

Tentative Specification for ‘Lubricants’

April 2019

Background

In April of 2018 a tentative specification for Lubricants was released by the Interagency Subcommittee. Comments on the tentative specification were received from the American Chemistry Council who had concerns regarding the encouragement to not use lubricants containing fluorinated chemicals, concerns over the use of hazard lists (such as proposition 65 and the AOEC database) and requesting changes to the definitions and specification sections regarding formaldehyde.

In response to these comments, the following changes were made to the specification:

- A background section was added, and the information on the types of chemicals that are contained in lubricants was moved from the specification section to this section;
- Additional information was added to the background section regarding the health concerns related to fluorinated non-stick compounds;
- Definitions were added for Environmental Product Declaration (EPD) and Health Product Declaration (HPD) statements to support the addition of EPDs and HPDs as an encouragement;
- A definition was added for Perfluorinated Chemicals (PFCs);
- Formaldehyde was not removed from the examples of asthmagens because it is listed in the AOEC database and is an example of an asthmagen, so its use is appropriate;
- The specification section was reorganized and revised as follows:
 - The certification standards were organized into a hierarchy (multi-attribute certifications are encouraged more than single-attribute)
 - An encouragement to use products that have an EPD or HPD was added;
 - The word “must” was changed to “should” to make it clear that all of the specification requirements are encouragements.

No changes were made to the encouragement that the product should not contain fluorinated non-stick compounds, however the word “shall not” was changed to “should not” to make it clear that this is an encouragement and not a ban or prohibition.

The use of hazard lists such as Proposition 65 and the AOEC database were not removed from the specification because the use of these lists is an encouragement and is not a prohibition or ban, and it was felt that the lists are an easy to use and helpful screening tool that allows the specification to include single attribute certifications that do not screen for material hazards.

Based on the changes made to the tentative specification, it is recommended that the revised tentative specification be re-released as tentative.