Product Registers in Europe

By

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Mandate

On commission from the Nordic Product Register group (NPG), a working group under the Chemicals Group under Nordic Council of Ministers the Norwegian Product Register, by Rune Eskøy, made an inquiry on the extent of Product Registers in Europe. Reports of the progress were made to NPG through the regular NPG-meetings.

Procedure

Electronic contact was used as far as possible, primarily electronic mail. A questionnaire containing questions about the existence, mandate and registration methods etc. was distributed based on the status in the Nordic Product Registers (appendix 1). In addition an example of a completed questionnaire from the Norwegian Product Register was enclosed, as well as a list of the countries that were initially contacted. The addresses were collected from different conference protocols and workshops. The countries where a mailing error was received, was also contacted by ordinary mail.

This document is based on the received answers, some variations might occur due to different interpretation of the questionnaire. The document will be revised if any corrections are received from the respondents.

Product Register is in this document defined as a register holding information on the formulation of products marketed by a trade name.

By MSDS we mean the Material Safety Data Sheet according to EU regulations.

Results

A questionnaire about the existence, mandate and registration methods of Product Registers was sent to 27 European countries. After a short period answers from 6 of these were received and after some reminders another 5 answers were received. A total of 16 countries answered the questionnaire. From the answers we understand that the enquiry was well received It is apparent that the Nordic countries are not alone in having Product Registers in Europe. Two countries have answered that they have Poisson Information Centres (not Product Register) and 10 countries have reported that they have a Product Register (not Poisson Information Centre). Four of the countries are only registering MSDS. In Iceland MSDS are collected, and a legislation change may implement a Product Register in the near future. Apart from this the collected information in the different registers are fairly similar.

The notification of new chemicals or the register of biocides is not considered, as these are obligatory registers in EU.

The Nordic Product Registers have been used as a reference as they have had a well working cooperation through several years. The questionnaire therefore was made on basis of the Norwegian declaration form with some modifications and may not be complete in areas not covered in Norway.

There are many countries in Europe with some kind of register of chemical substances and products. Unfortunately we have not been able to get in touch with all of these, but the answers we have received may indicate that a well working register is of great importance for the work done by the authorities.

Several of the answers indicate a request of more international cooperation and some have indicated that the Nordic model is desirable in a larger network.

With more than 50 % answers, we assume that the result is representative also for the countries from which we did not receive an answer.

Ireland and Iceland reported that they have no working Product Register, but that plans are made in Iceland to alter the legislation for the purpose of establishing one in the near future. For the time being they have an office collecting MSDS.

The Netherlands and Belgium have a register solely for use by the Poisson Information Centre with no annual update. However, they collect far more toxicological data than the Nordic Product Registers.

The accuracy of the collected information varies significantly between the countries. Most of the answers do not state the accuracy and we may therefore assume that they are collecting the formulations with weight percentages as intervals like in the MSDS. Where reported otherwise, this is noted under each country.

The specific countries

Austria:

www.umweltbundesamt.at
Austria has two registers for MSDS
1.
According the Austrian legislation (section 25 paragraph 8 and 9 of "Chemikalienverordnung 1999" Federal Law Gazette II No. 81/2000), the company which placed a preparation on the Austrian market for the first time, must send the safety data sheet for the preparation to the Umweltbundesamt (Federal Environment Agency) if:
- The preparation is classified as dangerous or
- The preparation is not classified as dangerous but containing in an individual concentration of >=1% by weight for non-gaseous preparations and >=0,2 % by volume for gaseous preparations at least, one substance posing health or environmental hazards, or one substance for which there are Community workplace exposure limits.

2.
According the Austrian legislation ("Giftinformations-Verordnung 1999" Federal Law Gazette II No. 137/1999), the company which placed a preparation, which is classified as very toxic, toxic or corrosive, on the Austrian market for general public must notify the preparation to the Umweltbundesamt (Federal Environment Agency).

The MSDS is scanned or received as .pdf – files and stored electronically. There is no update of those information.

Belgium:

www.health.fgov.be
Belgium does not have any Product Register, but a register serving the Poisson Information Centre. All companies importing dangerous chemicals into Belgium is obligated to declare to this register. All information is treated confidential and is only for use by medical personnel.

Cyprus:

www.mlsi.gov.cy
Cyprus has a register quite similar to the Nordic registers. The Register is based on legislation found on Internet: http://www.mlsi.gov.cy/dli. The register contains complete company and product information similar to the Norwegian register. The information is used for the local authorities and legislation. In near future they will open for data exchange with the Poisson Information Centre. The information is collected through ordinary mail or through inspection by the Labour Inspectorate. All information is treated confidential. The register will in the future work with information to importers and producers, and would like a more extended cooperation throughout Europe.

