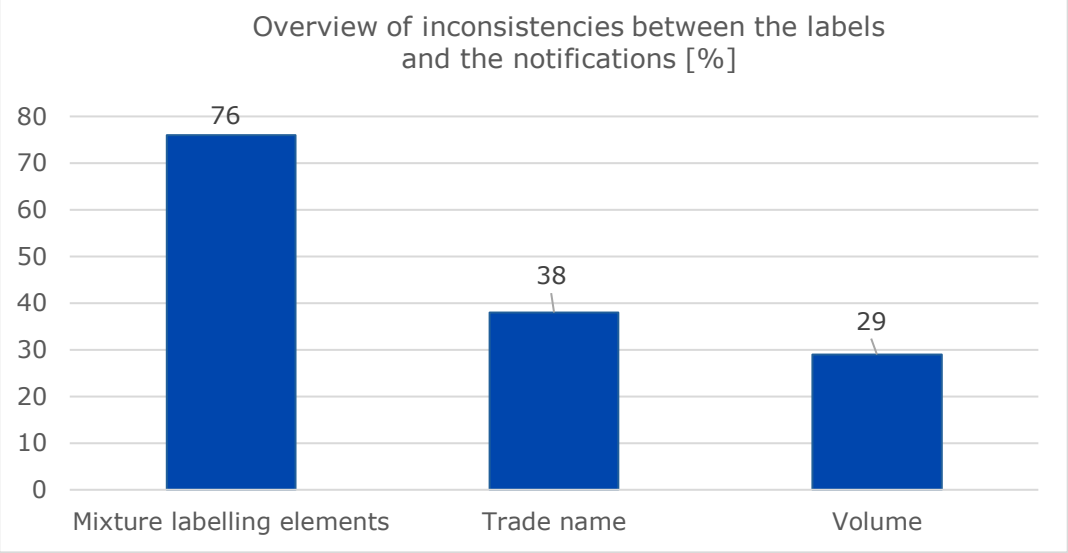

Figure 11. Overview of inconsistencies between the labels and the notifications [%] (159 non-compliant mixtures).

"Mixture labelling elements" comprised of several different elements, for example pictogram(s), signal word, hazard statements and precautionary statements.

3.4.2. Safety data sheets

For the 1272 mixtures where notification was submitted (mandatory or voluntary) 73% had consistent information between the SDS and the notification and 17%, where a SDS was required, had this information not consistent. For 9% of mixtures the SDS was not required, due to the fact that it was a consumer product.

For the total 221 mixtures, that did not have consistent information between the notification and the SDS, inconsistencies were found as indicated in Table 3.

Table 3: Overview of inconsistencies [%] between the safety data sheet and the notification for non-compliant mixtures (total 221). Please note that a mixture can have an inconsistency in one or more categories.

Categories	%
Mixture components	63
Toxicity (section 11 in SDS)	33
Mixture labelling	32
Mixture classification	26
pH	20
Colour	18
Mixture trade names and other names	16
Physical state	5

3.5. Non-compliance

The non-compliance data of subgroups and total number of cases concerned were always calculated taking into account the legal requirements for specific obligations (see Table 4). This approach was adopted to avoid potential distortions that might arise from including mixtures that were not subject to specific legal requirements. It should be noted that more than one type of non-compliance could be associated with a single mixture.

The most frequently observed non-compliance across all categories was the absence of a PCN notification. In 19% (out of 1432) mixtures identified as being subject to mandatory PCN obligations, companies had not submitted a PCN notification at all. Other recurring deficiencies included inconsistencies between the information provided in the PCN submission and that contained in the corresponding Safety Data Sheet (17%) as well as inconsistencies between the PCN and the product label (13%) in mixtures checked (out of 1272).

A second cluster of recurring issues was related to the UFI. A significant number of duty holders failed to fully comply with their obligations concerning the UFI. Specifically, the required UFI was missing from the product label in 15% of checked mixtures (out of 1203). The UFI was missing from the Safety Data Sheet (where required) in 3 cases (out of 12) representing 25% non-compliance. Although less frequent, further deficiencies were identified where the UFI was invalid in ~2% of the checked mixtures (out of 1342) or was used in ~1% (out of 155) of the cases for an entirely different mixture composition, thereby undermining the traceability and reliability objectives of the system.

