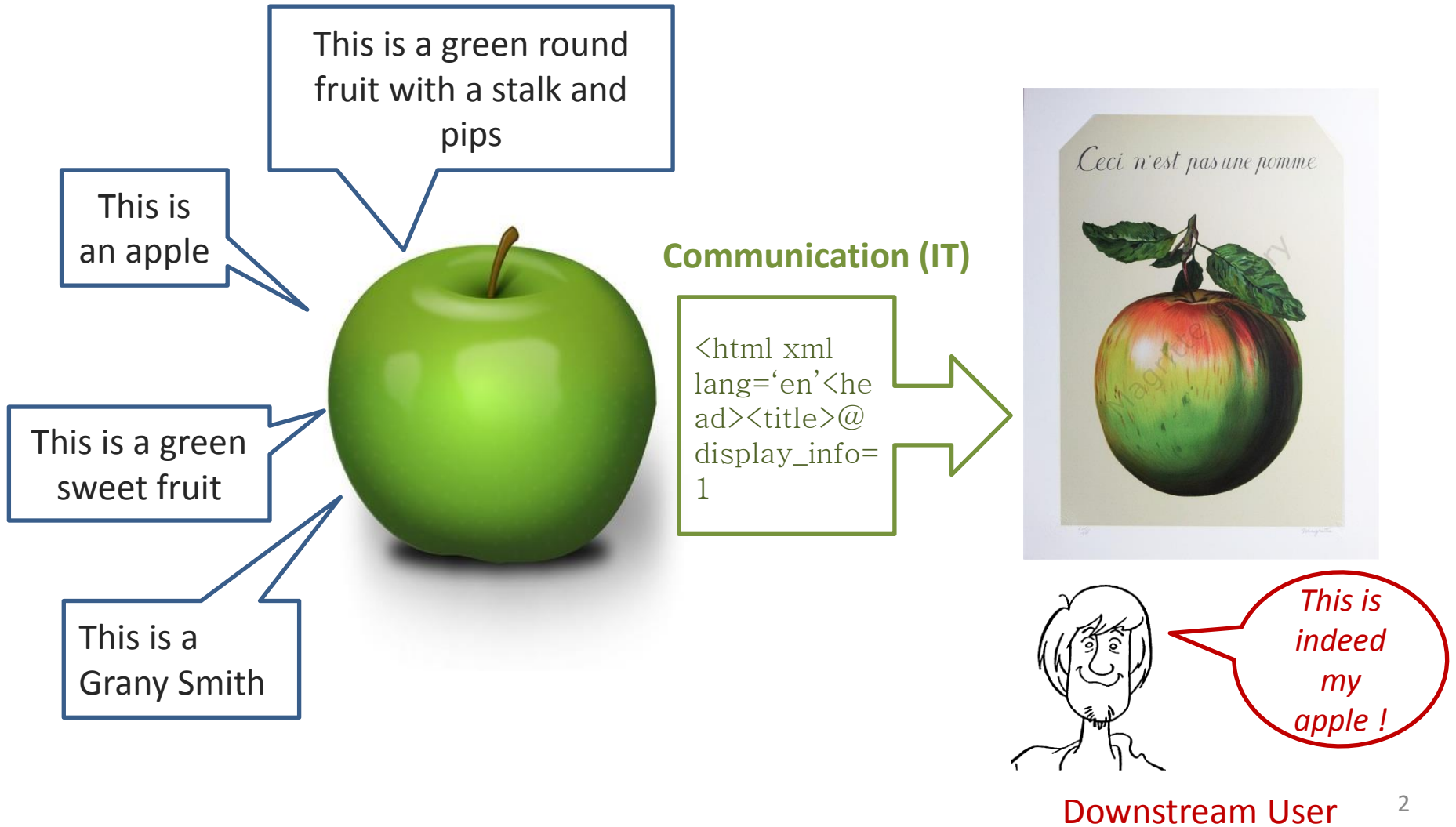# Harmonisation of ES Short Titles

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on behalf of : Cefic, DUCC, ECHA, ESCOM

ENES5 meeting

21 November 2013

Why harmonisation?

