chemical watch news & insight

by enhesa.

How do EU Poison Centre Notification and Swiss reporting frameworks differ?

EU Poison Centre Notification and Swiss reporting frameworks are structurally similar but legally independent. REACHLaw assistant manager, Divanshu Chawla, and junior associate, Janhvi Rawat, outline how to ensure market access

EXPERT FOCUS | 16 March 2026

If you think that EU Poison Centre Notification (PCN) compliance automatically fulfils Swiss reporting and unique formula identifier (UFI) obligations, you need to think again.

Although Switzerland has aligned several technical elements of its reporting system with EU CLP Annex VIII, reporting of substances and preparations is governed independently under the Swiss Chemicals Ordinance (ChemO).

ChemO constitutes a distinct national regulatory regime, with its own legal basis, procedural requirements and compliance obligations. Companies placing hazardous chemical preparations in Switzerland must therefore undertake a dedicated review to ensure full adherence to Swiss obligations.

Switzerland's system serves a dual purpose. The Swiss Chemicals Product Register (RPC) supports medical emergency response through Tox Info Suisse, while simultaneously functioning as a regulatory tool for enforcement authorities. The information submitted through reporting obligations enables competent authorities to conduct market surveillance, monitor compliance and implement follow-up measures.

Companies already familiar with EU PCN requirements should note that placing the same hazardous mixture on the Swiss market triggers a separate obligation and reporting requirement to the country's RPC.

From a regulatory perspective, it is important to clearly distinguish between products subject to reporting under Article 48 of ChemO and those subject to UFI requirements under the same article.

Products subject to reporting

In Switzerland, hazardous substances and mixtures for professional or private use must generally be reported to the RPC before being made available on the Swiss market. This obligation applies to substances and mixtures classified as hazardous under Swiss legislation.

UFI requirements

The obligation to include a UFI applies to all mixtures or preparations, biocides, fertilisers and tobacco products that are classified as presenting human health or physical hazards and that fall within the scope of poison centre-related information requirements.

For these mixtures, the UFI must be indicated on the product label or safety data sheet (SDS), depending upon the packaging. The deadline to include the UFI in this way was 1 January. Companies must ensure that the UFI used corresponds to the composition information reported in the Swiss RPC.

Distinctions

The key differences between EU PCN and Swiss reporting are outlined in the table on the following page.

UFI key features

Companies should also take into account the following key features of UFI management for reporting of hazardous preparations in Switzerland.

Categories outside the scope of UFI include:

• environmentally hazardous preparations – however, if they are already labelled with an EU UFI, this needs to be reported to RPC;

• mixtures which are not labelled as hazardous but only require additional supplement labelling (eg EUH208);

• preparations containing nanomaterials – these only require a UFI when classified as physical or human health hazards; substances (not mixtures);

• batteries (considered objects); and

• products exempt from reporting under Article 54 of ChemO.

UFIs generated for the EU/EEA (for the same composition) may be used for reporting in the Swiss RPC. However, UFIs generated only under the Swiss system are not recognised in the EU.

Each hazardous component within a multi-component product requires its own UFI and must be reported separately in the Swiss RPC.

Switzerland allows a one-time bulk import of 25+ newly generated UFIs per company, after which all allocations and updates must be managed via self-monitoring in the RPC.

While it is not mandatory to list the UFI in the material safety data sheet (MSDS) for "packaged products", it is strongly recommended. In this case, the UFI must be provided in Section 1.1 "product identifier" of the MSDS.

The UFI must state "UFI" followed by a 16-character alphanumeric code split into four hyphenated blocks (eg UFI: XXXX-XXXX-XXXX-XXXX); digits 0-9 are allowed, but the letters B, I, L, O and Z are excluded to avoid confusion with similar-looking numbers.

Preparations intended exclusively for industrial use in the EU, where the UFI is indicated only in the SDS rather than on the product label, may be imported into the Swiss market under the same approach in accordance with the Cassis-de-Dijon principle (as per Article 16a of the Swiss Federal Act on Technical Barriers to Trade).

Conclusion

EU PCN and Swiss reporting frameworks are structurally similar but legally independent systems governed by different legislative instruments and administrative practices. Companies placing hazardous preparations on the Swiss market must therefore:

• conduct a separate legal assessment under ChemO;

• verify whether the product falls within Swiss reporting scope;

• confirm whether a UFI is required under Swiss rules; and

• ensure correct UFI placement and reporting in RPC.

Failure to recognise these distinctions may result in market access barriers, enforcement measures, or corrective obligations.

Divanshu Chawla & Janhvi Rawat
Assistant manager / Junior associate
REACHLaw

	EU PCN	Swiss reporting
Legal framework	Article 45, CLP Regulation, Annex VIII	Article 48, Swiss Chemicals Ordinance (ChemO; SR 813.11)
Manufacturer definition	Any natural or legal person established within the community that manufactures a substance within that community	The broad "manufacturer" concept includes brand owners, relabellers, repackagers, distributors, Swiss toll manufacturers and downstream users
User categories	Consumer, professional and industrial	Professional and private
Industrial use	Separate legal category	Not recognised, may be treated under professional/private use
Scope of products	Mixtures classified for health or physical hazards	Dangerous preparations that meet the criteria for classification of physical, health or environmental hazards. Non-dangerous preparations exclusively classified under EU hazard (EUH) statements must be reported if the substances (specified in Article 19d, ChemO) are present above threshold limits
Low-volume exemption	N/A	Exemption below 100kg/year for professional use only (subject to conditions)
UFI obligation	Mandatory for mixtures (H2XX and H3XX)	Mandatory for preparations classified as human health or physical hazards (full rollout from 1 January)
Notification/reporting system	ECHA PCN Portal (centralised, multi-country)	Swiss RPC (national, standalone)