Additionally, 141 cases of non-compliance were categorised as 'other' (out of 1432). These included cases when a mixture was not notified to another MS, REACH or CLP obligations not directly within the scope of the pilot project (such as incorrect classification, labelling or packaging, failure to use the national language), as well as issues falling under other regulatory frameworks, for example the Biocidal Products Regulation.

Table 4: Non-compliance with duties checked in the pilot project.

Type of non-compliance	Total of inspected mixtures	Number of non-compliant mixtures	%
No PCN submitted by the company	1432[12]	276	19%
Notification not consistent with SDS	1272[13]	221	17%
Notification not consistent with label	1272[14]	159	13%
UFI not present on label (where required)	1203[15]	178	15%
UFI not present on SDS (where required)	12[16]	3	25%
UFI not valid	1347[17]	21	~2%

[12] Total: PCN submitted as mandatory and PCN not submitted when required under CLP
[13] Total: PCN submitted (voluntary and mandatory). Voluntary PCN submission is included because if it is made, it should be consistent with SDS
[14] Total: PCN submitted (voluntary and mandatory). Voluntary PCN submission is included because if it is made, it should be consistent with label
[15] Note: please be aware of the issue Q&A 1727 (more detail in chapter 2.1. Introduction). Total: UFI is mandatory and mixture use is not industrial
[16] Total: UFI is mandatory; only industrial use; UFI is required on SDS; UFI is not on the label
[17] Total: UFI is present

Type of non-compliance	Total of inspected mixtures	Number of non-compliant mixtures	%
UFI used for another composition - when the UFI was submitted for more than one PCN	155[18]	2	~1%
Other	1432[19]	141	10%

3.6. Enforcement measures

This chapter outlines the enforcement measures taken following the identification of non-compliance. Different procedures and instruments may be available to the enforcement authorities in each Member State, meaning the type of action taken can vary depending on the national legal and administrative framework. The inspectors could apply more than one measure for a single mixture.

For reported non-compliant cases (656), a variety of measures were applied to reflect the varying severity of the issues. The most common response was written advice, issued in 447 cases, while verbal advice was far less frequent, being issued in only 99.

More formal enforcement actions were relatively rare. Administrative orders were issued in 72 cases, while fines were applied in 30 cases and criminal complaints in 29 cases. Additionally, 72 cases were reported as 'other' measures (e.g. forwarded to competent enforcement authorities) (see Table 5).

In a significant number of cases (222), follow-up actions were reported as still ongoing at the time of filling in the questionnaire. In 59 cases no enforcement actions were yet initiated at the time of filling the questionnaire.

Table 5. Overview of the enforcement measures taken by inspectors for 656 non-compliant cases (multiple answer are possible).

Enforcement measures	Number of actions taken	%
Written advice	447	68
Verbal advice	99	15
Administrative order	72	11
Other	72	11
Fine imposed	30	5
Criminal complaint / handling over to public prosecutor’s office	29	4

[18] Total: UFI is present and mandatory, the same UFI was also used in other PCNs - see chapter 3.3. of the report
[19] Total: PCN submitted as mandatory and PCN not submitted when required under CLP

4. Conclusions and recommendations

Based on the analysis of the data received from all participating countries, the following overall conclusions and recommendations can be drawn from the project.

4.1. Reflections and conclusions

Almost 2/3 of all EU/EEA countries participated in the project showing a high interest in the subject.

Article 45 of CLP specifies the use of information in the PCN for emergency health response and statistical analysis. It also says that information should not be used for other purposes which gives the impression that it does not give the right for NEAs to access the information that is notified to the Appointed Bodies or Poison Centres (ABs/PCs). For this reason, different ABs/PCs in the EU/EEA have different views on what data can be shared with NEAs. Requests from NEAs are often handled on a case-by-case basis by the ABs/PCs and only 43% of inspections were conducted in collaboration with ABs/PCs.