Denmark:

www.at.dk
The Danish Product Register runs the authorities' central register of substances and chemical products (chemicals) for use in work related to occupational health and safety and the outdoor environment. The Product Register is placed in the Danish

Working Environment Authority under the Ministry of Employment, and is responsible for obtaining and storing information on chemical products that are placed on the market in Denmark. Legislation on which the registering is based (Short description or Internet address):
Please see the Working Environment Act http://www.at.dk/sw12403.asp (S.49a) and special regulation for the Product register http://www.at.dk/sw12580.asp including guidelines.
Collection of data:
A filled-in paper form as sent to the Product Register, distributed to the executive officer who will check the information and enter them into the database. When all needed information is received an acknowledgement with a Product Register No is returned.
By Internet:
About electronic notification please see http://www.at.dk/sw12553.asp
If company uses product in own production, company identification is confidential. In the future they hope for further harmonization of notification to all Scandinavian product registers.

Estonia:

www.sm.ee
Estonia Do not have a regular Product Register, but for the time being, they register information on chemicals with high volume or high danger (HPV-chemicals). On their homepage is a database where producers can enter data about their products. The general public have limited access tothe database, inspectorates have limited access with password (they can in addition see real amounts of product, producer). Only authorized personnel have full access to the database. More information is found on http://www.ktk.ee , soon also in English.

Finland:

www.sttv.fi
The Finnish Product Register is a unit under STTV chemical dept. Chemicals which are labelled according to the health-, environment- and fire legislation and not classified products which contain a classified component or a component with a TLV ≥1 weight-% are registered. Declaring to the register is mandatory. The Product Register is based upon the legislation found in www.sttv.fi/kemo/TURE/decree374.pdf.
The collected information is similar to those of the Norwegian and Danish Product Register. The use of the information is for the authorities, Poisson Information and legislation purposes. Normally the information is received 50 % by ordinary mail and 50 % by e-mail or CD as .pdf - files. The declaration form is based on the MSDS. The volumes are confidential, but the formulations are onlypartly confidential .

France:

www.inrs.fr
The INRS is the officially approved body by Ministries in charge of Labour, Health and Agriculture, for the declaration of chemical substances and preparations.
The INRS is responsible for:

- Collecting information on all chemical products placed on the market in France, for use in industry or by the general public;
- Helping to prevent any risks they may entail;

- Responding to any request of a medical nature from specialized agencies and organizations concerned, e.g. in the event of intoxication;
- Preserving the confidentiality of the information collected.

The information collected in the pursuit of these aims is used for chemical risk prevention, and for answering any request of a medical nature concerning treatment of the disorders induced.

Data are received by ordinary mail. This is received at the INRS, distributed to the executive officer (a chemist) who will check the information and enter them into the database. Normally there will be some correspondence afterwards.
The Data is treated confidential.

Ireland:

www.hsa.ie
Ireland does not have a Product Register.

Iceland:

www.ver.is
Vinnueftirlit ríkisins is the Administration of Occupational Safety and Health in Iceland. The Department of Chemical and Industrial Hygiene deals with substances and chemicals used in workplaces with regards to the safety and occupational health effects of products. They do not have a Product Register in Iceland, but there is an interest of establishing a Product Register. Iceland is awaiting a legislation regarding chemicals, and after that there should be no obstacles in the way. They are currently gathering Safety Data Sheets, but do not register the ingredients and the collection of the MSDS is not complete.

Italia:

www.iss.it
Instituto Superiore di Sanitá registrers all preparations placed on the Italian market and falling into the scope of directive 1999/45/EC, implemented in Italy by the Legislative Decree n. 65 of 14 March 2003. Preparations solely dangerous for the environment are excluded by the obligation. Collection of data: Data are preferably uploaded directly by the manufacturer/importer/distributor into the system, through an FTP procedure, by password.
By Internet/e-mail etc.: Attachments to e-mails are also allowed, even if not recommended. Other (special programs, limited access, personal, etc.): Program: ISSFormula. The whole project is described in their dedicated webpage www.preparatipericolosi.iss.it. In the archive (archivio preparati pericolosi) each notifying company is registered. Each company has a code (company code) and one couple of Keys (userID+password). Through this registration it is possible to notify the dangerous preparations. Each preparation has a code (preparation code). Company code plus preparation code constitute the coordinates of one declaration. The user has to fill up electronic forms usingthei r program (ISSFormula); such forms have to be sent to us by a "zip file" created by the program. The data are visible by password in the web site. A system of links is created: a distributor may link his declaration to the supplier’s declaration by appropriate coordinates. The register provides the user with a guide for the compilation of program and with assistance by phone and email.
Controls are made.

