



THIS WEEK IN HELPDESK

UFI in the SDS

August 2020

This is what companies have been asking the Poison Centre Team this week about the UFI in the Safety Data Sheet (SDS).



Image credit: David Mark

When and where is the UFI required in the SDS?

With the exception of mixtures supplied unpackaged, there is no default obligation to place the UFI in the SDS for hazardous mixtures, but it can always be included voluntarily. In any case, if the UFI is included in the SDS, it must be provided in Section 1.1.

When an unpackaged mixture does not require an SDS

When an SDS is not required for unpackaged hazardous mixtures, e.g. for supply to the general public, the UFI needs to be provided in the copy of the label elements in accordance with Article 17 of CLP. The Guidance on Annex VIII and the Guidance on Labelling and Packaging suggest possible options (e.g. attachment to the delivery note or on the invoice or bill) – see here for more <https://echa.europa.eu/guidance-documents/guidance-on-clp>.

What about industrial use mixtures?

For a hazardous mixture used at industrial sites, the UFI may optionally be indicated in Section 1.1 of the SDS instead of on the label (or both if preferred).

Are multiple UFIs allowed in the SDS?

It is possible but not generally recommended. When more than one UFI is in use for the same mixture, it is recommended to include only one of the UFIs in the SDS. Similarly, it is not recommended to list more than one UFI in an SDS which covers multiple mixtures (e.g. when the concentration ranges are within certain limits and not changing the mixture classification).

If multiple UFIs are included in the SDS, then the supplier must clearly indicate which UFI corresponds to which mixture. In any case, only UFI(s) notified to the relevant appointed body can be included in the SDS.

Same SDS, different Member States?

When the same SDS is used in different Member States, it is recommended to use the same UFI for the notifications in each of the Member States. UFI(s) not notified in a Member State should not be used in an SDS supplied in that Member State.