Based on the feedback from inspectors the participating MSs took different approaches when selecting mixtures and companies to be checked e.g. using a risk-based methodology or information from previous controls, working with Customs authorities, focusing on the products available on the market shelves, as well as random selection.

In this project 71% of the inspected mixtures came from SMEs. Based on the findings, the compliance rate was on a similar level for SMEs and the large companies.

The UFI code is a vital tool used by the Poison Centres to rapidly identify a mixture following an accidental poisoning. Inspectors found a compliance rate of 85% in relation to the placing of the UFI codes on labels where they were required. In 15 % of the checked mixtures, the duty holders do not have a good understanding of the general requirement that hazardous mixtures require a UFI code and how to correctly indicate the UFI code on the label. The overall compliance rate for the PCN submissions (where required) was 81%, meaning that 19% of the duty holders were not aware of the requirements of submitting information to the poison centres.

Inspectors found that for the cases where the label and the PCN were inconsistent (total 159), the largest rate of non-compliance (76%) was in the area of the mixture labelling elements. While inconsistencies were also found in the trade name (38%) and volume (29%) it needs to be considered that ‘mixture labelling elements’ contains more than one element to be checked, for example pictogram(s), signal word, hazard statements and precautionary statements. Therefore, it was to be expected that the most inconsistencies were identified in this area.

A number of inconsistencies observed in the information in the PCN and the SDS may be due to the possibility that information on mixture composition and hazardous properties may be managed in different systems or documents by the economic operators, and updates are not always made at the same time. In some cases, hazardous substances listed in Section 3.2 of the SDS might not have been included in the notification, and toxicological information from Section 11 of SDS may not have been provided in all required languages in the PCN. Such inconsistencies can reduce data coherence, flow of correct information in the supply chain and potential practical implications for Poison Centres to accurately advise in an emergency health response.

The results show also some non-compliance with the PCN obligations. The most frequent problem was the absence of a PCN notification, which was found in 19% of cases when PCN submission was mandatory. Additionally, the PCN notifications were not consistent with the SDS in 17% of cases and there was an absence of the UFI on the product label in 15% of cases. As a result, this indicates that some duty holders are not meeting their obligations and this reduces the effectiveness of an emergency response in case of a poisoning incident.

4.2. Recommendations

4.2.1. Recommendations to industry/associations.

1. Before purchasing a hazardous mixture, importers are advised to make a business agreement regarding the poison centre notification with the non-EU/EEA formulator to ensure compliance with requirements. The non-EU supplier may assist the importing duty holder with their legal obligations through an EU-based legal entity.

2. Industry associations are advised to raise awareness among importers, downstream users, and distributors on the requirements of Article 45 of CLP including the UFI on the label/SDS and in the notification.

3. It is advised to inform through all channels that the end of the transition period has passed, meaning that from 1 January 2025 all hazardous mixtures in scope of Article 45 should be notified according to the harmonized format and have the UFI on the label, including distributors (Updated ECHA Q&A 1727[20]).

4. Industry associations are advised to take part in/raise awareness (if relevant) to end-users about the UFI code for their mixtures[21].

4.2.2. Recommendations to the European Commission

1. It would improve enforceability if National Enforcement Authorities were granted more direct access to the PCN submitted to their country. This could be achieved by an amendment to Article 45 of the CLP Regulation (CARACAL document CA/86/2019).

2. Enable the possibility that enforcement authorities can at least have access to the submission report of the PCN, which could enhance the effectiveness of inspections.

3. Ensure that, where changes in legal interpretation occur, stakeholders are afforded a reasonable transitional period to ensure compliance (ECHA Q&A 1727).

4.2.3. Recommendations to the inspectors

1. It is recommended to check Article 45 of CLP requirements while conducting routine CLP inspections. While doing these inspections encourage dutyholders to keep their PCN data up to date. The information submitted as part of the PCN is used by e.g. Poison Centres to advise on emergency response measures in a case of exposure of end-users and therefore it is vital that the information in PCN is correct.

2. It will be beneficial that inspectors maintain close cooperation with Appointed Bodies and Poison Centres and participate in regular training sessions for adequate enforcement and consistent interpretation of CLP Article 45.

