Swiss Confederation

12 January 2021

Information on obtaining a Unique Formula Identifier (UFI) for chemical products

With the new Unique Formula Identifier (UFI), the composition of chemicals, biocides or fertilisers can be found quickly in an emergency.

This is important so that the doctors at Tox Info Suisse, the Swiss poison centre can reliably identify products and thus know their composition. This enables them to recommend the appropriate measures upon request.

In Switzerland, the UFI will be introduced for preparations, biocidal products and fertilisers that are classified as hazardous on the basis of their health and physical effects:

- From 1.1.2022: preparations, biocidal products and fertilisers newly placed on the market which are intended for private users;
- From 1.1.2022: preparations, biocidal products and fertilisers that already are labelled with a UFI. In particular, products imported from the EEA fall into this category. This ensures that Tox Info Suisse can identify such products quickly and reliably in an emergency.
- From 1.1.2026: all other preparations, biocidal products and fertilisers that are classified as hazardous on the basis of their health and physical effects.

The UFI has to be reported in the product register for chemicals as well as indicated on the products. The requirements for affixing of the UFI in Switzerland comply with the requirements of Annex VIII of the EU CLP Regulation, so that as far as possible no barriers to trade arise.

A computer application, developed by the EU, enables a UFI code to be generated (alphanumeric type xxxx-xxxx-xxxx). In principle, three elements are required to generate a unique code: country in which the company is located, company VAT number and an identification number of the preparation (art. 15a ChemO).

It should be noted that in Switzerland all preparations that meet the criteria for the compilation of a safety data sheet¹ are subject to reporting requirements. The scope of the data to be reported in Switzerland differs from that in the EU.

For preparations that have already been reported, it is sufficient to complete the UFI in the electronic reporting tool of the notification authority for chemicals ($\underline{www.rpc.admin.ch}$), update other information in the report if necessary and then re-qualify the report by sending it. For biocidal products authorised under the transitional provisions (A_N and A_C), the UFI can also be completed by the authorisation holder in the RPC. Afterwards, the notification authority Chemicals must be informed of the change by email ($\underline{cheminfo@bag.admin.ch}$), stating

¹ See Guidance-document «<u>Das Sicherheitsdatenblatt in der Schweiz</u> » available under <u>https://www.an-meldestelle.admin.ch/chem/de/home/themen/recht-wegleitungen/wegleitungen-interpretationshilfen.html</u>

the authorisation number. This change is free of charge. The changes can also be made using the mass registration tool.

For applications for authorisation of biocidal products submitted under the procedure harmonised with the EU, the UFI and the necessary information according to Annex VIII of the EU CLP Regulation must be submitted to the notification authority with the application or at least 30 days before the first placing on the market. In the case of existing authorisations under the EU harmonised procedure, the authorisation holder can notify the notification authority of the chemicals via R4BP of the UFI on the respective case, including the asset number. In the case of biocidal product families according to the EU harmonised procedure, the UFIs must be indicated for all asset numbers of the members of the biocidal product family. This change is free of charge.

The ECHA notification tool does not accept UFIs that are not issued with the VAT number of a Member State of the European Economic Area (EEA). This means that a UFI created with the Swiss generator is not accepted in the EEA. In the interests of a pragmatic approach, the Swiss authorities therefore recommend the following:

1. Preparations, biocidal products and fertilisers imported into Switzerland from a country of the EEA, and already bearing a UFI

The UFI obtained by a manufacturer located in the EEA and identified on the preparation, the biocidal product or th fertiliser is also valid in Switzerland and must be used by the Swiss importer when communicating the preparation to the product register RPC or in the application for biocidal products and fertilisers.

2. Products manufactured in Switzerland or imported into Switzerland from a non-EEA country and intended, at least in part, to be exported to an EEA country

For the part of the production exported to the EEA the UFI (according to ECHA) must be obtained with the UFI generator of ECHA by or in the name of the importer located in the EEA. This UFI number may also be used for the product of the same composition commercialised in Switzerland as well as for communication with the product register for chemicals RPC in case of preparations or in the application for biocidal products and fertilisers.

The European importer is responsible for communicating with the poison centre(s) in the EEA, but may delegate this responsibility to the manufacturer located outside the EEA on condition that the UFI corresponds to the importer (country and VAT number of the importer).

3. Products initially intended solely for the Swiss market

An UFI for preparations, biocidal products and fertilisers, which are placed on the market in Switzerland, but not in the EEA, can be generated on UFI (Unique Formula Identifier) using the Swiss VAT number. The UFI has to be indicated on the product and to be reported into the product register for chemicals RPC in case of preparations or in the application for biocidal products and fertilisers.

UFI and the safety data sheet

The indication of the UFI in the safety data sheet is normally not mandatory, but highly recommended. The UFI must be stated in section 1.1 "Product identifier" of the safety data sheet.