Toxicovigilance of chemicals and biocides

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Role of the Poison Centre & Legal obligations

Role of the Poison Centre

- The Poison Centre has a directory of the composition of hazardous mixtures being placed on the Belgian market (7,320 new notifications in 2018).
- The aim is the prevention and emergency response in case of an accident.
- A hazardous mixture must be notified to the Poison Centre at least 48 hours before its placing on the market by the responsible for the product.
- The emergency line is available 7 days a week and 24 hours a day.
- The Centre received 59,313 calls in 2018.

Emergency No : 070 245 245

Who has to make a notification to the Poison Centre?

- **Importers and downstream users placing mixtures on the market have to submit relevant information to the BE Poison Centre allowing them to formulate emergency health response (art. 45 of CLP).**

- Re-branders are considered as downstream users by the Belgian authorities.

- Re-branders must comply with the obligations under Article 45 and are legally liable for their notifications in Belgium.
  - In this way, BE disagrees with the interpretation of a DU as made by the Commission in its document CA_22_2019.
  - BE has submitted an introductory note explaining this point of view in the 'technical guidance on Annex VIII to CLP'.

How to make a notification in Belgium?

- By using the Excel file available on the website of the Poison Centre:

  https://www.centreantipoisons.be/entreprise/comment-d-clarer-au-centre-antipoisons

- As from 1 January 2021, you may alternatively choose to use the format available on the ECHA website.

- In both cases, you should submit the declaration directly to the Belgian Poison Centre.

- Fees must be paid for notifications submitted to the BE Poison Centre.

ECHA's PCN portal

- **IMPORTANT:** Notifications made through the ECHA portal CANNOT be read or processed by the Belgian Poison Centre before the 2nd quarter of 2020. Therefore, important information would not be registered in the database if using this portal for a notification.

- **ADVICE:** Until further notice, keep on using the present system in force for declarations to the Poison Centre for Belgium and the Great-Duchy of Luxemburg (spreadsheet & email).

ECHA's PCN portal - eDelivery

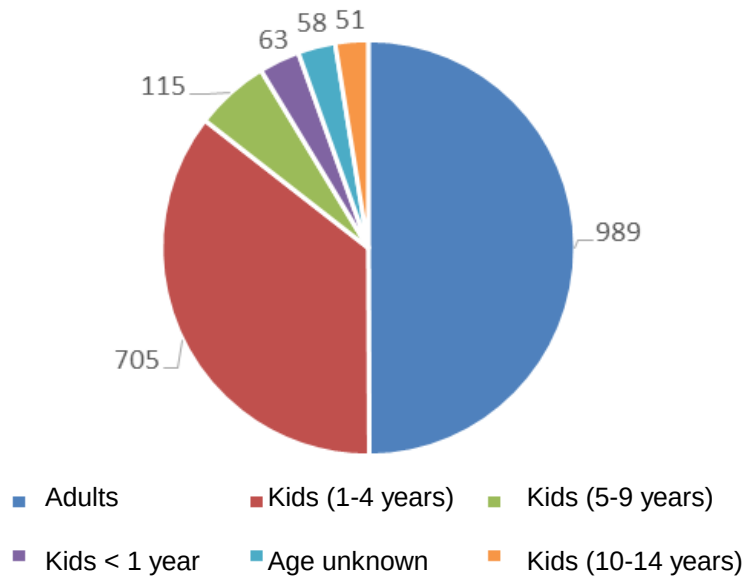
- In the future, BE forecasts the possibility of a notification through the ECHA portal only with the eDelivery system.

- The BE Poison Centre shall keep its own database and shall make no connection with the ECHA database.

Toxicovigilance of Biocides

- In 2018, the Poison Centre received 3,106 calls for biocides.
- 173 calls regarding 'Borderline Biocidal Products'
- 2,707 standard calls relating to real exposures
- 266 information requests
- Almost 90% of the exposures to biocides are accidental. This includes small scale and limited contacts of young children and animals with biocides, such as ant bait stations, for instance.