[20] It should be noted that when the project manual was written it was understood that distributors, in particular retailers, who received a hazardous mixture benefitting from the transitional period (ending 1 Jan 2025), and thus without a UFI affixed, could also place those mixtures on the market without a UFI on the label. During the operational phase of the pilot project, the Q&A was revised (04/06/2025) and the interpretation is now that all mixtures on the shelves of distributors can no longer be supplied further if a UFI is not affixed to their label, as they would not be compliant with CLP.

[21] For example it has been done by AISE Home - Cleanright

4.2.4. Recommendations to the Member States

1. Raise awareness within industry about the PCN requirements and specifically on UFI (ECHA Q&A 1727).

2. Member States to create the national procedures allowing the access for enforcement authorities to relevant PCN data and to guarantee the confidentiality of the data shared.

3. Make use of readily available translated posts and visuals made by ECHA to raise awareness to consumers about the UFI.

4.2.5. Recommendations to the ECHA Forum

1. If a REF project on PCN will be performed, it could be useful to collect information on the intended use of the product according to the EuPCS (European Product Categorisation System).

4.2.6. Recommendations to consumers

1. Become more familiar with information about hazardous mixtures and their labels. A good starting point is to visit ECHA's poison centre website Why the UFI matters for everybody - Poison Centres. Consumers may also raise awareness about the importance of UFIs by supporting the ECHA social media campaign (#UFImattersEU) in social media channels.

5. Annex

Annex I – Project Questionnaire

Forum Pilot project on enforcement of CLP notifications to Poison Centres Fill out a single questionnaire for one mixture inspected

Section 0: General information about the inspection

* 0.1. Participating country:	
* 0.2. Name of the authority:	This data is only for internal use.
* 0.3. E-mail address (inspector):	This data is only for internal use.
* 0.4. File reference	This data is only for internal use. NEA Internal reference number e.g., inspector No., case No. etc
* 0.5. The inspection is: ◯ On-site inspection ◯ Desktop inspection ◯ Combination of both	
* 0.6. Who was involved in the checks: ☐ NEAs ☐ Poison Centre ☐ Appointed Body	

Section 1 - General information about the company and the mixture checked - responsible for CLP notifications to Poison Centre

* **1.1.** Name of company: **1.2**. Trade name of mixture: **1.3.** Name of the contact person: **1.4.** Contact person's role:	This data is only for internal use.
* **1.5.** According to Commission Recommendation 2003/361/EC the company qualifies as: ◯ SME ◯ not SME	SME: <250 employees and ≤50 million euro annual turnover Small and Medium-sized Enterprises (SMEs) - ECHA (europa.eu)
* **1.6.** Has a PCN been submitted for this mixture? ◯ Yes, as mandatory notification ◯ Yes, as voluntary notification ◯ No, no legal requirement under CLP ◯ No, (non-compliance) subject to legal requirement under CLP	This pilot project checks CLP notifications. If the answer is 'Yes', then question 1.7.1. needs to be answered. If the answer is 'No, (non-compliance)…', then question 1.7.2. needs to be answered.

* **1.7.1.** Who submitted PCN for this mixture? ◯ Downstream user ◯ Importer ◯ Re-branders and re-labellers ◯ Distributor (without re-branders and re-labellers) ◯ Other legal entity or supplier	Art. 2(19) of CLP Art. 2(17) of CLP
* **1.7.2.** Who should have submitted PCN for this mixture? ◯ Downstream user ◯ Importer ◯ Re-branders and re-labellers ◯ Distributor (without re-branders and re-labellers) ◯ Not known	Art. 2(19) of CLP Art. 2(17) of CLP
* **1.8.** What is the mixture use type? ☐ consumer ☐ professional ☐ industrial	
* **1.9.** Where is the mixture formulated? ○ Within EEA ○ Outside the EEA (Please indicate country in 1.9.1.) ○ Not known **1.9.1.** Please specify the country here:	

