

Poison centre notifications

How can harmonisation be achieved?



Riku Rinta-Jouppi,
partner and head of global compliance
at REACHLaw

The rationale for harmonising poison centre notifications within the EU single market is compelling. Around 600,000 calls are made each year to member state national poison centres. As chemical products move freely across national borders, life-saving toxicological product information should, in theory, “follow the product”. This information should be available to a caller and emergency responders regardless of which poison centre they are contacting or community language they might be speaking in.

In practice, this is not always the case. Under Article 45 of CLP, each member state is legally obliged to appoint a body to receive poison centre notifications. However, there are still some that have not done so or are providing only a generic email contact, without a proper notification system for industry to comply with the specific national information requirements.

As it has been up to each member state to make their own arrangements for contacting poison centres, it is often difficult to find the right contact number in an emergency. And such essential contact information is frequently only available in the national language and therefore difficult for foreigners, for example, to access. Furthermore, it has been estimated that in up to 40% of calls, poison centres were unable to identify the mixture risking health or had difficulty doing so, causing unnecessary hospitalisations. Effective targeted antidotes can only be administered if the mixture causing the poisoning is correctly identified. Otherwise only more generic treatments, such as stomach pumping or activated charcoal, can be used to counteract poisoning.

It is also costly both for national authorities and industry to establish and



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The European Commission estimates that the total number of poison centre notifications could be 20m a year

maintain the national compliance processes and IT-infrastructure and for companies to comply with all the national requirements individually. According to

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estimates from the European Commission, the elimination of differing requirements between EU member states is expected to create net savings of €550m for companies, and, at the same time, improve the speed and quality of emergency responses.

Estimates

In a recent Chemical Watch and National

Chemical Emergency Centre (NCEC) poll, there were companies expecting to submit more than 100,000 poison centre notifications under the new system. The Commission is estimating that the total number could be up to 20m per year. As the physical location of the notification databases is not important from the point of view of the user, as long as they are accessible, secure and easy to use, they could be run by Echa or the member states. Negotiations on the precise responsibilities between the authorities are ongoing.

What Echa has already provided towards the continuing harmonisation process is an IT-tool for creating unique formula identifiers (UFIs) which will enable the correct identification of the product and its composition. This string of 16 numbers and letters will mean the poison centre can give instructions on the most appropriate specific medical response, once this is widely adopted. A check-sum feature is included so the poison centre will be able to tell if the caller makes a mistake in

reciting the code. The harmonised notification formats are also being finalised by the end of the year. These will make sure that the same information is available to emergency responders irrespective of the poison centre contacted. There will also be detailed technical and scientific guidance, which Echa is very good at after ten years of experience of producing guidance for REACH implementation. This and helpdesk support will be available by the end of 2018.

The member states will need to adapt their poison notification systems to be able to receive the information in the new format. This still requires a lot of work on their part, given the current variety in formats, submission systems and databases. How Echa's front-end system will transfer submitted information to the relevant member states is still under discussion. There will be a shared IT infrastructure, as the member states look to make different kinds of checks to enrich and verify the information received. They also want to retain their existing national databases. The expected structure gives rise to some data security concerns; a single harmonised database managed by Echa

would be simpler to operate and easier to keep secure. This notification submission system is expected to be available by the end of 2018.



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The new poison centre notification system, under Commission Regulation (EU) 2017/542, is to take effect by 1 January 2020 for consumer uses, 1 January 2021 for professional uses and 1 January 2024 for

industrial uses. Good progress has been made by the authorities in preparing to harmonise the current variety of notification systems, data formats and specific member state requirements. The UFI on the label will help dispel confusion about the identity of the mixture concerned and give a much higher level of confidence to emergency responders that they are providing the specific effective treatment needed. Regarding the IT-systems, there will not be full harmonisation and the result will be a shared system between Echa and the member states. For the users, it is important that it is accessible, secure and easy to use. What happens after submission is rather a technical issue for them as long as information is securely transferred to the relevant member state poison centres. Echa is well positioned to provide the necessary systems integration. As the authorities put these into operation, it is time for industry to start preparing for the new harmonised poison centre notifications.

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