ENES4 outcome

- Action 4.2: '*Agree and promote a harmonised layout-format for the ES for communication in order to support human readers in navigating through the ES annex of SDS, including* short titles, *main sections and* table of contents'.

- ENES4: proposal for structure and rules of ES Short Titles presented
  - ➢ Comments received by ENES4 participants
  - ➢ **Follow-up:** workshop to address ENES4 feedback and refine the rules based on more examples (12 September 2013)

Principles agreed, reconfirmed at the workshop : ES Short Titles should…

- **Be readable by humans + aim for IT-processability**
- Allow DU to choose relevant ES from the extended-SDS
  - *Unambiguous*
  - *As short as possible*
- Consist of standard phrases
- Be concise and clear: not contain long lists of use descriptor phrases
- Include market description as a core element
- Use information extracted from the ES
- Be composed of a selected number of identifiers (and terms)
  1. *Life cycle stage*
  2. *Market sector information*
 3. *Additional relevant information*

The Identifiers and 'Terms' of the Structured Short Titles

1. **Life cycle stage** (pick list: 6 items)

2. **Market information** from the use descriptor, only based on PC, AC and SU*

3. **Additional information**

    3.1. **Technical function**, e.g. 'bleaching agent'

    3.2. **Technical process,** e.g. 'solvent-based process'

    3.3. **Containment**, e.g. 'closed process'

    3.4. **Physical form,** e.g. 'spray'

* Not SU3, SU10, SU21, SU22 (these are life-cycle stages)

A rule-based approach for structured short titles

Rule 1: Life cycle stage and PC/AC[4] (mandatory)
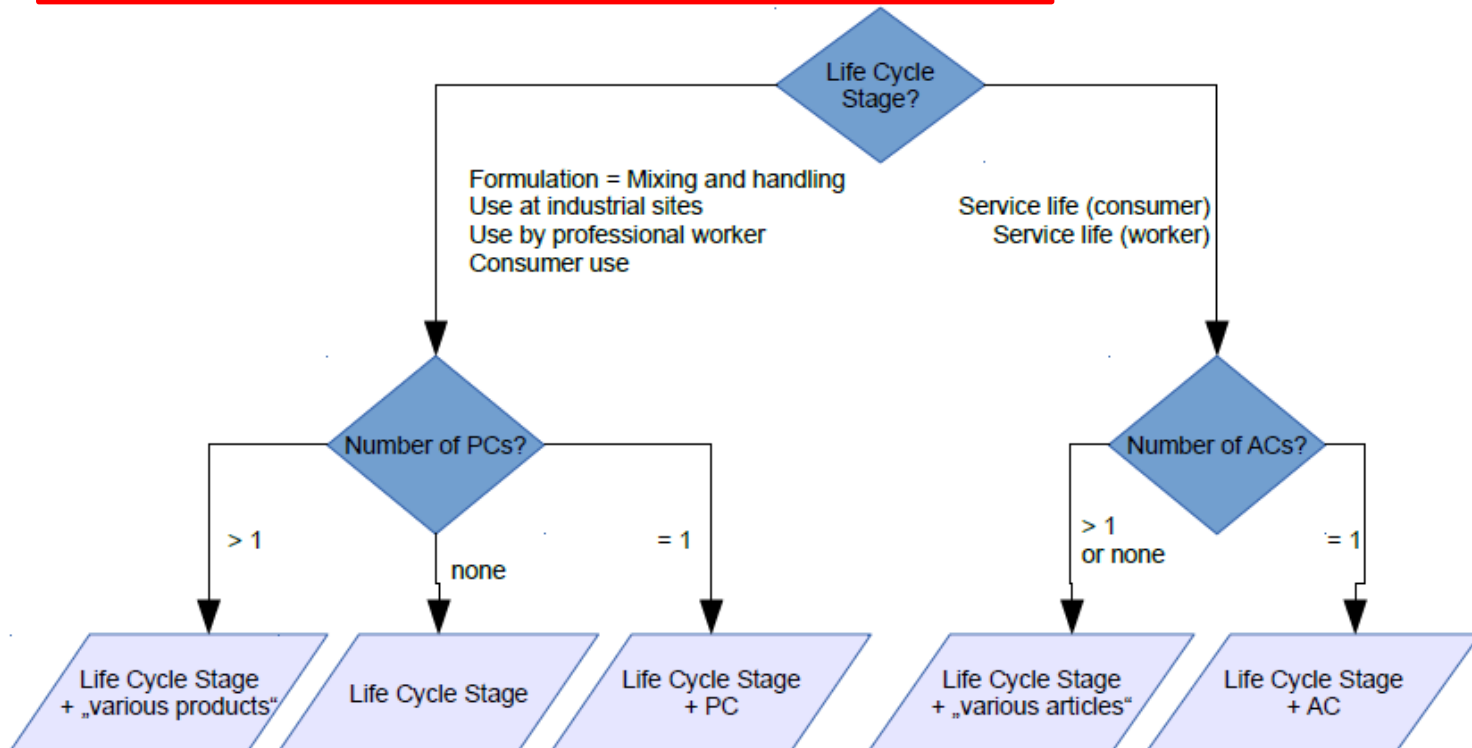
4 For PC or AC, the user can decide whether to print the codes of the use descriptors in addition to the names (when PC=1, AC=1). In the case of PC>1, AC>1, the user also has the option to add the list of codes in brackets, for example 'Various products (PC3, PC27, PC35)' if this information is deemed relevant

