HARMONISATION OF EXPOSURE SCENARIO SHORT TITLES

Document for ENES5 meeting

Paper jointly prepared by ECHA – Cefic – DUCC – ESCOM 'ES Short Titles Group'

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OBJECTIVES FOR ENES5

The objective of this document is to present to ENES5 a proposal for a recommendation on the harmonisation of the ES short titles including the set of rules that should be followed to generate short titles supported by some illustrative examples.

The ES Short Titles Working Group seeks to achieve common understanding of the ENES community on:

- Principles agreed in relation to building and structuring ES Short Titles;
- Structure of Identifiers 1 and 2 of ES Short Titles: Life Cycle Stage and Market Sector Information respectively;
- List of outstanding questions and follow-up activities.

In addition, the ES Short Titles Working Group encourages individuals/organisations from the ENES community to nominate themselves to proceed to further testing of the ES Short Titles rules *e.g.* IT-testing of the algorithm or 'manual' translation of a Table of content including a relatively high number of existing ES Short Titles into new ES Short Titles according to the proposed structure.

BACKGROUND AND STATUS

Background

The lack of harmonisation in format and content of exposure scenarios (ES) communicated in the supply chain is widely recognised. This has been reflected in the CSA/ES Roadmap[1] action: 4.2 in connection with 2.1 and 3.3. The first Roadmap implementation plan made an explicit reference to the work on harmonisation of the short titles.

The idea of having harmonised short titles for ES has been discussed at large mainly in the context of ENES[2]. A background document was prepared for ENES4 including detailed explanations on the

[1] CSR/ES Roadmap: http://echa.europa.eu/csr-es-roadmap

[2] ENES: European Network on Exposure Scenarios: http://echa.europa.eu/web/guest/about-us/exchange-network-on-exposure-scenarios

benefits of this approach, implications and some examples. See also relevant presentations at ENES3 and ENES4:

http://echa.europa.eu/en/about-us/exchange-network-on-exposure-scenarios

- ENES3: session 'Communicating ES'
- ENES4: session 2 'Harmonising exposure scenarios for communication'

The concept was refined and further validated at a Workshop jointly organised by DUCC/AISE, ESCom/Cefic and ECHA, held in Brussels on 12 September. The set of rules for building short titles from ENES4 was further developed and subsequently tested for manual and automated application, based on real life cases.

During all the discussions there has been broad support for the concept. Its usefulness and practicability could be illustrated with various examples.

The exposure scenario short titles are expected to form the basis for the Table of Contents to be inserted at the beginning of the annex to the Safety Data Sheet. This Table of Contents will assist the downstream user in quickly identifying the exposure scenario(s) potentially relevant to him.

In the course of this project, when working on 'real-life' examples, some inconsistencies at the level of ES building have become evident. In the longer term the harmonisation of the short titles is also expected to contribute to a better definition of ES scope.

Current status

It has been concluded at previous ENES meetings that it is possible to harmonise ES Short Titles on the basis of the three groups of identifiers shown below

Identifier	**Mandatory[3] /Optional**	**Source of information**	**Number of entries**	***Example***
1. Life cycle stage	Mandatory	Main life cycle stages: Formulation, Use at industrial site, Use by professional worker, Consumer use, Service life (consumer) or Service life (worker)	1	*Consumer use*
2. Market sector information	Mandatory	PC, AC, SUs pick-lists or 'various products' or 'various sectors' or 'various articles' (+UD codes)	Multiple	*Plant protection products (PC27)*
3. Additional information on process or substance	Optional	-process characteristic -technical function of substance -level of containment -physical form of product	Multiple	*Spray*

[3] Mandatory means "information always to be entered" not mandatory in the legal sense

Some principles have also been agreed:

- Aim for IT processability whilst keeping human readability
- The ES Title should be unambiguous i.e. contain sufficient information to allow a DU to choose the relevant ES among those in the extended SDS[4].
- The identifiers will be composed of standard phrases from the ESCOM[5] Catalogue
- The ES short title should reflect a subset of information that is already included in the ES (it should not include additional information)
- Where an ES covers a broad range of products, sectors or articles, it should be possible to include "various [products], [sectors], [articles]…" in the ES Short Title, instead of a long list of phrases. The number of products/sectors/articles that would trigger the use of "various…" is still to be discussed. The user can further decide whether he would include a list of product/sector/article codes or not. E.g. Various products (PC35, PC9). The addition of codes may be of particular importance if the supplier wants to emphasize that the ES covers only a specific set of products,sectors,articles.
- Process categories (PROCs) and environmental release categories (ERCs) should not appear in the short title. The reason is that one ES usually covers various process/activities carried out by workers and thus listing these in the short title does not help to distinguish between different ES. The full list of applicable use descriptors will continue to be found in the Exposure Scenario itself, Section 1. In addition, the information content of the ERC is already largely reflected in the 1st identifier (Life cycle stage). Additional information on the processes can be provided under the 3rd identifier (e.g. containment), extracting relevant information elements from the ES content.

Besides these principles, it is also acknowledged that further testing of IT rules is needed and some follow-up activities need to be organised, namely to better define the 3rd identifier and its use.

