



ENES 4, Session 2. Harmonising ESs for Communication: Rubber Chemical Example as Test for ES Short Titles

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Rubber Chemical Example as Test for ES Short Titles (1)

	Current ES title:	Use descriptors reported in title section	ES short title proposed 1 st identifier, 2 nd identifier, 3 rd identifier	Comments / Follow-ups
1	Formulation and (re)packing of substances and mixtures	SU10	Formulation ; <i>Formulation [mixing] of preparations and/or re-packaging (excluding alloys) (SU10)</i>	Generic ES, no other UDs considered necessary. Is second identifier required here?
2	Production of tyres and rubber goods	SU 11 PC32	Industrial use ; <i>Manufacture of rubber products (SU11); Manufacture of rubber tyres and tubes</i>	1 st half of NACE code C22.1.1 – “ Manufacture of rubber tyres and tubes ; retreading and re-building of rubber tyres” would point the DU to the fact that also tyres are addressed in this ES Problem: second half of above NACE code contradicts contents of ES2, but relevant for ES 3. Including PC 32 wording does not appear to add value (not specific enough).
3	Retreading	SU11, PC32	Industrial use ; <i>Retreading and rebuilding of rubber tyres</i>	SU11 wording not added as 2 nd half of NACE code C22.1.1 – “Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres ” considered more relevant and precise. Including PC 32 wording does not appear to add value (not specific enough).

Rubber Chemical Example as Test for ES Short Titles (2)

	Current ES title:	Use descriptors reported in title section	ES short title proposed 1 st identifier, 2 nd identifier, <u>3rd identifier</u>	Comments / Follow-ups
4	Tyre mounting and dismounting and handling of technical rubber goods	AC10	Article service life (worker); Rubber articles (AC10)	Would TARIC codes be of help here for further specification? Where can the full list be found (link from Guidance R.12 not functional)?
5	Use of rubber goods	AC 1,2,10	Article service life (consumer); Rubber articles (AC10)	Would wording of AC 1 and AC2 add value (the rubber articles indeed are part of vehicles and machinery)?
6	Use of tyres	AC 10	Article service life (consumer); Rubber articles (AC10)	TARIC code not helpful to simply communicate that “tyres” are addressed in the ES: both options from TARIC appear much too complicated: TARIC 4011 “New pneumatic tyres, of rubber” TARIC 4012 “Retreaded or used pneumatic tyres of rubber; solid or cushion tyres, tyre treads and tyre flaps, of rubber”

Conclusions

Does the proposed structure work?

- In principle YES
- Flexibility owing to 3rd identifier acknowledged
- NACE, TARIC and UCN codes as such not capable of filling gaps in UD system

Are some elements missing?

- Library to describe specific uses required
 - Examples from Guidance R.12 describing the ACs as starting point?
- Specific UDs to be added to ECom catalogue
- 3rd identifier should allow for individual phrases

Concept for ES short titles appears viable, but requires an extended ECom catalogue and flexibility in 3rd identifier

