Revision of EU Ecolabel Criteria for Lubricants

EUEB February 2018 - Summary of final changes

Joint Research Centre
the European Commission’s in-house science service

JRC Science Hub: ec.europa.eu/jrc
Content

1. Overview of the revision process
2. Summary of legal ACT and main changes after AHWG2
3. Summary of criteria proposal (legal ANNEX) and main changes after AHWG2
4. Discussion
Overview of the revision process

1. AHWG1: 9th February 2017

2. AHWG2: 9th and 10th October via webinar (consultation closed on 31st October)

3. February 2018: TR3.0 publication + EUEB final presentation + open online consultation last possibility to provide comments to the revised criteria proposal (no later than by Friday 16th February 2018)

4. April 2018: TR4.0 for ISC

5. June 2018: Vote in RegCom
Legal ACT
Scope and definitions

- The existing five product categories + new added in this revision (Metalworking fluids and Temporary protection against corrosion) were restructured into 3 main categories (TLL, PLL and ALL) according to the potential of the lubricant to be released to the environment during use.

- Definitions of the lubricants covered were included.
- Reference to the ISO 6743 families introduced in order to better define the families included in each main category.
- Definitions section - further completed with other relevant terms like: specific definitions for lubricant types (e.g. chainsaw oils, wire rope lubricants, etc.) and terms related to biodegradability and aquatic toxicity.

After AHWG2:

- No substantial changes
- Minor changes in the wording in Article 1 and Article 2 for clarification.
Article 1

The product group ‘lubricants’ shall comprise any lubricant falling within the following 3 main sub-groups and their corresponding lubricant categories:

Total Loss Lubricants (TLL) sub-group: chainsaw oils, wire rope lubricants, concrete release agents, open gear oils, stern tube oils, total loss lubricating greases and other total loss lubricants.

Partial Loss Lubricants (PLL) sub-group: 2-stroke oils, temporary protection against corrosion and partial loss lubricating greases.

Accidental Loss Lubricants (ALL) sub-group: hydraulic systems, metalworking fluids, closed gear oils and accidental loss lubricating greases.

Article 2

1. For the purpose of this Decision, the following definitions shall apply:

(1) ‘lubricant’ means a product capable of reducing friction, adhesion, heat, wear and corrosion when applied to a surface or introduced between two solid surfaces in relative motion and capable to transmit power. The most common ingredients are base fluids and additives.

(2) ‘Base fluid’ means a lubricating fluid whose flow, ageing, lubricity and anti-wear properties, as well as its properties regarding contaminant suspension, have not been improved by the inclusion of additive(s);
Legal ANNEX
General assessment and verification

(a) Requirements

- Relevant changes:
  - Specific reference to the standard for testing and calibration laboratories (General requirements for the competence of testing and calibration laboratories (ISO/IEC 17025:2005)) and to the principles of Good Laboratory Practice (GLP)
  - Clarification: intentionally added substances and/or formed intentionally after any chemical reaction
  - For the purpose of this Decision, impurities stated in the SDS should be treated as intentionally added substances (existing UM).

(b) Measurement thresholds

- Text simplified - thresholds indicated within each criterion.
Legal ANNEX
Criterion 1 – Excluded or limited substances

- Ambition level was raised in first proposal based on horizontal approach
- Partial alignment with Blue Angel was presented in the second proposal as a compromise approach

Changes after AHWG2:
It has been specified in the criteria text that the compliance is required for intentionally added or formed at or above relevant concentrations

1 (a) Hazardous substances
(ii) Substances – Based on Blue Angel approach and assessment of LuSC List information and the current licenses data, the allowed concentration limit for substances classified with selected hazards have been slightly relaxed to a maximum concentration of:
  - 0.5 x Final product classification limit or
  - Final product classification limit (current limit in force).
Legal ANNEX
Criterion 1 – Excluded or limited substances

Changes after AHWG2:

1 (c) Substances of very high concern (SVHCs)
reverted to the current limit \((at \ or \ above \ the \ concentration \ of \ 0.010\%)\)

Assessment and verification

- Substantial changes in the structure of the text with the aim to make clear the evidence to be provided (SDS of intentionally added substances/mixtures and their concentration in the final product)

- Added: "The above evidence can also be provided to Competent Bodies directly by the ingredient suppliers"
Legal ANNEX
Criterion 2. Aquatic toxicity

- **Ambition level was raised in first proposal** based on the assessment of current licences

**Changes after AHWG2:**

- No changes in the ambition level
- Relevant **changes in the structure of the text** to make clear the applicable toxicity data needed in each case (i.e. when existing data can be used or when tests needs to be performed, the possibility to fill data gaps, etc.)
Legal ANNEX

Criterion 3. Biodegradability and bioaccumulative potential

- **Ambition level was raised in first proposal** based on the assessment of current licences

**Changes after AHWG2:**

- **Thresholds slightly relaxed** only for **TLL greases**
- **Log Kow** finally set in 8 (instead of 10 as initially proposed)
- Minor **wording clarifications**
Legal ANNEX
Criterion 4. Raw materials

**DELETED**

- First and second proposal: Expanding the scope to other raw materials

**Changes after AHWG2 and EUEB consultation:**

- The deletion of this criterion opens the scope to all lubricants that are able to comply with criteria 1, 2 and 3, and renewability is not limiting the suitability of a lubricant to be awarded with EU Ecolabel.

This **technology neutral approach** promotes development of new technologies in the lubricant industry.
Legal ANNEX
Criterion 4. Origin, traceability and advertising of renewable ingredients

- Criterion on origin and traceability of vegetable oils (NEW in TR1.0)
  → third party certification of renewable ingredients

Changes after AHWG2 and EUEB consultation:

- Relevant changes:
  - **If renewable ingredients are used** – reporting is requested on the origin and certification schemes used if relevant.
  
  - **Minimum percentage of certified material** for palm oil and palm kernel oil as well as their derivatives

  - Additional requirement – compliance with CEN/TR 16227:2011 standard, in case **term 'bio' is used** in the product (aligned with Blue Angel).
Legal ANNEX

Criterion 5. Packaging (NEW in TR1.0)
Criterion 6. Minimum technical performance
Criterion 7. Consumer information (NEW in TR1.0)
Criterion 8. Information on EU Ecolabel

- First proposal:
  - NEW criteria on packaging and consumer information regarding disposal.
  - Revised criteria on Minimum technical performance and Information on EU Ecolabel considering the overall changes in the scope and criteria set

- Second proposal: Criteria proposals further defined. Minor changes
Legal ANNEX

Criterion 5. Packaging (NEW in TR1.0)
Criterion 6. Minimum technical performance
Criterion 7. Consumer information (NEW in TR1.0)
Criterion 8. Information on EU Ecolabel

Minor changes after AHWG2:

- **Criterion 5.** Packaging → minimum 25% of recycled plastic is kept. Additional wording clarifications.
- **Criterion 6.** Minimum technical performance → wording clarification especially to better define the assessment and verification (fit for purpose and OEM approval defined)
- **Criterion 7.** Consumer information → wording clarified and pictograms allowed as Blue Angel
- **Criterion 8.** Information on EU Ecolabel → wording amendment according to suggestions during the revision + proposal to display the % of certified renewable ingredients
Comments/suggestions/questions from EUEB members are welcome
Thanks for your attention

Contact: Candela Vidal-Abarca Garrido & Renata Kaps

Tel. +34 954 48 71 92
e-mail: JRC-IPTS-LUBRICANTS@ec.europa.eu