The Netherlands:

www.rivm.nl

The NVIC (forkortelse?) forms part of the National Institute for Public Health and the Environment (Dutch abbreviation: RIVM). The Dutch National Poisons Information Centre is not a "real" product register organization to keep track of (quantities) of products that go to the market. Companies are only obligated to deliver adequate information on the toxicological effects of their dangerous products. The registration is made by Voluntary registration for all products not regarded dangerous according to directive 1999/45/EC. Cosmetic products are registered voluntary by the Sysdecos application. Mandatory for dangerous products according to 1999/45/EC (this also includes 'crop protection products') and mandatory for biocides due to directive 98/8/EC (see article 23).

Norway:

www.produktregisteret.no

The Norwegian Product Register is a subordinate of the Ministry of the Environment, and it is the Authorities central register of dangerous chemicals put on the Norwegian market. The information registered is both about the responsible company and the product, in addition to the products areas of use, type of product, classification and amount of production/import/export and name change (where a product is sold under different names). The information is updated on a yearly basis. The information concerning formulation and turnover is treated confidential. In statistics quantities (tons) and areas of use and product type is kept confidential if there are few companies.. The data is only used by authorized persons at specially approved authorities. The information is primarily used for the Authorities own tasks, Poisons Information and legislative work.

In Norway the formulation has to be given to 100.0% (exact weight percentage and full formulation), but the Norwegian register is not as extensive as in Sweden and Denmark, as the Norwegian register is based on the *Regulations relating to the classification, labelling, etc. of dangerous chemicals*, and not customs tariff codes as in Sweden and Denmark. The collection of data is mainly by ordinary mail , or by special application: E-declaration (for the time being only in a Norwegian version).

Poland:

www.chemikalia.mz.gov.pl

In Poland the register is an Authority (Bureau for Chemical Substances and Preparations) and the declaration is obligatory for all preparations placed on the market which are classified as dangerous according to the Directive 1999/45/EC. According to the Polish legislation (article 23 of the Act of 11 January on chemical substances and preparations) the company which is responsible for the placing a dangerous preparation on the Polish market should providing to the Inspector for Chemical Substances and Preparations following information: name and address of the person placing a dangerous preparation on market, trade name of dangerous preparation and Safety Data Sheet (SDS). Whenever new significant information becomes available the person who placing a dangerous preparation on a market should update SDS and send updated SDS do the Inspector. The data are collected in ordinary mail and are stored in computer database. The data base is not confidential, however it is not made public. The information may be used by the government and the poison information.

The Inspector may request to reveal a detailed chemical composition of a dangerous preparation. This information is confidential and may be used only for medical purposes in prevention and treatment.

Slovakia:

www.cchlp.sk
Do not have an ordinary Product Register, but collects data according to EU dir. 67/548/EEC (new substances), 793/93/EC (Existing substances) and 98/8/EC (Biocides). Public information is available at www.cchip.sk partly in English.

Sweden:

www.kemi.se
The Product Register is a large database of chemical products kept by the Swedish Chemicals Inspectorate. The information is used to support work on risk assessments, statistical calculations, substance flow analyses and supervision. The database gives information mostly to the Inspectorate but other authorities, researchers, organizations and the public may also use the adapted information.

The Legislation is based on the Customs tariff codes and is primarily covering health and environmental classified products. The declaration of volumes is obligatory and is updated annually. Collection of data is primarily by ordinary mail, the companies can, if they desire, submit by e-mail. All information regarding volumes, formulation is treated confidential and also use if few companies or lines (branches?) are involved.

All constituencies going into the formulation in 5 % or more, all classified components, CMR- and conservation components, all constituencies contributing to the classification of the product, allergens, substances found in the appendix to KIFS 1998:8, substances and products with customs numbers 22,28 or 29 and contaminants must be declared.

Switzerland:

www.bag.admin.ch
The Swiss Product Register is run by the Chemical Product Division of the Swiss Federal Office of Public Health.
It contains all chemical products and substances that have legally been placed on the Swiss market since 1972. It contains about 250'000 registered products, slightly more than half of them are currently still on the Swiss market. Not included are food products, cosmetics, drugs and ionizing substances and products. They distinguish between products for public use (consumer products) and products for industrial use (commercial products). Industrial products are exclusively destined for use in trade and industry, whereas products for public use are destined for public use (and of course are available for industrial use as well).
The Declaration is obligatory and covers all dangerous products (according to Swiss classification system based on health effects), thus products containing dangerous substances, volumes and environmental/fire hazard products is not covered. They require the formulation to 100 %. The legislation is based upon:

