

Harmonized short titles for ES Example for differentiation needs between article types

Agenda Point 2.3

ENES4

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The case

- Flame retardant in polymer (PS) articles
- Substance property profile SVHC like

Current ES title:	ES short title proposed 1 st identifier, 2 nd identifier, <u>3rd identifier</u>
Use of Expanded Polystyrene (EPS) articles	<p>Service-life, polystyrene expansible (TARIC 390311)</p> <p>Alternatives: Service-life (workers), polystyrene expansible, <u>dust generating process</u></p> <p>Service-life (consumers), polystyrene expansible</p>
Use of Extruded Polystyrene (XPS) articles	<p>Service-life, <i>extruded polystyrene articles (XPS)*</i></p> <p>Alternatives: Service-life (workers), <i>extruded polystyrene articles, <u>dust generating process</u></i></p> <p>Service-life (consumers), <i>extruded polystyrene articles</i></p>

* Information not available in the NACE/TARIC/UCN lists.

Current ES title:	ES short title proposed 1 st identifier, 2 nd identifier, <u>3rd identifier</u>
Use of High Impact Polystyrene (HIPS) articles	Service-life, <i>High impact polystyrene articles (HIPS)*</i>
Use of textile articles containing polymer dispersion	Service-life, <i>fabric, textiles and apparels (AC5)</i>
Use of Flexible Elastomeric Foam (FEF) articles	Service-life, <i>flexible elastomer foam articles (FEF)*</i>

* Information not available in the NACE/TARIC/UCN lists.

Reasons for differentiation

Release/exposure patterns driven by

- Type of article and corresponding use conditions
 - HIPS articles can warm up during use
 - Particulate emission during cutting of EPS and XPS insulation material (workers activity)
- Type of article and corresponding emission factors
 - emission factor from polymer foam (EPS/XPS) much higher than solid polymer (HIPS)

Conclusions

- Example supports the harmonisation proposal but:
 - Life cycle stage : need for further differentiation of service life?
 - Article type: need for flexibility regarding the level of detail required for describing the article
 - 3rd identifier needed: dust generating process (for e.g. cutting)
- It shows that existing category system may not be suitable (TARIC), so creation of new categories and corresponding standard phrases under ESCom may be needed.