A rule-based approach for structured short titles

Rule 2: SU[5] (mandatory)
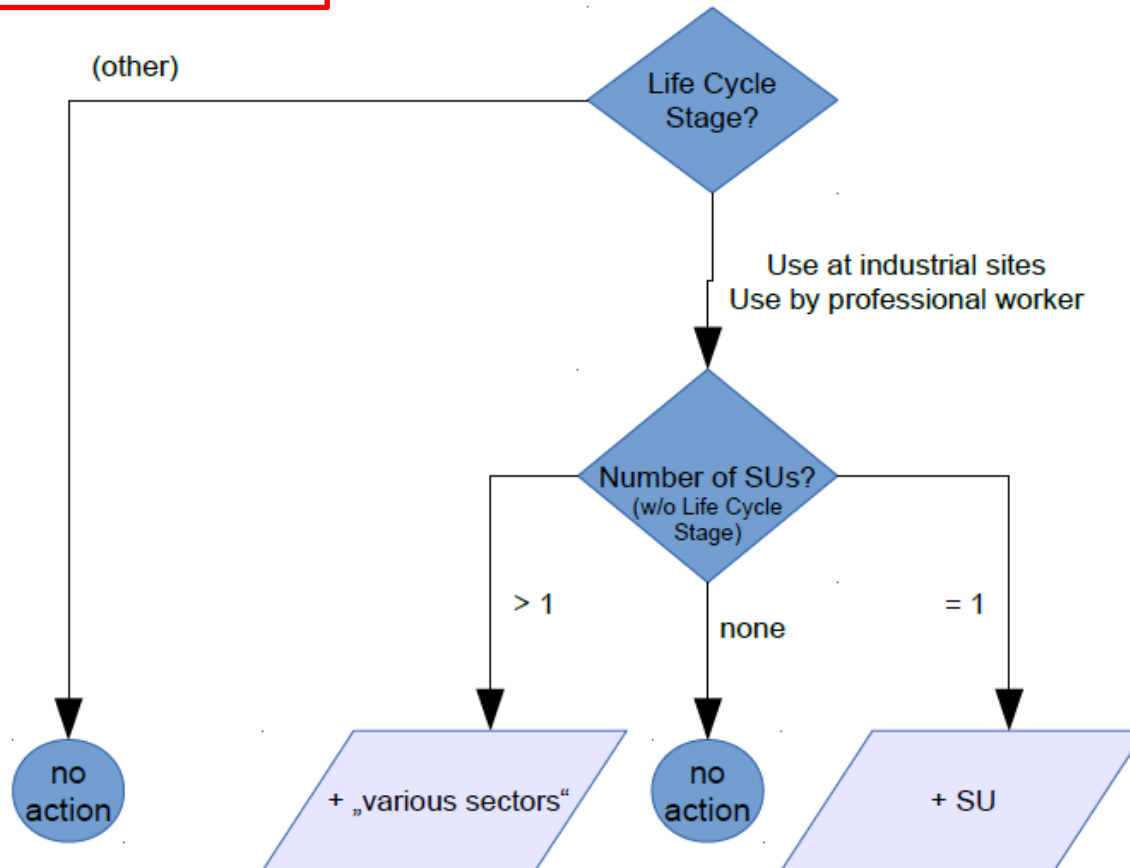
A rule-based approach for structured short titles

