



ES Structured Short Titles Guidelines and next steps

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ENES 7 meeting – 18 November 2014



Background and purpose

- **Harmonisation of ES content (as communicated)**
- **ES Short Titles for Tables of Content (ToC) of ext-SDS**
 - Understandable by human readers
 - Supported by IT-systems for structured transmission in the supply chain
- **Structured Short Titles (SST)= an unambiguous ES label**
 - Fixed elements
 - Rule-based → IT algorithm to generate SST and ToC
 - Contain only a limited set of elements contained in the ES
 - Use standard phrases only
 - Concise and clear, unique within one SDS
 - Gradual replacement of free-text Short Titles
- **Complemented by ES Title Section**



Benefits of SST

- Reduce manual ES authoring work and ES maintenance
- Improve ES clarity
 - Focus on essential elements for DU screening
 - Consistency in and across supply chains
- Harmonise the presentation of ES in ext-SDS
- Indicate whether the building of ES has been done consistently
- Enable IT-processibility at DU level

Scope:

SST and ToC at the level of one SDS (one substance, one supplier)



Project steps

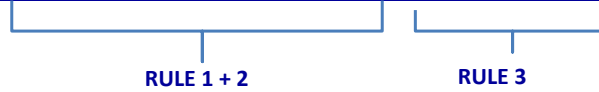
- Started 2 years ago
- Harmonisation is possible, structure and 'rules' needed
- IT compatibility / processibility requested
- Structure of Short Titles agreed in principle and tested (ENES 5)
- Rules for IT-automation drafted and tested
- Conclusions reached at ENES 6
- Publication of Guidelines: 4 November 2014





Identifiers of the Structured Short Titles

ES SHORT TITLE: Identifier 1 + Identifier 2 (+ Identifier 3)



1st Identifier: Life cycle stage – MANDATORY

from a pick-list of 6 options

2nd Identifier: Market information – MANDATORY

First PC or AC

Then SU (excluding SU3, 10, 21, 22).

Both PC/AC and SU not necessarily needed/helpful

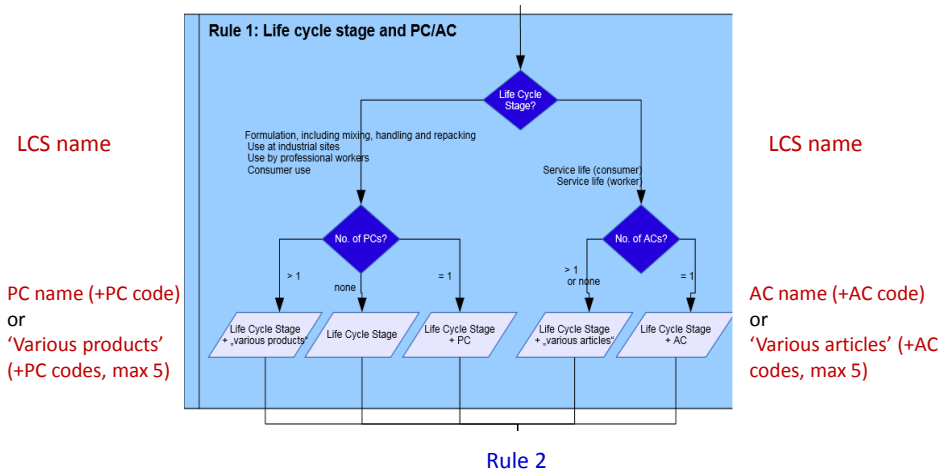
3rd Identifier: Additional information - OPTIONAL with two options identified so far

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

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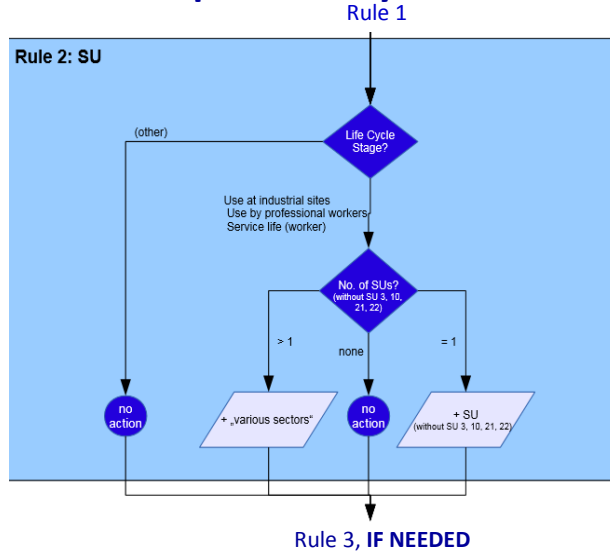


