Harmonising ES Short Titles and ES Tables of Content

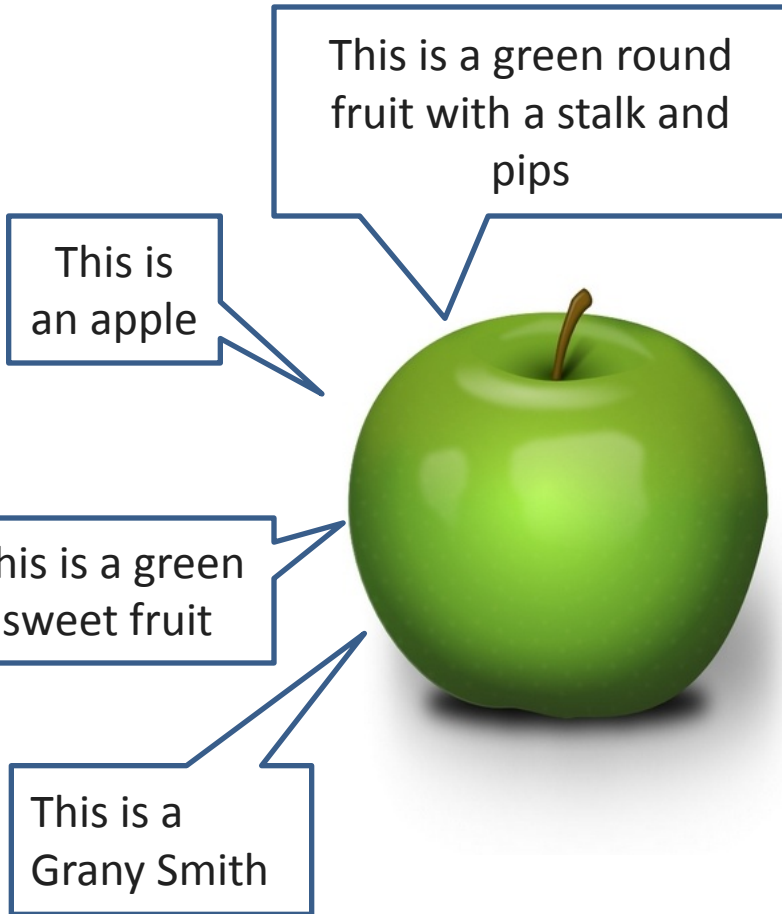Sylvie Lemoine

on behalf of : Cefic, DUCC, ECHA

ENES 4 meeting

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Recommended practice: the ES Table of Content

➡ ENES 2 - agreed: **Insert a table of content (ToC)** of ES at the beginning of SDS annex: overview of exposure scenarios

- Table of Content consists of a **list of ES short titles**
  - structured according to life-cycle stages and
  - based on use descriptor system as contained in ECHA guidance as a starting point

➡ ENES 3 - Harmonisation of ES Short Titles agreed in principle: **structure and 'rules' needed**

➡ ENES 4 - Proposal for structure and 'rules' of ES short titles
  - to be built from **standard phrases**
  - **enable IT- 'transport'** in the supply chain
  - be '**human-readable'**

Why harmonisation?

This is a green round fruit with a stalk and pips

This is an apple

Communication (IT)

<html xml lang='en'<head><title>@ display_info= 1

This is a green sweet fruit

This is a Grany Smith

Ceci n'est pas une pomme

« This is not an apple » !!

Benefits of harmonising ES Short Titles

- Ease comparison and further processing of ES from different suppliers:
    - DU using different substances/different suppliers
    - Distributors

- Enable translation

- Facilitate consistency and linking of:
    - 'brief general description of identification of uses' in the Registration Technical Dossier (IUCLID)
    - ES in the CSR and
    - ES communicated downstream

Altogether, this will result in resource efficiencies and, ultimately, in higher compliance level

Objectives of the harmonisation proposal

- The ToC assits DU in 'manually' sorting out the list of ES and quickly identifying those applying to their sector: ES Short titles should be **understandable by 'human readers'**

- **Multiple purposes of harmonised ES short titles under REACH**
  - Table of content (ToC) of annex to SDS
  - ES short titles in the annex to SDS
  - Use name in the Brief general description of uses in IUCLID (Section 3.5)
  - CSR Chapter 9: sub-headings
  - Section 1.2 of the SDS for the substance: reference to the ES ToC

- **The 'market description' is at the heart** of the structure of ES short titles

- Built from **standard phrases**

Proposed Guiding Rules for Building and Structuring ES Short Titles (1)