Once the rules can be recommended for implementation a proper transition period for the completion of all follow-up activities needs to be planned. More information is provided in this paper.

STRUCTURED SHORT TITLES RULES

The draft set of rules for building and structuring short titles have been captured in this embedded document. It reflects some initial testing and provides a means for subsequently automated application and testing. Further developments of the rules are captured in the list of follow-up activities below.

[4] This verification of relevant ES does not mean that the DU is covered. Use coverage is dependent on the content of the ES, not only the short title.

[5] ESCOM stands for Exposure Scenario for Communication and it is an industry project to develop a catalogue of standard phrases for ES (http://www.cefic.org/Industry-support/Implementing-reach/Guidances-and-Tools1/)

StructuredShortTitles 20131107.pdf

EXAMPLES

A number of industry sectors and companies have applied the draft set of rules for building the short titles to some of their current exposure scenario titles. The examples provided in the embedded file below constitute a subset of all those reviewed and discussed by the ES Short Titles Working Group; this subset includes the examples that illustrate all the different rules. Further testing of the rules with real life cases will be needed, as explained in the list of follow-up activities to be planned.

ENES5 - ES short titles examples after !

LIST OF FOLLOW-UP ACTIVITIES TO BE PLANNED

The main follow-up activities can be grouped in two areas:

- Topics that need further clarification via testing of the proposed rules (manual and/or IT-testing). ***ENES participants interested in further testing are welcome to identify themselves before and during the meeting.***
- Processes that need to be put in place to support the implementation of the system

Topics for further clarification via testing

- **Third identifier (see table with identifiers on page 2)**

  One of the basic principles of the ES Short titles is that they should not include any 'new' information i.e. the different identifiers should convey only information that is already in the ES. For the life cycle stage and the use descriptors (UD), this is easier as they are in the ES title. For the 3rd identifier, more work is needed in order to map the fields in the ES into the different 3rd identifiers; only then we can define rules for the use of the 3rd identifier. Therefore it is proposed to:

  - Find which information is relevant at ES level (this will come from the testing)
  - Map which fields in the ES correspond to the selection of certain 3rd identifiers
  - Define rules for the use of the 3rd identifier

- For the short term explain through guidance how to select and use the 3rd identifier. In the long term, implement rules to deal with the use of a 3rd identifier in the short title (in order to ensure consistency).

- The order of the rules for the 3rd identifier should also be considered – is it relevant?

- **Extent of "achievable unambiguity" at different levels**

  - ES short titles within the Annex of extended SDS: in the short term it is expected that some companies implement the proposed rules to generate short titles at the level of the extended SDS for a given substance at company level.

  - in the longer-term, it is expected that an industry-wide process is put in place to agree on the ES short titles at sector level, among registrants / DU sectors. This would enable:

    - ES short titles within the joint CSR of registrants:

    - ES short titles corresponding to the use-map of a DU sector

- **Table of contents** (ToCs) built with ES short titles: prepare a few examples of current ToC vs ToC with ES short titles based on the proposed rules, to compare and assess whether ES Short Titles are fit-for-purpose of DU understanding.
- **Automation**:
  - While applying the rules when should the system stop (after the 2nd rule, or 3rd rule,…)? The testing should include the generation of two tables of contents to compare one with manual intervention and one where the system stops when "Uniqueness" is achieved. How does it work on hundreds/thousands of existing ES? Is there enough differentiation (PC/SU rules)?
  - Is it allowed to go to e.g. rule 4 (i.e. add Physical form as 3rd identifier) without applying rule 3 (Technical function)? Only if the application of the rule 3 would not introduce differentiation in the short titles?
- **Printing of codes** after 'various products', 'various sectors' or 'various articles' should be encouraged, especially when the assessment is explicitly covering only limited number of sectors/products
- How to treat **intermediates**: industry has often used PC 19 to flag that a substance is used as intermediate (i.e. 2nd identifier). However it may be also possible to express this information as technical function of the substance (3rd identifier)? Should it always be in association to SU 8/9 (manufacturing of another substance) ? Please note: SDS for Intermediates registered under Article 17 or 18 will usually do not contain exposure scenarios.

Processes that need to be put in place

- **ESCOM Standard Phrases** process:
  - New standard phrases: new phrase submission (build on existing list of phrases already identified during the work previously done), process for acceptance, update of catalogue, etc.

    - Stakeholder process for new of refined use descriptor categories (e.g. from TARIC, NACE, sector use maps), without fundamentally changing the existing list of use descriptors from the R12 Guidance.
- **Shortening of Use Descriptor Names:** working group to be set up (does this activity fit in the context of the ESCOM phrases group?)
- **Conversion of existing ES Short Titles into the proposed format**: role of Sector associations
    - Generic Exposure Scenario titles
    - Sector use mappings
- **Update of Use Descriptor System**: no fundamental change, some suggestions for consideration when next update of R-12 takes place
    - Shorter names, once agreed
    - Remove SU 3, 21,23, 10 as being redundant (already covered by Life cycle stages)
    - SU8 and SU9 combination to be considered
    - Re-assess the Formulation Life cycle stage to make clear its scope e.g. 'Formulation and Distribution', 'Handling and mixing'; in the short-term training is needed to increase awareness that Formulation covers Distribution