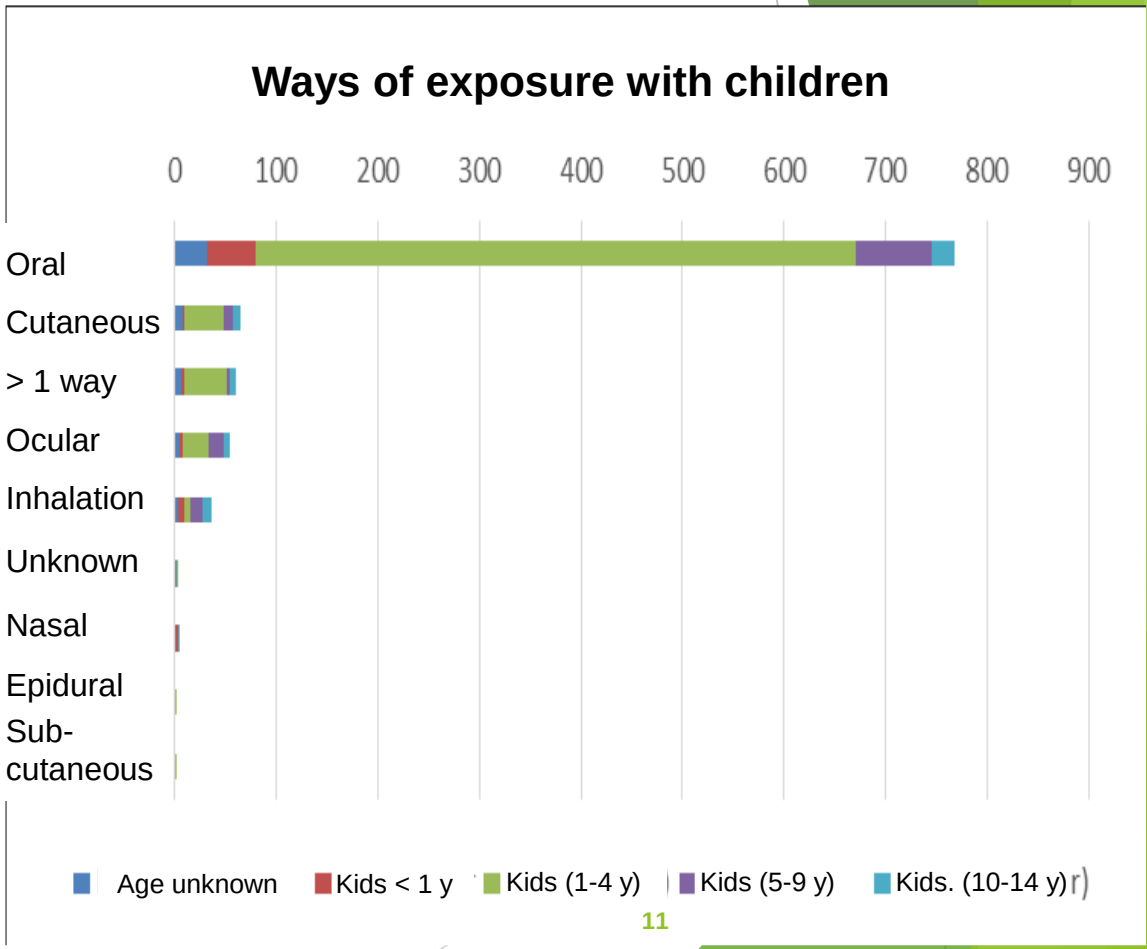
Distribution of victims by age categories



Ways of exposure - 2018

Ways of exposure with adults

Way of exposure	#	%
Inhalation	308	31.2%
Oral	293	29.6%
Cutaneous	153	15.5%
Ocular	143	14.5%
> 1 way	83	8.4%
Other	3	0.3%
Bite, sting, scratch	2	0.2%
Unknown	2	0.2%
Rectal	1	0.1%
Subcutaneous	1	0.1%



Types of biocides causing symptoms for calls involving children	
Repellents and attractants (as biocide)	20.65%
Swimming pool/Sauna: chlorine disinfectant (Biocide)	18.84%
Human hygiene (biocide)	17.75%
Insecticides, acaricides and products to control other arthropods, excluding products when used as pesticides	17.03%
Disinfectants and algaecides not intended for direct application to humans or animals (Biocide)	11.59%
Rodenticides as biocide	3.62%
Food and feed area (Biocide)	3.26%
Foreign biocides	3.26%
Construction material preservatives (Biocide)	2.54%
Wood preservatives (Biocide)	1.09%
Veterinary hygiene (Biocide)	0.36%

