

Q&A

Ensure Consistency and completeness of the SDSs New requirements from January 2023

No.	Questions	Answers
1	How to design UFI number?	The Unique formula identifier (UFI) is a code that will be required on the label of your products that contain a hazardous mixture. UFI are not designed. They are generated via an UFI Generator. GPC can help you to prepare UFI code.
2	Which products have a UFI code?	Mixture products have UFI numbers. UFI is needed in both SDS and label but if your product does not have a packaging system or if your product has only industrial use then you have UFI requirements on only SDS otherwise you can put the UFI on SDS as well as label. GPC can help you to prepare UFI code.
3	What about TR? Is the new regulation applicable for TR?	No, the new regulation is only applicable to EU.
4	If we don't fall under nanoform category still we have to mention Nanoform heading in 1, 3 & 9 sections of the SDS mentioning, Nanoform: Not applicable?	No, there is no need to add any information for Nanoform if the substance/mixture does not fall under the nanoform category.
5	What about Microorganisms, do they receive an UFI as well?	No, it is applicable only for chemicals (Mixture products)
6	What about UK? Will this Annex II update apply to UK?	No, it does not apply on UK.
7	What are the penalties for invalid SDSs being circulated?	The refusal to communicate information (SDS) or provision of false information to the other actors in the chain may cause penal actions.

8	Is the UFI number a recommended or obligatory change and under which paragraph should that be implemented?	PCN is obligatory for Hazardous Mixtures placed in the EU market according to Article 45 of CLP. UFI Number is assigned to the mixture when PCN notification is done.
9	How is the change in SDS legislation followed up by local and national authorities?	All SDSs will be checked for new updates according to the regulation.
10	What are eSDS?	eSDSs means extended Safety Data Sheets which also cover exposure to a hazardous substance. eSDS includes information on different exposure scenarios.
11	Since endocrine-disrupting properties testing will require time then how the timeframe obligations will be met?	ECHA has released the list of Endocrine Disrupting substances. If your Substance does not fall under this list but is suspected to be ED, then you also need to specify. But if it's not yet clear whether the substance is ED or not, then there's no need to indicate the same in SDS
12	Do GHS includes UFI or it is for EU region only?	It is for EU region only.
13	What will be pictogram if CLP and GHS pictogram does not match for substance?	CLP and GHS pictograms always match with each other
14	We are mfg. of the cosmetic ingredients, and our customer was also asking for the updating of SDS as per revised guideline of ECHA. So it is mandatory to update it?	SDS preparation for Cosmetic products is exempted as per EU.
15	In mixtures if one substance is contributing to Haz and not the other, is UFI required?	UFI is needed in both SDS and label but if your product does not have a packaging system or if your product has only industrial use then you have UFI requirements on only SDS otherwise you can put the UFI on SDS as well as label.
16	The requirement of new SDS applies to all products or only to those falling under PCN?	SDS applies to all products. UFI is needed in both SDS and label but if your product does not have a packaging system or if your product has only industrial use then you have UFI requirements on only SDS otherwise you can put the UFI on SDS as well as label.

		The PCN deadline for mixture is of industrial use is 1 st January 2024.
17	Do polymers fall under UFI? What kind of hazardous substance falls under UFI? SVHCs?	No, PCN is not necessary for polymers.
18	How to correlate HAZARD STATEMENT WITH PRECAUTIONARY STATEMENT	Hazard Statements are already assigned with relevant Precautionary statements according to CLP.
19	How does the GHS-SDS and EU-SDS differ? Which sections should be harmonized? UFI will be included in GHS-labels?	GHS is a guideline which is adopted by different countries. All the SDS are according to the GHS guideline. The only difference is regarding the GHS version which is adopted by a particular country. All the sections should be harmonized according to GHS. Yes, UFI will be included in labels as well.
20	Requirements for nanomaterials: My raw material on the ECHA website is defined as nanoform, but it also comes in powder form. My supplier at SDS did not specify whether the product is a nanoform or powder. The raw material is a coloring ingredient in my final product (mixture; liquid). Do I need to disclose this ingredient in Section 3 in this situation? The raw material is not classified.	First, you need to confirm whether the raw material is in Powder form or Nanoform from your supplier. If the raw material falls under Nanoform, it needs to be specified in section 3 of SDS.