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The Hague, 23 February 2017

Reference : LUBR/17.027/IV/cl
Subject : European Ecolabel Lubricants Letter of Compliance (*Octopol MB*)

Dear Mr. Vanderlip,

By means of this letter we would like to confirm that your additive Octopol MB of TRCC meets the relevant EU Ecolabel criteria for Lubricants (Commission Decision 2011/381/EU, valid until 31 December 2018). If used as a single component, this additive qualifies for application in final products, eligible for EU Ecolabel certification. A 'final product' includes any of the product categories defined in the current EU Ecolabel criteria document.

All substances intentionally added in the additive have been taken into account in this evaluation. These substances fulfil criterion 1b and 2 of Commission Decision 2011/381/EU regarding the exclusion of specific substances.

The classification of the package in terms of aquatic toxicity and biodegradability/bioaccumulation is based on the substance in the package characterized by the worst environmental performance (worst case approach).

The environmental criteria of the Commission Decision 2011/381/EU allow a limited percentage of substances in the end product (lubricant), which have not been included in this assessment. These chemical substances are present in end products in concentrations lower than 0.1% and higher than 0.010%. The table presented below provides information on the content of substances included in the package, but not fully assessed. This information and the maximum treat rate support formulators of lubricants in calculating the actual percentage of not-assessed substances in the formulation of end products.

Please note that topping up an additive package may lead to incompliance to the criteria of Commission Decision 2011/381/EU.

The maximum treat rate is valid only if no other substance with the same or worse EU Ecolabel classification is present in the final product.

Table 1. Lubricant Substance Classification list (LuSC-list)

TRCC

The list is a non-limitative list. Companies are not obliged to use one of these substances or brands but if used the EEL classification can be used directly on the application form without requesting the underlying documents. The list consists of two parts. Part 1 consists of substances and part 2 consists of brands. These are commercially available brands and are therefore indicated by their commercial name.

Part 2: Brands

Brand name ^a	Proposed maximum treat rate ^b %					Based on 100% treat rate			Remarks	Assessed by	Valid till
	Cat 1	Cat 2	Cat 3	Cat 4	Cat 5	EEL Biodegradation ^c A/B/C/X/- ^e	EEL Aquatic Toxicity ^d D/E/F/G/(M) ^f / ^e	Renewability			
Octopol MB	5%	25%	5%	10%	5%	99% C	100% D	0%	Dutch CB	31 December 2018	

- a) Substances that are excluded by the ecolabel criteria according to Criterion 1b and 2 are not present above 0.010% in the final composition.
- b) The treat rate is usually set by the supplier before the assessment.
- c) In case classification of the biodegradation has not been set at 100% but at a smaller fraction, e.g. 30%, then the total fraction with the specific classification is equal to the fraction of the treat rate multiplied by the indicated fraction of the classification; e.g. 0.6% (applied treat rate) * 80% C (assessed fraction of biodegradation) is equal to 0.48% C. The value of 0.48% must be filled in in the application form for the brand name on biodegradation. The fraction not assessed on biodegradation is then automatically 0.60 - 0.48 = 0.12%.
- d) In case the classification of the aquatic toxicity has not been set at 100% but at a smaller fraction, e.g. 30%, then the total fraction with the specific classification is equal to the fraction of the treat rate multiplied by the indicated fraction of the classification, e.g. 0.6% (applied treat rate) * 80% E is total of 0.48% E for the brand name. The value of 0.48% must be used in the application form. The fraction unassessed on aquatic toxicity is then automatically 0.60 - 0.48 = 0.12%.
- e) -- means that it was not necessary to assess the substance(s) in the lubricant based on the stated maximum treat rate and the 0.1% limit in the ecolabel criteria for biodegradation, aquatic toxicity and renewability.
- f) M = Multiplication factor for a substance that has an acute aquatic toxicity classified as very toxic (G).