Revision of EU Ecolabel Criteria for Lubricants

EUEB November 2017

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

JRC Science Hub: ec.europa.eu/jrc
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1. **AHWG1**: 9th February 2017

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

2. **TR3.0 currently under preparation**

3. February 2018: TR3.0 publication + EUEB final presentation + open online consultation last possibility to provide comments to the revised criteria proposal

4. April 2018: TR4.0 for ISC

5. June 2018: Vote in RegCom
Scope and definitions

- The existing five categories have been restructured into **3 main categories** (TLL, PLL and ALL) according to the potential of the lubricant to be released to the environment during use.
  - **Metalworking fluids** are kept in the revised scope and have been included in the ALL category.
  - **Temporary protection against corrosion** also are kept in the revised scope and have been included in the PLL category.
  - **4T engine oils** are finally **withdrawn** in order to maintain the existing identity of the label and the original revision timeline.

- Minor changes in the **wording** of the product group definition.
- **Definitions of the lubricants covered** have been included.
- Reference to the ISO 6743 families has been introduced in order to better define the families included in each main category.
- **Complementary definitions section** has been 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.
### Product group name:
Lubricants

### Second revised product group definition proposal:
A lubricant means a **product** capable of reducing friction, adhesion, heat, wear and corrosion when introduced between two solid surfaces in relative motion and capable to transmit power. The most common **ingredients** are base fluids and additives.

### Second revised scope proposal:
**Total Loss Lubricants (TLL):** chainsaw oils, wire rope lubricants, concrete release agents, open gear oils, stern tube oils, total loss greases and other total loss lubricants.

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

**Accidental Loss Lubricants (ALL):** hydraulic systems, metalworking fluids, closed gear oils and accidental loss greases.
Criteria second proposal (i)

Criteria on **toxicity and biodegradability:**

- Criterion 1. Excluded or limited substances
- Criterion 2. Aquatic toxicity
- Criterion 3. Biodegradability and bioaccumulative potential

- Ambition level was raised in first proposal based on horizontal approach (criterion 1) and assessment of current licences (criteria 2 and 3)

- Second proposal: Minor changes
Criteria second proposal (ii)

Criteria on raw materials:

- Criterion 4. Raw materials
- Criterion 5. Origin and traceability of vegetable oils (NEW in TR1.0)

- First proposal: Scope widening to other raw materials
  + NEW criteria on third party certification of renewable ingredients

- Second proposal: Criteria proposals further defined
Criteria second proposal (iii)

Criteria on other aspects:

- Criterion 6. Packaging (NEW in TR1.0)
- Criterion 7. Minimum technical performance
- Criterion 8. Consumer information (NEW in TR1.0)
- Criterion 9. Information on EU Ecolabel

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

- Second proposal: Criteria proposals further defined. Minor changes
Criterion 1. Hazardous substances (1)

- **Ambition level** of Criterion 1: Excluded or limited substances and mixtures has been **significantly raised** compared with the valid EU Ecolabel criterion 1.

- Existing criterion 1 applies to **product level** (i.e. there is a **general derogation** for classified substances present in the final product below the sum concentration that would trigger mixture classification).

- A strict application of article 6(6) and 6(7) → **drastic loss of licences**, according to the information received from the industry and CBs.

- Seeking **harmonisation** with other product groups → a **compromise criterion proposal** has been discussed with involved stakeholders.
Criterion 1. Hazardous substances (2)

i.e. following the **Blue Angel approach**: EU Ecolabel "horizontal threshold" of 0.01% per substance in the final product applies to substances classified with H statements of higher concern (e.g. H400 and H410); while higher concentration are allowed for H statements of lower concern (e.g. H411).

- Compared to the horizontal approach, this approach would have a **lower impact on the current licences, but** on the other hand is **much stricter then the currently valid one.**
Criterion 4: Raw materials and Criterion 5: Origin and traceability of renewable raw material (1)

- **Existing Criterion 5:** Renewable raw material is controversial, as there is no absolute evidence which supports biobased alternatives as superior environmental options.

- Blue Angel dropped the criterion on renewability in the last revision (2014) because of this reason.

**Second revised proposal:**

- Existing criterion 5 on renewable raw material was **extended to other non bio-based raw materials**, that can be partly or totally of petrochemical origin, provided they **good biodegradability and low toxicity** (e.g. synthetic lubricants, as PAOs, PAGs, synthetic esters): **Criterion 4: Raw materials**

- **(NEW) Criterion 5:** Origin and traceability of renewable raw material proposed in the TR1.0 which requires the renewable raw material content to be third party certified was further defined.
Criterion 4: Raw materials and Criterion 5: Origin and traceability of renewable raw material (2)

Main feedback in the AHWG2:

- **General agreement to extend to other alternatives** in order to keep a technology neutral approach. Difficulties exist in explicit listing under the scope all available and possible new technologies in the criterion text.
- Third party certification on bio based raw material would pose and **extra burden to renewable compare to non-renewable alternatives**.
- **Difficulties on the implementation of criterion 5**: lack of availability of certified raw material in the market, NGO side claimed lack of credibility of schemes included in the proposed text and impact on current licences.

Additional information:

- **Blue Angel and US-VGP**: it does NOT require a minimum % of renewable raw materials
- **Swedish Standard**: It does require a minimum % of renewable raw materials.
Criterion 4: Raw materials and Criterion 5: Origin and traceability of renewable raw material (3)

Potential approaches to follow:

Criterion 4: Raw materials

• **Option A**) Keep revised Criterion 4: raw materials aims to promote best raw material available in terms of **low toxicity and biodegradability according to evidence** and industry data.

• **Option B**) Delete Criterion 4 as this will "indirectly" allow all alternatives able to comply with **criteria 1 to 3 on toxicity and biodegradability**.

• **Option C**) Keep the current criterion focused exclusively on renewable raw material.
Criterion 4: Raw materials and Criterion 5: Origin and traceability of renewable raw material (4)

Potential approaches to follow:

**Criterion 5: Origin and traceability of renewable raw materials**

- **Option A)** Keep Criterion 5: Origin and traceability of renewable raw material for a **small share** of the renewable raw material sourced.

- **Option B)** **Delete Criterion 5**: Origin and traceability of renewable raw material **to avoid additional burden** on bio-based alternatives and due to the potential **difficulties to be implemented and potential drop of licences**.

- We are assessing the feedback received in the last consultation.

Although we consider the criterion on Origin and traceability of renewable raw materials as relevant, we came to the conclusion that still there is **lack of data to support a solid proposal in this revision process**.
i. Hazardous substances criteria
Alignment to Blue Angel? Yes/No

ii. Raw material criteria
criteria 4 on raw materials:
• Option A) Keep revised Criterion 4: raw materials aims to promote best raw material available in terms of **low toxicity and biodegradation** according to evidence and industry data.
• Option B) Delete Criterion 4 as this will "indirectly" allow all alternatives able to comply with criteria 1 to 3 on toxicity and biodegradability.
• Option C) Keep the current criterion focused exclusively on renewable raw material.
criterion 5 on origin and traceability of renewable raw materials.
• Option A) Keep Criterion 5 for a **small share** of the renewable raw material sourced.
• Option B) Delete Criterion 5. to avoid additional burden on bio-based alternatives and due to the potential **difficulties to be implemented and potential drop of licences**.
Thanks for your attention

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