Rule 1: Life Cycle Stage (=1) and PC/AC





Rule 2: SU, complementary market information



SU name (+SU code)
OR
'Various sectors'
(+SU codes, max 5)

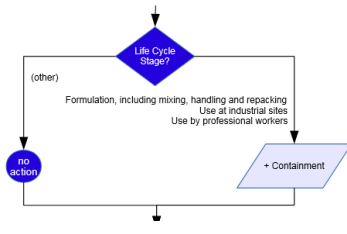


Rule 3: IF NEEDED, consistent with ES elements

- if STT are not unique within one SDS
- if deemed essential for recipient's understanding

Rule 2

Rule 3.1: Containment



Pick-list:

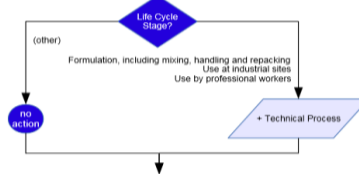
'open process'
'closed process'
Others?

Pick-list:

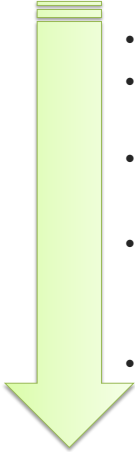
'dry process'
'solvent-based process'
'water-based process'
'processing of organic liquids'

- Order of Rules 3.1 and 3.2 can be inverted
- The additional standard phrase applied must be consistent with PROCS/ERCs

Rule 3.2: Technical Process



Default Algorithm for generating Structured Short Titles and ToC



- Algorithm: iterative process
- Applies Rules 1 and 2 to each ES within one SDS: identifiers are created and added together (standard phrases)
- Check if all SST are unique
- If 2 ES SST are 'equal', apply Rules 3.1 and 3.2 to identical STT and repeat until all STT are unique or all rules are used.
- Users can decide to apply an additional rule from Group 3 after uniqueness is achieved for the sake of understandability

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Learnings so far

- It works in many cases, since it follows life cycle stages of a substance
- In some cases, it shows that ES
 - could/should have been combined
 - should be ungrouped
 - may be incomplete e.g. Title section does not contain enough elements (PC, AC, SU and elements for Rule 3 if needed)
- 3rd Identifier Rules and standard phrases proposed (pick-lists) to be further tested
- At DU level: the Structured Short Title is an indication that a use may be covered, a detailed assessment of the ES itself should always be conducted

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Examples: STT

CURRENT ES TITLE		ES STRUCTURED SHORT TITLE
ES title:	Use descriptors reported in title section	ES short title
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 including mixing, handling, repacking.
Formulation in batch processes with multistage and/or significant contact	SU10 PC0, PC4, PC5, PC8, PC9, PC29, PC35, PC39	Formulation including mixing, handling, repacking; <i>Various products.</i>
Industrial use as a fuel additive	PC13	Use at industrial sites; <i>Fuels (PC13).</i>
Use of Chemical X as an electrolytic solvent in small batteries and capacitors	SU21 AC3	Consumer use; <i>Electrical batteries and accumulators (AC3).</i>
Use as a co-formulant in plant protection products, spray applications by consumers	PC27 SU21, SU1	Consumer use; <i>Plant protection products (PC27).</i>



Example STT

CURRENT ES TITLE		ES STRUCTURED SHORT TITLE
Cleaning Use in detergents in industrial settings	SU3,9 PROC1,4,7,10,13 ERC4,6b PC35	Use at industrial sites; <i>Washing and cleaning products (including solvent based products) (PC35).</i>
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; <i>Various products(PC9a, PC35).</i>
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; <i>Intermediate; Various sectors (SU8, 9).</i>
Consumer use of propellants	SU 21 PC1,3,4,8,9a,24,39 ERC 8a, 8d	Consumer use; <i>Various products.</i>
Distribution of substance (Methyl ethyl ketone, CAS 78-93-3)	SU3 SU8 SU9	Formulation including mixing, handling, repacking.