Distribution of biocides by type for all victims together

Type	Name	Number of different agents	% of different agents
PT 14	Rodenticides as biocide	780	28,69%
PT 18	Insecticides, acaricides and products to control other arthropods, excluding products when used as pesticides	738	27,14%
PT 2	Disinfectants and algaecides not intended for direct application to humans or animals (Biocide)	469	17,25%
PT 1	Human hygiene (biocide)	323	11,88%
PT 19	Repellents and attractants (as biocide)	254	9,34%
PT 4	Food and feed area (Biocide)	101	3,71%
PT 8	Wood preservatives (Biocide)	71	2,61%
PT 10	Construction material preservatives (Biocide)	59	2,17%
Foreign biocide	Foreign biocides	48	1,77%
PT 3	Veterinary hygiene (Biocide)	10	0,37%
PT 11	Preservatives for liquid-cooling and processing systems (Biocide)	9	0,33%
Biocide - not specified		8	0,29%
PT 12	Slimicides (Biocide)	6	0,22%
PT 21	Antifouling products (Biocide)	2	0,07%
PT 5	Drinking water disinfectants (Biocide)	2	0,07%
PT 6	Preservatives for products during storage	2	0,07%
PT 13	Working or cutting fluid preservatives	2	0,07%
PT 22	Embalming and taxidermist fluids	1	0,04%
Total		2.719	100%

Distribution of active substances for Type 14: Rodenticides (2018)

Rodenticides based on anticoagulants remain the major group with difenacoum as the main representative (31.06%). However, alpha-chloralose has started increasing since its detection in 2016.

Active substance	#	%
Difenacoum	246	31,06%
Raticide (unknown)	242	30,56%
Chloralose	97	12,25%
Brodifacoum	89	11,24%
Bromadiolone	38	4,80%
Difethialone	27	3,41%
Flocoumafen	18	2,27%
Raticide anticoagulants	11	1,39%
Coumatetralyl	9	1,14%
Bromadiolone-difenacoum	7	0,88%
Phosphine	2	0,25%
Corn cob powder	2	0,25%
Warfarin	1	0,13%
Chlorophacinone	1	0,13%
Bromethalin	1	0,13%
Difenacoum-brodifacoum	1	0,13%
Total	792	100,00%

Distribution of active substances for Type 2: Disinfectants and algaecides not intended for direct application to humans or animals.

The great majority of exposures under this type of biocide are in relation with products containing chlorine (83.21%). A striking fact is the number of calls involving the use of chlorine in swimming-pools, where the exact name of the product is not known or impossible to ask for at the moment of the call. Such contacts are of course season-related and highly dependent on the weather.

Active substance	#	%
Swimming-pool chlorine	166	42.24%
Natrium hypochlorite	144	36.64%
Quaternary ammonium	31	7.89%
Troclosene sodium	8	2.04%
Ethanol + isopropanol + quaternary ammonium	7	1.78%
Unknown	7	1.78%
Sodium dichloroisocyanurate dihydrate	5	1.27%
Chlorocresol	4	1.02%
Algaecide	4	1.02%
Symclosene	4	1.02%
Polyhexamethylenebiguanide + quaternary ammonium	4	1.02%
Laurylamine dipropylenediamine + quaternary ammonium	3	0.76%
Quaternary ammonium. + propan-1-ol	2	0.51%
Quaternary ammonium. + peracetic acid	1	0.25%
Quaternary ammonium. + laurylamine dipropylenediamine + 2-phenoxyethanol	1	0.25%
Hydrogen peroxide	1	0.25%
Propanol + isopropanol	1	0.25%
Total	393	100.00%

Practical recommendations for labelling

- Choose product names allowing direct identification without any ambiguity;

- Mention the authorisation number, notification number or registration number in a visible way, preferably below the name of the product;

- Mention the current name of chemical components instead of IUPAC-names;

- Highlight the information about the risks relating to the use of the product in combination with other products or that are not directly linked to a hazard pictogram.

  (For instance, do not mix a hypochlorite with acid products).