

What is a UFI?

Using the UFI for your products and mixtures

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Submission of harmonised information according to Annex VIII to the CLP

- Full chemical composition
- Toxicological information
- Label elements
- Product category (from EuPCS)
- Details of product (trade name...)
- Additional details (packaging, colour...)
- Unique Formula Identifier (UFI)





UFI - another element of information, but it must be

 In the submission with all the Annex VIII information requirements

AND

Clearly visible on the product







Why is a UFI needed?

- Problematic identification of products 40% of calls.
- More accurate advice & avoid unnecessary over precautious treatment.
- -> UFI concept to assist!







What does a UFI look like?

- Code with a defined format
 - 16 alpha-numerical characters
 - Upper case letters
 - Separated by hyphen into 4 blocks
 - Avoids ambiguous letters e.g. 'O', 'I', 'L', 'B', and 'Z'
 - Checksum character

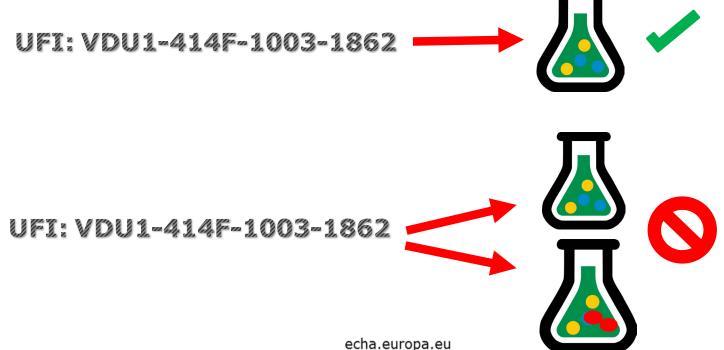
VDU1-414F-1003-1862





What is a UFI assigned to?

 General rule is that a UFI is assigned to 1 (and only 1) mixture composition.







But the UFI is flexible!

 1 mixture composition may have multiple UFIs assigned to it.

UFI: VDU1-414F-1003-1862 UFI: X800-U0RP-S009-1KM3 UFI: 8XD3-W0EC-T00G-ATYX





How does the UFI work?

 UFI works to link a specific product on the market to the submitted mixture information.



- Read from the label of a product in an emergency to poison centre operator.
- It works to protect confidential business information.





UFI for poison centres

 UFI used with other information e.g. trade name or product category.



- Rapidly identify the exact product involved in an incident.
- Distinguish between two mixtures with the same trade name.
- Confirm that the product was correctly identified.







UFI for industry

- UFI can be safely used in the supply chain to protect confidential business information of mixture composition (for MiMs).
 - > instead of disclosing the full composition.
- In order to do this the UFI (& other information)
 must be submitted to keep the integrity of the link
 for poison centres.





Including the UFI on the label

- Clearly and visibly printed on, or affixed to the label*.
- Indelibly marked.
- Preceded by the acronym 'UFI:'.
- Adapt existing/design new labels for individual products.
- * It is possible to include the UFI also on the packaging provided it is in close proximity to other labelling elements.







Derogations and considerations

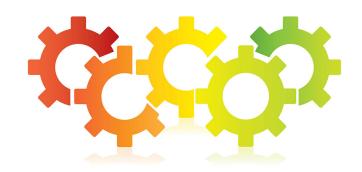
- Derogations
 - Industrial mixtures SDS (section 1.1)
 - Mixtures not packaged SDS (section 1.1)
- Considerations
 - Packaging layers, small packages, unit dose packaging
 - Transport packaging
 - Fold-out labels, tie-on tags...
- Guidance on labelling & packaging

https://echa.europa.eu/guidance-documents/guidance-on-clp





Creating a UFI



- Industry obligation
- Online UFI Generator
 - Final version online
- Developer's manual (UFI algorithm)
 - To develop own 'Generator' in own system
 - Algorithm public so industry generate own UFIs

https://poisoncentres.echa.europa.eu/







What makes UFI so unique?

Creating a 'unique formula identifier' requires:



- Unique VAT avoid duplication of UFIs generated by different companies resulting from same formulation number.
- 'VAT 1' & 'formNb 1' will always give 'UFI 1'

^{*} formulation number & value added tax number





What the UFI itself tells you

- After a series of transformations, the UFI can only retrieve:
 - a VAT number
 - a formulation number (formNb)

VDU1-414F-1003-1862 -> 'VAT number' & 'formNb'

Not possible to retrieve information on the composition of the mixture.





More about the VAT!

- VAT is used only to ensure unique code.
- No cross checks made on VAT and submitter.
- NOT about tracing a product or company.
- Possible VAT number used can be different from the submitter
 - e.g. private labellers, toll formulators, subsidiary vs. mother company, consultants, ...
- No gain from misusing another company's VAT







Timelines

- UFI placement on the label should coincide with a submission to avoid 'empty' UFIs.
- For new mixtures not on the market, the UFI
 obligations need to be adhered to according to the
 use type of the mixture:
 - from 1 Jan 2020/2021/2024 for consumer, professional, or industrial use respectively.
- For mixtures already notified transition period ends 1 Jan 2025 (unless change made).





To summarise

- UFI generation is industry obligation.
- On the label (or SDS) and in the submission
- UFI submitted with all information (Annex VIII)
- UFI only meaningful once submitted
- The UFI is a link the code itself does not reveal any compositional information
- UFI is unique per mixture composition but also flexible.
- Labelling requires planning start now!



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