MANDATORY

1st identifier: LIFE CYCLE STAGE, one of the following

> formulation
>
> industrial use *
>
> professional use *
>
> consumer use
>
> article service life (consumer)
>
> article service life (worker)

2nd identifier: **MARKET SECTOR information**

> **PC name (+PC number) or AC name (+AC code)** for ES for service life
>
> **and/or SU name (+SU number)**
>
> **and/or more detailed standardised qualification of the market sector**
>
>> - sub-PC/AC names
>>
>> - TARIC or UCN codes (subset of these to be defined)
>>
>> - NACE codes (subset of these to be defined)

* alternative: use IUCLID 5,4/Chesar life cycle terminology: 'use at industrial site' / 'use by professional workers'

Proposed Guiding Rules for Building and Structuring ES Short Titles (2)

WHEN RELEVANT

- 3rd identifier: Additional information
  - technical function of a substance (pick-list: R12 ECHA Guidance)
  - Information on the process e.g. "closed system"; "water-based" or "solvent-based" or "dry" process/product (limited set of phrases, to be defined)
  - Physical form e.g. powdered products or dust forming applications, spray products or aerosol forming conditions (limited set of phrases, to be defined)

Examples

	Current ES title:	Use descriptors reported in title section	ES short title proposed **1st identifier**, *2nd identifier*, 3rd identifier	
1	**Industrial use as a fuel additive**	PC13	**Industrial use;** *Fuels (PC13)*	
2	**Professional use in film cleaning and copying**	PC35	**Professional use;** *Washing and cleaning products (including solvent based products) (PC35); Printing and reproduction of recorded media (SU7);*	PC +SU
3	**Formulation and (re-)packaging of paint removers**	PC9a, SU10	**Formulation;** *Coatings, paints, thinners, removers (including solvent based products) (PC9a); removers (paint-, glue-, wall paper-, sealant-remover)*	Sub-PC
4	**Professional use in dry-cleaning**	PC35	**Professional use;** *Washing and cleaning products (including solvent based products) (PC35); Solvent based; Application in closed systems*	3rd ident

Examples

	Current ES title:	Use descriptors reported in title section	ES short title proposed 1st identifier, *2nd identifier*, 3rd identifier	
6	**Industrial use as a bleaching agent for mechanical and recycled pulp**	PC26	**Industrial use;** *Paper and board dyes, finishing and impregnating products; including bleaches and other processing aids (PC26);* Bleaching agents	3rd ident. (tech funct)
7	**Industrial use of X1 as catalyst and catalyst precursor**	PC19,20 SU8,9,10	**Industrial use;** *Manufacture of bulk, large scale chemicals (including petroleum products) (SU8); Manufacture of fine chemicals (SU9).* Catalyst and catalyst precursor	SU (no PC) 3rd ident.
8	**Manufacture of batteries using X1**	PC19, SU16, AC3	**Industrial use;** *Manufacture of accumulators, primary cells and primary batteries*	NACE code (31.4)

Summary of feedback received by ENES 4 participants to date

Thank you to those of you who responded !

- Support for:
  - Harmonisation goal
  - Start from life-cycle stage + build on selected use descriptors

- More work/refine:
  - Descriptor names (R12) generally too long for 'short' titles
  - Broad uses, multi-PC or multi-SU: need to find suitable solution
  - Combination of identifiers / guiding rules to be refined e.g. SU vs PC precedence

- Questions:
  - Compatibility with IT systems and ESCOM XML?
  - Consistency ES short titles and use description in Technical Dossier: long-term process?

Next steps

- Address feedback received by ENES 4 participants

- Initial testing of guiding rules is encouraging: further testing needed? More work on 'identifiers' and use descriptors?

- Resolve outstanding technical questions and rules

- Update ESCOM catalogue with a selected set of new standard phrases

- Consider changes at ECHA's level

  – Guidance R12

  – Chesar / IUCLID 3.5 adaptation

Remember

- **Harmonisation of ES Short Titles will save resources and time**
- **Building harmonised ES short titles from standard phrases is possible**
  - Start from Use Descriptors ('extended'), even though not perfect
  - Balance to be found: title should say enough, but not too much
  - 'Human-readable'
- **Some rules for assigning standard phrases have been tested for feasibility**
- **More work is needed**
- **All actors need to adapt: benefits > drawbacks**
- **SDS systems will need to be modified accordingly**

Ceci n'est pas une pomme

« Of course, this is an apple » !!