

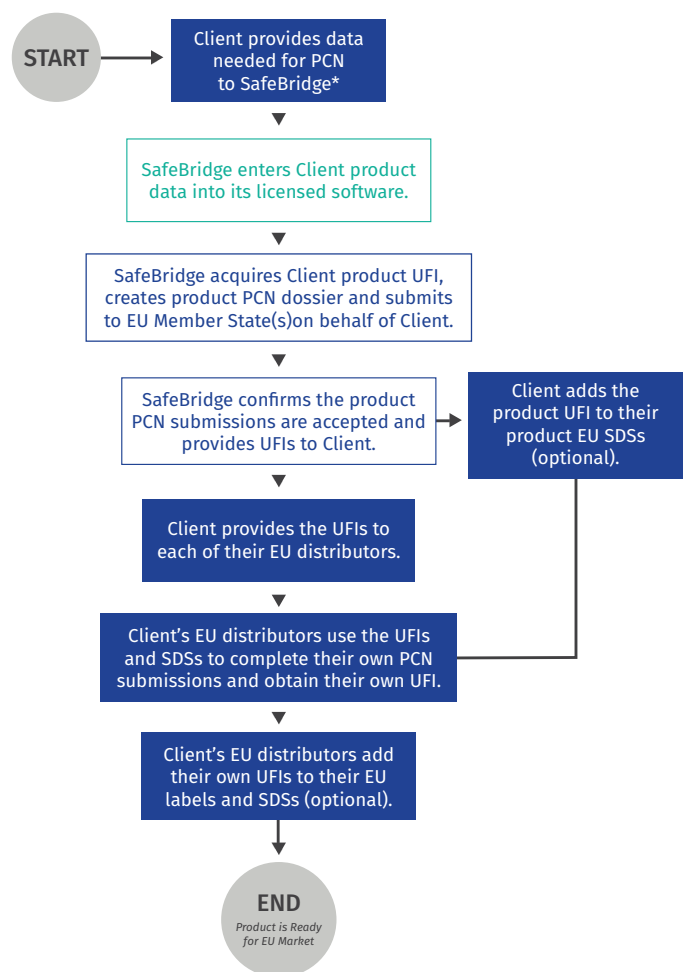
## Chemical Export to the EU: Requirement for Poison Center Notification (PCN)

Under Regulation (EC) No 1272/2008, Classification, Labeling and Packing of Substances (CLP), EU importers and distributors must complete poison center notifications for their covered products in accordance with Annex VIII. To obtain a **Unique Formula Identifier (UFI)** and complete the **Poison Center Notification (PCN)** for their imported products, they must obtain either the 100% composition of the product or their Supplier's UFI from the Supplier's submission to the European Chemicals Agency (ECHA) or EU Member States.

By utilizing a Third-Party EU PCN submitter, non-EU suppliers to the EU can avoid sharing their product compositions with their EU importers and distributors by obtaining and providing product UFIs instead.

Trinity Consultants - SafeBridge® Regulatory & Life Sciences Group supports non-EU clients by completing the PCN process, thereby protecting trade secrets.

### Third-Party Process for Obtaining UFI for EU Market



#### \* Data Required:

- ▶ Use type (end use) – consumer, professional, or industrial. Note this is the final use of the product – a mixture that is imported to be formulated into another mixture that is then sold to the consumer market or professional markets would be considered a consumer/professional product, not industrial, due to the final use market placement.
  - **Mixture for consumer use** means a mixture intended to be used by consumers (e.g., 'Artists' craft and hobby paints');
  - **Mixture for professional use** means a mixture intended to be used by professional users but not at industrial sites (e.g., 'Decorative paints');
  - **Mixture for industrial use** means a mixture intended to be used at industrial sites only (e.g., Automotive coatings).
- ▶ Use of the product (solvent, lubricant, etc.)
- ▶ Classification of the product and label elements
- ▶ 100% composition, CAS #s, and percentages (cannot include trade secret components)
- ▶ Toxicological information
- ▶ Physical information (pH, flash point, boiling point, KV, color, odor, physical state (solid/liquid/gas))
- ▶ Packaging information – type (tube, bottle, etc.), size

For assistance with obtaining UFIs, completing PCN dossiers or submissions, or related import/export support, contact us in California at 650.961.4820 or in New York at 212.727.0717.