Section 2 – Details regarding the UFI

* **2.1.** Is the UFI present? ○ Yes 2.1.1. If yes, then is present in: ☐ PCN ☐ label ☐ SDS ○ No	If the answer is 'No' then only question 2.2. needs to be answered but not the rest questions in Section 2. If the answer is 'No' then Section 3 does not need to be answered.
* **2.2.** Is the UFI mandatory? ◯ Yes ◯ No	If the answer is 'Yes' only then all questions in Section 2 need to be answer.
* **2.3.** Was the UFI valid? ◯ Yes ◯ No	See chapter 5.2.2. Validity of the UFI can be checked entering the UFI and clicking on the 'Validate' button on the ECHA website: https://ufi.echa.europa.eu/#/validate
* **2.4.** How was the UFI generated? ◯ UFI-generator ◯ algorithm in company software ◯ obtained by a third company ◯ not checked	

* **2.5**. Was the UFI used also in another PCN? ◯ Yes ◯ No ◯ Not checked * **2.5.1.** If yes, ◯ for the same composition ◯ for another composition (non-compliance) ◯ not known (e.g. used by another company/ies)	See 'Quality rules' in the chapter 5.2.4.
* **2.6.** Is the UFI identical to the notification? ◯ Yes If yes, is identical to this one: ☐ on the label ☐ on the SDS ◯ No (infringement) ◯ Not applicable	
* **2.7.** Is the UFI placed correctly on the label? ◯ Yes ◯ No ◯ Not applicable (e.g. industrial product)	According to requirements the UFI should be placed on the inner package together with the other label elements or on the outer package with the other label elements, if the inner package is in such a shape or so small that it is impossible to affix the UFI on it.
* **2.8.** Is the UFI structured according to CLP Annex VIII on the label? ◯ Yes ◯ No (infringement) ◯ Not applicable (e.g. industrial product)	On the label 'UFI:' should precede 16 digit alphanumeric code with a dash between every 4 characters.
* **2.9.** Is the UFI indicated in the subsection 1.1 of the SDS? ◯ Yes ◯ No ◯ UFI not required in SDS	With the exception of mixtures supplied unpackaged, there is no default obligation to place the UFI in the SDS for hazardous mixtures, but it can always be included voluntarily. In any case, if the UFI is included in the SDS, it must be provided in Section 1.1.

Section 3 – Consistency between notification, SDS and label

* **3.1.** Is information about the mixture in PCN consistent with the label? ◯ Yes ◯ No If **no**, please select relevant areas that are not consistent: ☐ Trade name ☐ Mixture labelling elements ☐ Volume	Trade name according to Art. 18.3.a. CLP Mixture labelling elements and volume according to Art. 17 CLP. Section 3 does not need to be answered if the answer for question 2.1 is 'No'.

* **3.2.** Is information about the mixture in PCN consistent with the SDS? ◯ Yes ◯ No ◯ SDS not required (consumer product) If **no**, please select the relevant areas that are not consistent: ☐ Mixture trade names and other names ☐ Mixture components ☐ Mixture classification ☐ Mixture labelling ☐ pH ☐ Colour ☐ Physical state ☐ Toxicity (section 11 in SDS)	According to Art. 31 and Annex II of REACH.

Section 4 – Summary/enforcement actions/enforcement measures taken

* **4.1.** Have non-compliances been observed? ◯ Yes ◯ No * If **yes,** please choose relevant: ☐ No PCN submitted by the company ☐ UFI not valid ☐ UFI not placed on SDS (where required) ☐ UFI not placed on label (where required) ☐ notification not consistent with SDS ☐ notification not consistent with label ☐ UFI used for another composition ☐ other: 4.1.1. If **other**, please specify here:	
* **4.2.** Which type of enforcement action were initiated when non-compliance was identified? (Please choose relevant.) ☐ No enforcement actions were initiated yet ☐ Verbal advice ☐ Written advice ☐ Administrative order ☐ Fine imposed ☐ Criminal complaint / handing over to public prosecutor's office ☐ Other: 4.2.1. Please specify your answer other ☐ Follow up activities still on-going	

Section 5 – Additional comments

5. Informal comments Please fill this section if you would like to inform on obstacles overcome, lessons learned, need for clarification/ harmonisation:

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