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
  o 16 alpha-numerical characters
  o Upper case letters
  o Separated by hyphen into 4 blocks
  o Avoids ambiguous letters e.g. ‘O’, ‘I’, ‘L’, ‘B’, and ‘Z’
  o 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
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:
  - Formulation specific; not unique
  - Company specific; unique and (generally) not confidential

- ‘formNb*’ & ‘VAT* number’

- 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!
Thank you!

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