

Harmonising ES Short Titles and ES Tables of Content

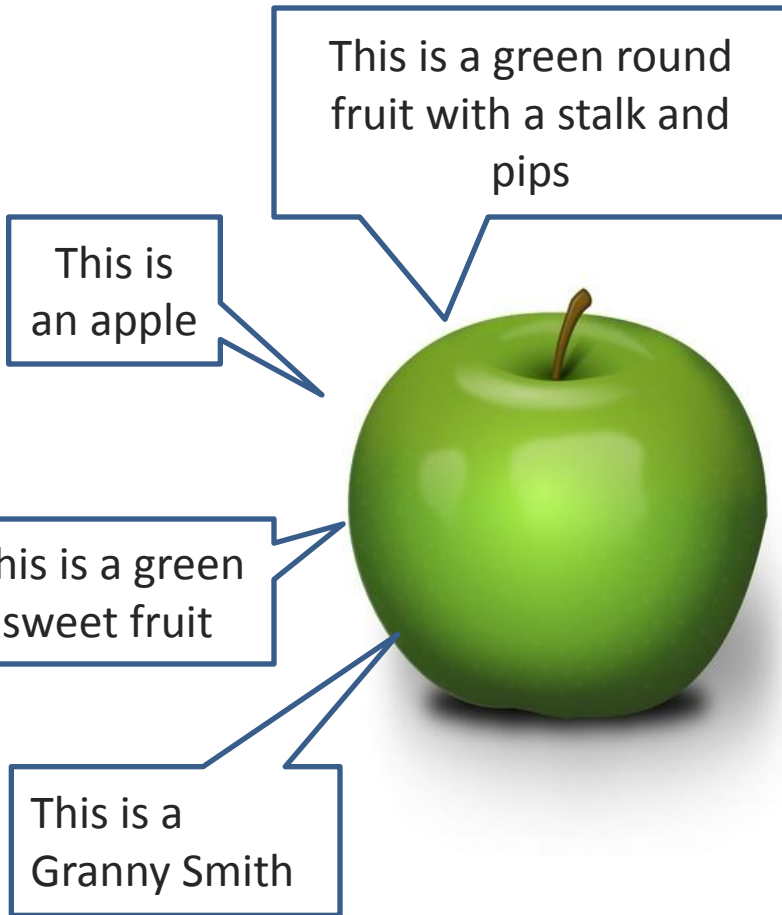
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on behalf of : Cefic, DUCC, ECHA

Cefic RIEF I meeting
21 June 2013

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 (ECHA guidance R12) 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**
 - to enable IT- 'transport' in the supply chain
 - To be **'human readable'**

Why harmonisation?



Communication (IT)

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



« 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 uses' in the Technical Dossier (IUCLID) processing into information for mixtures
 - 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 assist 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 uses of harmonised ES short titles under REACH**
 - Table of content (ToC)
 - ES itself
 - Brief general description of uses IUCLID 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 which has yet to be defined)
- NACE codes (subset which has yet 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 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 <i>1st identifier, 2nd identifier, 3rd identifier</i> | |
|---|--------------------------------------------------|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| 1 | Industrial use as a fuel additive | PC13 | Industrial use; <i>Fuels (PC13)</i> | |
| 2 | Professional use in film cleaning and copying | PC35 | Professional use; <i>Washing and cleaning products (including solvent based products) (PC35); Printing and reproduction of recorded media (SU7);</i> | PC +SU |
| 3 | Formulation and (re-)packaging of paint removers | PC9a, SU10 | Formulation; <i>Coatings, paints, thinners, removers (including solvent based products) (PC9a); removers (paint-, glue-, wall paper-, sealant-remover)</i> | Sub-PC |
| 4 | Professional use in dry-cleaning | PC35 | Professional use; <i>Washing and cleaning products (including solvent based products) (PC35); Solvent based; Application in closed systems</i> | 3 rd ident |

Examples

| | Current ES title: | Use descriptors reported in title section | ES short title proposed 1 st identifier, 2 nd identifier, 3 rd identifier |
|---|----------------------------------------------------------------------|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6 | Industrial use as a bleaching agent for mechanical and recycled pulp | PC26 | Industrial use; <i>Paper and board dyes, finishing and impregnating products; including bleaches and other processing aids (PC26); Bleaching agents</i> |
| 7 | Industrial use of X1 as catalyst and catalyst precursor | PC19,20 SU8,9,10 | Industrial use; <i>Manufacture of bulk, large scale chemicals (including petroleum products) (SU8); Manufacture of fine chemicals (SU9). Catalyst and catalyst precursor</i> |
| 8 | Manufacture of batteries using X1 | PC19, SU16, AC3 | Industrial use; <i>Manufacture of accumulators, primary cells and primary batteries</i> |

3rd ident.
(tech funct)

SU (no PC)
3rd ident.

NACE code
(31.4)

Summary of feedback received by ENES 4 participants

- Support for:
 - Harmonisation goal
 - Start from life-cycle stage + build on selected 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 ECom XML?
 - Consistency ES short titles and use description in Technical Dossier : long-term?

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?
- Workshop in September 2013 to resolve outstanding technical questions and finalize the rule set
- Update ESCOM catalogue with a selected set of new standard phrases
- Consider changes at ECHA 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

ESCom Phrase Catalogue

ESCom Phrase Catalogue will only facilitate standard phrases for generic ES titles. So no coverage of specific titles by ESCom!!

Therefore, when building titles for uses (CSR => ES):

TRY TO DESCRIBE THE USE AS GENERIC AS POSSIBLE!!!

From experience: this is feasible, even for apparently very specific uses

The ToC will facilitate DU in identifying the applicable use and ES

Thank you for your attention!



« Of course, this is an apple » !!