Additional Information: Optional

Rule 3: Technical Function

+ Technical Function

Rule 4: Physical Form

+ Physical Form

Rule 5: Technical Process

Life Cycle Stage?

(other)

Formulation = Mixing and Handling
Use at industrial sites
Use by professional worker

no action

+ Technical Process

Rule 6: Containment

Life Cycle Stage?

(other)

Formulation = Mixing and Handling
Use at industrial sites
Use by professional worker

no action
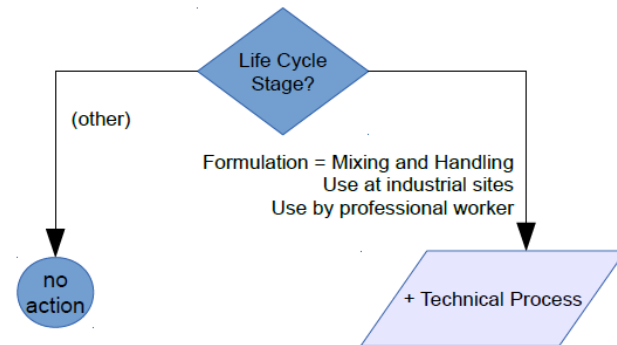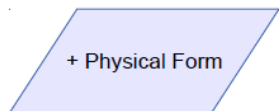
+ Containment
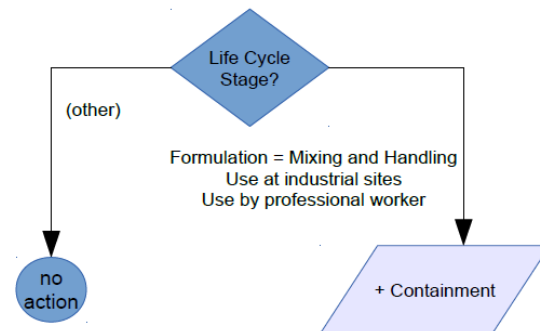
RULES TO BE FURTHER ASSESSED

Structuring ES Short Titles

- Algorithm: iterative process applies a series of rules that add a 'Term' to the Short Title

- Stop when all Short Titles are unique after application of Rules 1 and 2.

