

NYCO
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France

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The Hague, 10 December 2013

Reference : LUBR/13.150/IV/cl
Subject : European Ecolabel Lubricants Letter of Compliance

Dear Mr Lucazeau,

With this letter we confirm that the following base fluid listed below is conform the European Ecolabel criteria for Lubricants (Commission Decision 2011/381/EU, valid until 24 June 2015), and that they, when used as a single additive, qualify for use in a final product eligible for the European Ecolabel. With 'final product' we mean here any of the product categories defined in the current European Ecolabel criteria document.

All substances intentionally added in the additive package have been taken into account for this evaluation and 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 with the worst environmental performance (worst case approach).

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

We welcome the development of more additives in compliance with the European Ecolabel, and hope your product will be successful.

Sincerely yours,



Ms. R.N.M. van der Sijp
Director

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

Nyco, France

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			
Nycobase 8103	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	78.6%	Dutch CB	24 June 2015	
Nycobase 8311	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	83.1%	Dutch CB	24 June 2015	
Nycobase 8318S	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	86.1%	Dutch CB	24 June 2015	
Nycobase STM	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	90.0%	Dutch CB	24 June 2015	
Nycobase 8345	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	83.1%	Dutch CB	24 June 2015	
Nycobase 8306	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	83.1%	Dutch CB	24 June 2015	
Nycobase 8812	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	83.1%	Dutch CB	24 June 2015	
Nycobase 8361	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	56.3%	Dutch CB	24 June 2015	
Nycobase 8397	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	Not limited by biodegradation and aquatic toxicity	100%A	100%D	50.0%	Dutch CB	24 June 2015	

- 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).



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