Example: Table of Content

(Annex III of Guidelines, Example 2)

CURRENT ES TITLE	ES STRUCTURED SHORT TITLE
ES 1 Manufacture SU 3, SU8; SU9; SU12; PC19, PC20, PC21, PC32, PC35, PC39; PROC1, PROC2, PROC3, PROC4, PROC5, PROC8a, PROC8b, PROC9, PROC15, PROC24; ERC1	Not for communication
ES 2 Formulation, liquid SU 3, SU 10; PC28, PC29, PC35, PC39; PROC1, PROC2, PROC3, PROC4, PROC5, PROC8a, PROC8b, PROC9, PROC13, PROC14, PROC15, PROC19; AISE 10; ERC2	ES1 - Formulation, including mixing, handling and repacking; Various products; Water-based process.
ES3 Formulation, solid SU 3, SU 10; PC28, PC29, PC35, PC39; PROC1, PROC2, PROC3, PROC4, PROC5, PROC8a, PROC8b, PROC9, PROC13, PROC14, PROC15, PROC19; ERC2, AISE 1	Formulation, including mixing, handling and repacking; Various products; Dry process. Or Contributing scenario of previous ES?
ES4 Industrial use, Washing and cleaning products (including solvent based products), liquid SU 3, PC3, PC8, PC31, PC35, PROC2, PROC3, PROC4, PROC5, PROC7, PROC8a, PROC8b, PROC9, PROC10, PROC13, PROC19; ERC4; ESVOC 8	ES2 - Use at industrial sites; Various products (PC3, PC8, PC31, PC35).
ES5 Industrial use, Washing and cleaning products (including solvent based products), solid SU 3, PC3, PC8, PC31, PC35, PROC2, PROC3, PROC4, PROC5, PROC7, PROC8a, PROC8b, PROC9, PROC10, PROC13, PROC19; ERC4; ESVOC 8	Contributing scenario of previous ES?
ES6 Industrial use, Plant protection products SU 3, SU1; PC12, PC27; PROC3, PROC5, PROC8a, PROC8b, PROC9, PROC11; ERC8d	ES3 - Use at industrial sites; Various products (PC12, PC27).

.../...

Example: Table of Content

.../...

CURRENT ES TITLE	ES STRUCTURED SHORT TITLE
ES7 Industrial use, Manufacture of textiles, leather, fur SU 3, SU5; PC23, PC24, PC34; PROC3, PROC4, PROC5, PROC6, PROC7, PROC8a, PROC8b, PROC9, PROC10, PROC11; PROC13, PROC15, PROC17; ERC2	ES4 - Use at industrial sites; Various products (PC23, PC24, PC34); Manufacture of textiles, leather, fur (SU5).
ES8 Industrial use, Manufacture of plastics products, including compounding and conversion SU 3, SU12; PC20, PC21, PC32, PROC3, PROC4, PROC5, PROC8a, PROC8b, PROC9, PROC15, ERC6d; ESVOC 44.	ES5 - Use at industrial sites; Various products (PC20, PC21, PC32); Manufacture of plastics products, including compounding and conversion (SU12).
ES9 Industrial use, Adhesives, sealants SU 3, PC1; PROC2, PROC3, PROC4, PROC5, PROC8a, PROC8b, PROC9; PROC10, PROC15; PROC19; PROC25; ERC6a; FEICA 2	ES6 - Use at industrial sites; Adhesives, sealants (PC1).
ES10 Professional use, Formulation, liquid SU 22, SU 10; PC28, PC29, PC35, PC39; PROC1, PROC2, PROC3, PROC4, PROC5, PROC8a, PROC8b, PROC9, PROC14, PROC15, ERC2 AISE 11	ES7 - Use by professional workers; Various products (PC28, PC29, PC35, PC39).
ES11 Professional use, Formulation, solid SU 22, SU 10; PC28, PC29, PC35, PC39; PROC1, PROC2, PROC8a, PROC3, PROC8b, PROC4, PROC9, PROC5, PROC14, PROC15, ERC2 AISE 2	Contributing scenario of previous ES?
ES12 Professional use, Washing and cleaning products (including solvent based products), liquid SU 22, PC14, PC15, PC35, PROC1, PROC2, PROC3, PROC4, PROC8a, PROC8b, PROC9, PROC10, PROC11; PROC13, PROC15, PROC19; ERC8a	ES8 - Use by professional workers; Various products (PC14, PC15, PC35).

.../...

Example: Table of Content

.../...

