

Q&A

24 March 2022

PCN Notification and its implication on SDS in EU and UK

#	Questions	Answers
1.	Is it mandatory to write the UFI in the SDS of all kinds of products or only in the MiM?	UFI is mandatory for the mixtures which are classified for physical hazard and health hazard. Additionally, if MiM is classified then UFI becomes mandatory. It can also be referred to as the use of the mixtures.
2.	If an American company is selling their products in Europe and in the SDS has the toxicology number of an American center that has 24h attention, must the company still do the PCN notification via a European legal entity?	PCN is mandatory as per CLP regulation requirements and it's not related to the private 24hrs emergency response.
3.	Concerning UK PCN: Is it possible (as a company in the EU) to notify products in GB without an OR or legal entity there?	UK PCN will need the UK based entities to do the notification on behalf of non-UK entities
4.	Concerning PCN for Northern Ireland: As an EU company without a legal entity in NI or GB, is it possible to send a PCN for NI to NPIS? Do they accept that?	No, for NI, EU PCN will be applicable but for GB PCN, you need to have a GB based entity to do the notification as per GB CLP regulation.
5.	Is there an online portal or such at NPIS for notifications (whether for EU-PCN for NI, or UK PCN)?	No, there is no online portal with NPIS. Notifications are accepted via email.
6.	Re Northern Ireland: Is it correct that NI is covered by both notification systems (i.e. EU PCN and UK PCN)? So when placing products on the Northern Irish market, do products have to be notified twice to cover both regulations?	Yes, NI is covered by both notifications and the same file can be shared with ECHA as well as NPIS. But for GB notification, you may need GB based entity to do the notification.
7.	Hi everyone! Thank you for the valuable information. I just wanted to double-check on the UK/NI topic: if the product is marketed in the whole territory, does the notification to NPIS instantly cover NI? Or do we have to somehow specify to NPIS that the notification should cover NI as well? Thanks in advance!	NI is covered by both notifications and the same file can be shared with ECHA as well as NPIS. But for GB notification, you may need GB based entity to do the notification.
8.	For accidental measure, the Individual packaging size is mandatory. Does it also depend on the tonnage of the chemical being used or stored?	Within PCN, there is no tonnage obligation for doing the notification and it is mandatory depending on the classification of the substance.
9.	How can I find the UFI for my product? is there any portal?	You can generate the UFI for your mixture from the Poison Centre portal, but it will be valid after it's submitted to the authorities. But there is no site where these numbers will be disseminated.



10.	Is the SDS regulated for PCN? Does it also require a specific code?	SDS has an impact on PCN requirements and UFI needs to be entered into section 1 of the SDS. That is the only change that we can see. Also, all information has to be consistent with the information submitted within the PCN notification specific to section 11 information.
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