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UFI ("Unique Formula Identifier") – New regulation coming up

Dear Sir / Madam

Poison centers play an important role in ensuring the safe use of chemicals and formulating preventive and curative measures in case of poisoning incidents. They provide medical advice to general consumers and physicians on health emergencies, arising from exposure to hazardous chemicals or to other toxic agents.

On average, poison centers in the EU answer 600'000 calls for support each year. Roughly, half of the calls are related to accidental exposures involving children. Under Article 45 of the CLP Regulation, economic operators placing certain hazardous mixtures on the market have to provide information to national appointed bodies. The information is needed by the poison centers. A new website has been implemented by the European Chemicals Agency, in order to facilitate the implementation of new regulations on harmonized information by companies, appointed bodies and poison centers.

The legal background can be found in CLP Article 45(4): *as per 20 January 2012 the Commission shall carry out a review to assess the possibility of harmonizing the information referred to in paragraph 1, including establishing a format for the submission of information by importers and downstream users to appointed bodies.*

Furthermore, in the commission Regulation (EU) 2017/542 on harmonized information relating to emergency health response/CLP Annex VIII is stated:

- Obligation for importers and downstream users placing hazardous mixtures on the market to notify national appointed bodies
- Phased deadlines by 1 January
    - 2020 for consumer use
    - 2021 for professional use
    - 2024 for industrial use
    - 2025 for products having already been submitted before the three deadlines above (marks end of transition period)

Practically this means, that all mixtures classified as hazardous for human health or physical hazard have to be equipped with a UFI ("Unique Formula Identifier"). The UFI is a unique code, which is integrated in the SDS and has to be printed on the label of the product. It will create an unambiguous link between a mixture placed on the market and the information on that specific mixture submitted to poison centers, so that the chemical formulation of the product can be precisely and rapidly identified. A precise identification is necessary to provide appropriate curative measures in the case of an emergency call. This requirement applies throughout the European Economic Area, which comprises 28 Member States of the EU and Norway, Iceland and Liechtenstein.
In Switzerland the Chemicals Ordinance (Chemikalienverordnung (ChemV)) was changed. The UFI must be on the packaging for hazardous products that are sold to the private public. The transition period is until 2021. UFI will be part of the product registration as well. For professional/industrial use it is still in discussion.

SAP BCS will assume responsibility for the generation of the UFI-Code and also make sure that all relevant information is passed on to ECHA. Currently SAP BCS is evaluating which Würth products will fall under the new CLP Annex VIII and also if they are classified as Consumer or Professional Use within the SDS Portal. This is very important since the deadline for consumer use items is set an earlier date than the one for professional use. Items, which have already been registered on a local level in the past, only have to be equipped with a UFI as soon as there is a relevant change in classification of the product. All new items have to be equipped with a UFI in accordance as per 2020 or 2021, depending on its defined use.

Even though SAP BCS will assume responsibility for the major task within this project, there is also some work to do on the Würth side. All affected items, will have to be classified according to their main use and that has to be taken care of by the Product Manager. For group items, the task will be assumed by the Product Managers of AW KG and Würth International and for the local items the Product Managers of the respective subsidiary will have to submit the information to SAP BCS. For this purpose there will, midterm, be a change in the SDS Portal and the interface for applications for new products. When a poison center receives a call there are three different identifiers on the label which they take into account before being able to assist the person calling: UFI, Product Name, Product Number. This means that we must make sure that we have the same product number and product name in the SDS Portal as we have on the label.

In order to avoid additional work on all sides, we kindly ask you to take the following actions.

Make sure:

- that you do not have any active items in the SDS Portal which are actually no longer in your range.
- that all chemical items, which you place on the market under the Würth brand, are applied for in the SDS Portal.
- that the product name mentioned on your product label is the same as the name mentioned on the SDS
- that all active items in the SDS Portal are correctly classified as Consumer or Professional Use

Please let us have feedback as soon as you have completed these tasks. If possible, we urge you to do so until May 31st 2019.

As soon as we have the evaluations regarding the affected products available from SAP BCS, we will inform you about the next steps to be taken.

If you have questions, please do not hesitate to contact us at any time.

Kind regards

Würth International AG

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