- Bundesgesetz über den Verkehr mit Giften (Giftgesetz) vom 21. März 1969 http://www.admin.ch/ch/d/sr/c813_0.html

Deleted: In Poland the register is an Authority and the declaration is obligatory for all dangerous chemicals. They register all chemicals dangerous to health, fire and environment, but there is no annual update of information. The company have to submit the company data and MSDS. In some cases where consumer products are involved the company also must give some details on separate constituencies in the product. The data is collected mainly in ordinary mail and is partly stored in a database that the companies can access directly. The data base is not confidential; however it is not made public. The information is used by the government and the poison information. ¶

- Giftverordnung vom 19. September 1983 (Stand am 4. März 1997) http://www.admin.ch/ch/d/sr/c813_01.html

There is no annual update of the information. The data registered is used by the authorities and the poison information.
The data is adapted and published in a list called ”Giftliste”, this is accessible on the Internet: http://igs.naz.ch/tox/en/index.html

Collection of data: 1. Products for public use

By ordinary mail using the official green questionnaire:
http://www.bag.admin.ch/chemikal/publ/i/fbd.pdf

The Green Questionnaire is handled by executive officers, who control and classify products. Data is then manually transferred into database.

Collection of data: 2. Commercial products

By ordinary mail using the official Declaration Form for Commercial Products:
http://www.bag.admin.ch/chemikal/publ/i/mb_ie.pdf
In both cases the requested information can be sent via Internet (email only). However, it is not recommended for confidential data and is in the responsibility of the registrant.

The complete formulation is confidential.

The Swiss chemical legislation is currently under total revision. The future chemical law will be harmonised to a great extend to the EU legislation. The new legislation is planned to enter into force in mid-year 2005. http://www.parchem.ch

This has a great impact to the extent of the future product register and the whole registration process. Basically only dangerous products according to the EU classification will be registered and only information (according to composition) that is also available on the MSDS will be collected. The complete composition (up to 100%) will be collected only for biocides.

However, the final regulation is still under elaboration.

Great Britain:

According to the “Nordic definition” the register in Great Britain is not an ordinary Product Register, but an office collecting data of new substances acc. to 92/32/EEC. Classification and labelling of the substances are made public, but the formulation and volumes are treated confidentially. The information that is to be kept confidential is to be mentioned by the declaring company. The information may be sent by e-mail, but this is not recommended.

APPENDIX 1

Survey of Product Registers in Europe

by Rune R. Eskøy, rune.eskoy@produktregisteret.no . The Product Register in Norway.
www.produktregisteret.no .

Purpose: Creating a communication and discussion network for offices working in the HMS-field with main objective to keep track of chemical products. What kind of information is registered and for what purpose it is used.				
The name of organization:				
Country:				
Address:	**Contact person:**	**E-mail:**	**Phone:**	**Telefax:**

Organization:

Is the registering unit a self supported unit, a department, an executive office or other.

Is the registration:
☐ *Voluntary*
☐ *Mandatory, (if mandatory please fill in the next box).*

Legislation on which the registering is based (Short description or Internet address):

What kind of products are registered (Short description):

Is there any charter, legislation, act or other in which the registration is founded.

What kind of information is registered:

For the company:
☐ Name
☐ Address
☐ Contacts
☐ Organization/-no.

For the Product:
☐ Name ☐ Use ☐ Product type ☐ Formulation*
☐ Producer of product ☐ Responsible company
☐ Customer(s)
Classification: ☐ Health ☐ Fire ☐ Environment
☐ Transport ☐ Packaging ☐ Physical data
☐ Environmental data
☐ Quantities: ☐ *Imported* ☐ *Produced* ☐ *Exporter*
☐ Custom Tariff Codes
Updating of quantities: ☐ *annual* ☐ *every 2. year* ☐ *None*

**what kind of accuracy in formulation, complete or partly formulation.*

Other aspects:

Use of registered data *(What is the main use of the data?)*:
☐ Governmental ☐ Poison Information Center / Medical ☐ Legislation ☐ Research
☐ Public information

Who is using the data and what kind of access to them:
☐ *Authorities* ☐ *Medical personnel* ☐ *Poison Information Center* ☐ *Public*
Is the register also a poison information center? ☐ Yes ☐ No

Other information:

Is the data collected: ☐ Manually ☐ Electronically ☐ Both
Give a short description of the handling of data:
Collection of data: By Internet/e-mail etc.: Other (special programs, limited access, personal, etc.):

Is the collected data handled as: ☐ Confidential Confidential with respect to: ☐ Formulation/composition ☐ all ☐ partly ☐ Quantities (imported, produced, exported) ☐ Other*
*Give a short description:

Future plans

Give a short description of the future plans for the register.

Other information/comments: