



Joint position paper on Lithium salts harmonized classification and labelling proposal

Following the proposal by ANSES (on behalf of the French MSCA) in June 2020 for harmonized classification (CLH) for reproductive toxicity category 1A – H360FD, for lithium carbonate, lithium chloride and lithium hydroxide, ATIEL, the Technical association of the European lubricants industry, together with the UEIL and the ELGI, is raising some concerns about the appropriateness of the proposed dossier.

The three associations are supporting the technical arguments that have been submitted during the consultation, notably by FUCHS the lead registrant of lithium 12-hydroxystearate and by Lithium REACH consortium. We indeed question the selection of the studies and the read-across performed.

This classification would have a severe impact on the lithium-based greases which are of major importance in multiple applications in Europe, such as the operation of all wind turbines, ensuring the performance of most of the industrial machines that use electrical motors, aircraft lubrication (including landing gear), and numerous automotive parts such as wheel bearings, which are just a few applications that are key to society. Replacement of Li-based greases would result in performance loss, lower levels of machine availability, higher greenhouse gas emissions and a substantial volume increase of resource-demanding grease type products helping to meet the goals of the new green deal.

Lithium hydroxide is used as raw material, acting as a starting material together with a fatty acid to manufacture the thickener in the production of greases.

The fatty acids used for the reaction are normally derived from natural sources with typical compositions but a certain range of variability from batch to batch. This may result in a slight excess of lithium hydroxide after the reaction in certain batches to meet the desired grease properties.

If the final concentration of Lithium Hydroxide exceeds the classification threshold for toxicity for reproduction Cat. 1A or 1B, the final grease will be classified accordingly. The application of the conservative calculation method (assuming presence of Lithium Hydroxide above 0.3% in general) would lead to an over-classification in most of the cases.

Lithium based greases are the most widely used greases in Europe, at approximately 70 % of the grease used (2019 NLGI Annual production Survey).

Lithium based greases have been used safely over the last decades, and we question such a proposal that could be detrimental for investments in the sector.

We would appreciate a careful review and assessment of the current French proposal by ECHA and other member states' competent authorities with these considerations being brought forward.



About the signatories:

- **The Technical Association of the European Lubricants Industry (ATIEL)** is a non-for-profit association (ASBL) representing the combined knowledge and experience of leading European and international engine oil manufacturers and marketers. By drawing on the technical know-how of its membership, ATIEL promotes consensus on key technical, product stewardship and sustainability issues, ensuring that engine oils continue to contribute to improved wear protection, deposit control, lower emissions, and fuel economy CO2 emissions efficiency.
- **The Union of the European Lubricants Industry (UEIL)** is the umbrella association representing more than 35 associations and 450 companies covering the entire lubricants' value chain, from manufacturing and distribution to recycling. Our mission is to support informed policymaking by educating EU stakeholders about the value and benefit of the lubricants industry for Europe's economy, society, and the environment.
- **The European Lubricating Grease Institute (ELGI)** established in 1989 is an independent, self-governing institute, financed solely by members. It is a group of scientific and technical institutes active in the field of tribology dealing with lubricating greases and associated products.