

NYCO
att. of Mr. Gregory Boudevillain
66 avenue des Champs-Élysées
BP 414 – 75366 Paris Cedex 08
FRANCE

The Hague, 30 July 2020

Reference : LUBR/20.059/IV/nb
Subject : European Ecolabel Lubricants Letter of Compliance Nycobase SMP EL,
Nycobase SNG EL, Nycobase 8103 EL, Nycobase 8306 EL, Nycobase 8318S
EL, Nycobase 8361 EL, Nycobase 8397 EL, Nycobase 8311 EL and
Nycobase 8345 EL

Dear Mr. Boudevillain,

By means of this letter we would like to confirm that your base fluids, Nycobase SMP EL, Nycobase SNG EL, Nycobase 8103 EL, Nycobase 8306 EL, Nycobase 8318S EL, Nycobase 8361 EL, Nycobase 8397 EL, Nycobase 8311 EL and Nycobase 8345 EL meet the relevant EU Ecolabel criteria for Lubricants (Commission Decision 2018/1702/EU, valid until 31 December 2024). If used as a component, these base fluids qualify for application in final products, eligible for EU Ecolabel certification, up to their maximum treat rate. A 'final product' includes any of the product categories defined in the current EU Ecolabel criteria document.

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.

All substances intentionally added to the base fluids have been taken into account in this evaluation. These substances fulfil criterion 1 of Commission Decision 2018/1702/EU regarding the exclusion of specific substances.

The classification of your products in terms of aquatic toxicity and biodegradability/bioaccumulation is based on all substances and assessed conforming to a worst environmental performance (worst case approach).

The environmental criteria of the Commission Decision 2018/1702/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 also 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 non-compliance to the criteria of Commission Decision 2018/1702/EU.

We welcome the development of more additives compliant to EU Ecolabel, and look forward to assessing them. We trust that this *Letter of Compliance* adds to the success of your products.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'G.G.P. Dröge', written over a horizontal line.

G.G.P. Dröge
director

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

Company

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

Part 2: Brands

Brand name ^b	Maximum allowed treat rate ^c						If less than 100% see ^d or ^e		Biobased fraction ^{h,i}	Fraction of PO/PKO ^{h,j}	CB Assessed	Valid till
	ALL (No Grease)	ALL (Only Grease)	PLL (No Grease)	PLL (Only Grease)	TLL (No Grease)	TLL (Only Grease)	EEL Biodegradation ^d	EEL Aquatic Toxicity ^e				
							A/B/C/X/- ^f	D/E/F/G(M ^g)/- ^f				
Base fluidsⁱ												
Nycobase 8103 EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	83%	RSPO	Dutch	31 December 2024
Nycobase 8318S EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	88%	RSPO	Dutch	31 December 2024
Nycobase 8306 EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	84%	RSPO	Dutch	31 December 2024
Nycobase 8361 EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	56%	RSPO	Dutch	31 December 2024
Nycobase 8397 EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	50%	RSPO	Dutch	31 December 2024
Nycobase 8311 EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	78%	RSPO	Dutch	31 December 2024
Nycobase 8345 EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	86%	RSPO	Dutch	31 December 2024
Nycobase SMP EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	95%		Dutch	31 December 2024
Nycobase SNG EL	Not limited by biodegradation and aquatic toxicity						100%A	100%D	89%		Dutch	31 December 2024

- a) In case the data on the LuSC-list are different from that of its corresponding valid LoC, the valid LoC is binding.
- b) Substances that are excluded by EU decision 2018/1702/EU according to Criterion 1 are not present above 0.010% in the final composition.
- c) The treat rate is usually set by the supplier before the assessment. Highest treat rate is applied in case the additive may possess different functions. **The same or a lower treat rate for ANOTHER function does not alter its final EEL classification but in the ecolabel application form the correct function must be stated.**
- d) 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 applied by the applicant 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%.
- e) 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 applied by the applicant 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%.
- f) – 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.
- g) M = Multiplication factor for a substance that has an acute aquatic toxicity classified as very toxic (G).

- h) Related to Criterion 4 of the EU decision 2018/1702/EU
- i) bio-based fraction must be larger than >25% based on valid C-14 method. If the bio-based fraction is not established yet but renewable fraction based on C-counting method is >50%, the entry will indicate *n.d.* indication that the bio-based fraction has not been established yet.
- j) The fraction of PO/PKO is indicated here. If nothing is stated it means that the company has declared that Palm oil or Palm kernel oil is not used in the manufacturing process and therefore no PO/PKO is present. If stated e.g. *RPSO* it indicates that the company has stated that this is the complete fraction of Palm oil or Palm Kernel oil applied in the product AND that the company has a valid RSPO certificate at the time of application. If stated e.g. *50%NC (Not Certified)* it indicates that the company of the applicant has stated that 50% of the mass of the based fluid originates from palm oil or palm kernel oil, that this is the complete fraction of Palm oil or Palm Kernel oil applied in the product but the company cannot submit a valid RSPO certificate or any other relevant certificate.