- Interim: 'manual' override in case uniqueness is not achieved or in case uniqueness is at the expense of 'human-readibility'

Examples

CURRENT ES TITLE		STRUCTURED ES SHORT TITLE FOLLOWING PROPOSED RULES	
ES title:	Use descriptors reported in title section	**ES short title proposed** **Identifier 1:** life-cycle stage *Identifier 2:* market sector Identifier3: function, process, containment, physical form	**Comments / Follow-ups**
2 Industrial use as a fuel additive	PC13	**Use at industrial sites,** *fuels* *Or* **Use at industrial sites,** *fuels* *(PC13)*	**Application of Rule 1 (+2)**

Examples

CURRENT ES TITLE		STRUCTURED ES SHORT TITLE FOLLOWING PROPOSED RULES	
ES title:	Use descriptors reported in title section	**ES short title proposed** **Identifier 1:** life-cycle stage *Identifier 2:* market sector <u>Identifier3</u>: function, process, containment, physical form	**Comments / Follow-ups**
1	Formulation and (re)packing of substances and mixtures (industrial) (washing and cleaning products, fragrances…)	SU3,10 PROC 1,2,3,5,8a,8b,9,19 ERC2 No PC No AC	**Formulation** *Or* **Formulation,** *various products*	**Application of Rule 1 (+2)**

Examples

CURRENT ES TITLE			STRUCTURED ES SHORT TITLE FOLLOWING PROPOSED RULES	
	ES title:	Use descriptors reported in title section	**ES short title proposed** **Identifier 1:** life-cycle stage *Identifier 2:* market sector <u>Identifier3</u>: function, process, containment, physical form	**Comments / Follow-ups**
3	Use of Chemical X as an electrolytic solvent in small batteries and capacitors	SU21 AC3	**Consumer use,** *Electrical batteries and accumulators* **Or** **Consumer use,** *Electrical batteries and accumulators (AC3)*	**Application of Rule 1 (+2) for article.**

Examples

CURRENT ES TITLE			STRUCTURED ES SHORT TITLE FOLLOWING PROPOSED RULES	
	ES title:	Use descriptors reported in title section	**ES short title proposed** **Identifier 1:** life-cycle stage *Identifier 2:* market sector Identifier3: function, process, containment, physical form	**Comments / Follow-ups**
4	Use as a co-formulant in plant protection products, spray applications by consumers	PC27 SU21, SU1	Consumer use, *plant protection products,* spray Or Consumer use, *plant protection products (PC27),* spray	Application of Rule 1+2. **Rule 4 applied manually ('spray': physical form).** With Rule 1 and 2 only, two ES would have the same title: spray and granules.

Examples

CURRENT ES TITLE			STRUCTURED ES SHORT TITLE FOLLOWING PROPOSED RULES	
	ES title:	Use descriptors reported in title section	**ES short title proposed** **Identifier 1:** life-cycle stage *Identifier 2:* market sector <u>Identifier3</u>: function, process, containment, physical form	**Comments / Follow-ups**
5	Formulation in batch processes with multistage and/or significant contact	SU10 PC0, PC4, PC5, PC8, PC9, PC29, PC35, PC39	**Formulation,** *various products,* <u>batch process</u>	**Application of Rule 1 (+2), and Rule 4** **Follow-up: Re-assess the Formulation Life cycle stage to make its scope clearer e.g. 'Formulation and Distribution', 'Handling and mixing'**

Examples

CURRENT ES TITLE			STRUCTURED ES SHORT TITLE FOLLOWING PROPOSED RULES	
	ES title:	Use descriptors reported in title section	**ES short title proposed** **Identifier 1:** life-cycle stage *Identifier 2:* market sector Identifier3: function, process, containment, physical form	**Comments / Follow-ups**
6	Cleaning Use in detergents in industrial settings	SU3,9 PROC1,4,7,10,13 ERC4,6b PC35	**Use at industrial sites,** *washing and cleaning products (including solvent based products)* ↓ (with proposed follow-up) **Use at industrial sites,** *cleaning products* **Or** **Use at industrial sites,** *cleaning products (PC35)*	**Application of Rule 1 (+2).** **Follow-up: shorten PC name in Use Descriptor System.** SU9 not relevant (this is not manufacturing of a substance).