CURRENT ES TITLE	ES STRUCTURED SHORT TITLE
ES13 Professional use, Washing and cleaning products (including solvent based products), solid SU 22, PC14, PC15, PC35, PROC1, PROC2, PROC8a, PROC3, PROC8b, PROC4, PROC9, PROC10, PROC11; PROC13, PROC15, PROC19; ERC8a	Contributing scenario of previous ES?
ES14 Professional use, Adhesives, sealants SU 22, PC1; PROC2, PROC3, PROC4, PROC5, PROC8a, PROC8b, PROC9, PROC10, PROC15, PROC19; PROC25; ERC8a FEICA 11	<i>ES9 - Use by professional workers; Adhesives, sealants (PC1).</i>
ES15 Professional use, Leather tanning, dye, finishing, impregnation and care products, Textile dyes, finishing and impregnating products, including bleaches and other processing aids SU 22, PC23, PC34; PROC8a, PROC8b, PROC10, PROC11; PROC13, ERC8d	<i>ES10 - Use by professional workers; Various products (PC23, PC34).</i>
ES16 Professional use, Biocidal products (e.g. Disinfectants, pest control) SU 22, SU1; PC8, PROC10, PROC11, PROC13, ERC8a	<i>ES11 - Use by professional workers; Biocidal products (e.g. Disinfectants, pest control) (PC8); Agriculture, forestry, fishery (SU1).</i>
Professional use, Plant protection products SU 22, SU1; PC12, PC27; PROC8b, PROC11; ERC8d	<i>ES12 - Use by professional workers; Various products (PC12, PC27); Agriculture, forestry, fishery (SU1).</i>
ES17 Consumer uses, Washing and cleaning products (including solvent based products), liquid SU 21; PC35, ERC8a	<i>ES13 - Consumer use; Washing and cleaning products (including solvent based products) (PC35).</i>

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Example: Table of Content

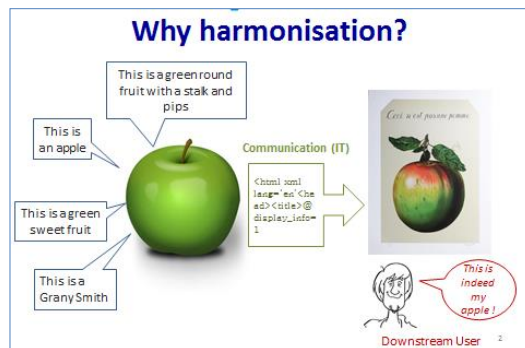
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CURRENT ES TITLE	ES STRUCTURED SHORT TITLE
ES18 Consumer uses, Washing and cleaning products (including solvent based products), solid SU 21; PC35, ERC8a	Contributing scenario of previous ES?
ES19 Consumer uses, Cosmetics, personal care products SU 21; PC39; ERC8a, COLIPA 17	<i>ES14 - Consumer use; Cosmetics, personal care products (PC39).</i>
ES20 Consumer uses, Adhesives, sealants SU 21; PC1; ERC10b	<i>ES15 - Consumer use; Adhesives, sealants (PC1).</i>
ES21 Consumer uses, Textile dyes, finishing and impregnating products; including bleaches and other processing aids SU 21; PC34; ERC11b	<i>ES16 - Consumer use; Textile dyes, finishing and impregnating products; including bleaches and other processing aids (PC34).</i>
ES22 Industrial use, Metal surface treatment products, including galvanic and electroplating products SU 3, PC14, PROC5, PROC8a, PROC8b, PROC9, PROC10, PROC24; ERC4; ES 24	<i>ES17 - Use at industrial sites; Metal surface treatment products, including galvanic and electroplating products (PC14).</i>

Implementation and transition

- **IT providers can start implementing rules**
- **Transition – IT systems**
 - ES Structured Short Title field foreseen in ESCOM XML
 - In parallel , ‘free-text’ short titles can co-exist
- **Alignment with ESCOM**
 - ESCOM XML
 - ESCOM Phrases: addition of standard phrases related to STT
- **Alignment with Guidance Update (e.g. use description)**
 - Shortening PC, AC and SU names
 - Addition /complement with other selected codes (e.g. NACE, UCN, TARIC)
 - Some specific wording from the pick-lists may be modified
- **Feedback on proposal for 3rd Identifier and agreement on specifics**
 - To: ducc.coordination@gmail.com

IT'S TIME FOR IMPLEMENTATION...



Thank you for your attention