Examples

CURRENT ES TITLE			STRUCTURED ES SHORT TITLE FOLLOWING PROPOSED RULES	
	ES title:	Use descriptors reported in title section	**ES short title proposed** **Identifier 1:** life-cycle stage *Identifier 2:* market sector <u>Identifier3</u>: function, process, containment, physical form	**Comments / Follow-ups**
7	Paint strippers. Drain deblockers Wide dispersive indoor and outdoor use of paint strippers and drain deblockers by professionals	SU22 PROC10,11,13 ERC8a,8b,8d,8e PC9a, 35	**Use by professional workers,** *various products(PC9a, PC35)*	**Application of Rule 1 (+2). Multiple PC case**: here, the PC codes provide additional useful information.

Examples

CURRENT ES TITLE		STRUCTURED ES SHORT TITLE FOLLOWING PROPOSED RULES	
ES title:	Use descriptors reported in title section	**ES short title proposed** **Identifier 1:** life-cycle stage *Identifier 2:* market sector <u>Identifier3</u>: function, process, containment, physical form	**Comments / Follow-ups**
8 Intermediate Manufacture of bulk large scale chemicals, fine chemicals, inorganic and organic chemicals. E.g. potassium salts, fertilisers, de-icers, pesticides, pigments, detergents, pharmaceuticals, food, products, additives, cosmetics, etc.	SU3,8,9 PROC 1,2,3,4,8a,8b ERC6a PC19	**Use at industrial sites,** *Intermediate, various sectors* *Or* **Use at industrial sites,** *Intermediate, various sectors (SU8, SU9)* ↓ (with proposed follow-up) **Use at industrial sites,** *intermediate, manufacturing of chemicals*	**Application of Rules 1 +2.** SU8 + SU9 means 'various sectors' **Follow-up: combine SU8 and SU9 into one SU descriptor:** 'manufacturing of chemicals' (it is not always clear what is fine or bulk large scale).

Follow-ups

- ENES5: Testing of IT-rules on a large number of ES for the generation of Tables of Content

CANDIDATES?

- **3rd Identifier (Rules 3 to 6)**
  - Which 'terms'/fields from the ES are relevant as 3rd Identifier
  - Define rules (order of terms)
- **Some PCs need further assessment**: intermediates, various PC
- **Automation / algorithm**: when to stop iteration? Do all rules have to be systematically applied in a given order?

Follow-ups

- At which level should ES Short Titles be agreed and assess for ambiguity? Gradually,

  – **Substance/company level**

  – **DU sectors**: **use mappings, GES titles**

  – Registrants: Joint CSR

- **ESCOM standard phrases** update process

- **Shortening of use descriptor names**

- Update of Use Descriptor System: mid-term

ES short titles – additional remarks

- Chesar will gradually implement the concept and rules for building ES short titles

- ES short titles only include information already present in the ES → Where to extract information for Third identifier on product or process characteristic?

- If an element is included in the Short title, it must be applicable to all Contributing scenarios e.g. Third identifier = 'closed process' => ALL processes are closed, consistency with operational conditions

- Suppliers must make conscious decision on scope i.e. avoid short titles giving the impression that ES has wide coverage where it is in fact limited to certain products/sectors and vice-versa

ES short titles – further developments

- Building of ES short titles may lead registrants to re-consider the original scope
  - ✓ improvement of CSA/ES scopes over time is expected
  - ✓ consistency needed between registration dossier – information in the supply chain

- ES short titles elements: further development of
  - ✓ ESCOM standard phrases catalogue (industry-led initiative)
  - ✓ Use descriptors Guidance (ECHA-led initiative under regular Guidance update process)

ES short titles – further developments

- **Short term**: companies may start to apply Short titles rules to their ES (unambiguity achieved at 'document' level i.e. each extended SDS)

- **Long term**: ES short titles developed at Consortia / DU association level:
    - ✓ harmonisation achieved at industry-wide level
    - ✓ easy-to-recognise short titles
    - ✓ training and awareness raising in parallel

    → **Further exemplification is crucial to clarify some issues and further demonstrate feasibility**