



## UEIL's vision for an effective and efficient REACH revision

The lubricants industry, as part of the chemicals sector, will play a pivotal role in delivering a clean and competitive future for Europe by driving innovation, sustainability, and economic growth. The recent announcement of the new Chemicals Industry Package under the Clean Industrial Deal underscores the strategic importance of the chemicals sector, recognising it as the “industry of industries.” At the heart of this package lies the targeted revision of the REACH Regulation, which offers an opportunity to create a truly effective chemicals management system that will enable Europe to deliver its strategic priorities and a competitive future, while maintaining high standards of safety and environmental protection.

Key to the success of Europe’s industry, manufacturing and transportation systems, lubricants play a central role in delivering a clean and competitive European economy by reducing friction and emissions in articles with moving parts, increasing energy efficiency and improving machine lifespans.

As a representative of over 450 companies (mainly SMEs) covering the entire lubricants value chain, from manufacturing and distributing to recycling and regeneration, the Union of the European Lubricants Industry (UEIL) is committed to ensuring that the REACH revision creates an enabling environment for the continued growth and sustainability of our sector. In this position paper, UEIL outlines key recommendations to ensure that the revision supports the sector's contribution to a cleaner, more competitive European industry.

### Yes to targeted simplification to allow more predictability, streamline processes and support SMEs

Yes to a clearer upfront pathway towards authorisation or restriction

Yes to an exposure-based approach

Yes to manageable and proportionate requirements for the lowest tonnage bands to create a level-playing field for SMEs

### No to superficial simplification that will lead to an ineffective and burdensome REACH

No to overly simplistic, unenforceable and unscientific grouping  
Yes to regulatory effectiveness and efficiency

No to Generic Risk Approach (GRA) for professional  
Yes to reduced administrative burden

No to an indiscriminatory Mixture Allocation Factor  
Yes to a targeted management of harmful combined exposures

No to polymer registration in REACH  
Yes to an efficient REACH that supports Europe’s clean industrial competitiveness



## **1. Yes to targeted simplification to allow more predictability, streamline processes and support SMEs**

- ***YES to a clearer upfront pathway towards authorisation or restriction***

The pathway towards either authorisation or restriction should be decided up front in a formal process according to the properties, uses and exposure of the substance, and taking into account both hazard and risk, as well as the EU's strategic objectives. This would improve the implementation of the current system, create more regulatory certainty for industry and ensure the effective protection of health and the environment. This would also lead to the integration of the One Substance One Assessment philosophy into REACH, limit the use of overly simplistic essential use criteria and streamline processes. UEIL also believes that a dynamic link between SVHC and authorisation should be avoided to better differentiate between hazard and risk.

- ***YES to an exposure-based approach***

In the lubricants industry, customers tend not differentiate between exposure risk and hazard. So, to avoid risk assessments they often reject critical substances or products containing critical substances even if they do not pose any risk for the users in the respective application.

A more exposure-based approach to the REACH regulation, including a specific risk assessment (SRA) which takes into account the specific exposure scenarios and the use of the substances, is a practical solution that would help our customers handle hazardous products safely and would avoid the industry implementing counterproductive measures.<sup>1</sup>

- ***YES to manageable and proportionate requirements for the lowest tonnage bands to create a level-playing field for SMEs***

SMEs in the lubricants industry often produce specialty lubricants, which are produced in smaller quantities. In order to allow these companies to compete on a level playing field, the REACH revision should ensure that requirements for the lowest tonnage bands are realistic, manageable and proportionate so that new developments in speciality lubricants are not priced out of the market. This includes ensuring that there is no additional testing for these bands.

---

<sup>1</sup> For example, to address customer concerns over hazard classifications in water miscible metal working fluids, manufacturers can dilute soluble lubricants with water. However, this is counterproductive to the EU and UEIL's shared sustainability ambitions as it leads to higher volumes of packaging and increased shipping emissions, and does not reduce the risk of the product.



## 2. No to superficial simplification that will lead to an ineffective and burdensome REACH

- **NO to overly simplistic, unenforceable and unscientific grouping,**  
**YES to regulatory effectiveness and efficiency**

Although managing chemicals through grouping may appear to be a solution to increase regulatory efficiency, it often has the opposite effect. Grouping does not always consider the scientifically-proven properties of the grouped substances, and hence cannot always be justified.

Furthermore, such grouping would also be difficult to enforce if the substances are not properly identified. For example, if group identifications do not provide individual EC and CAS numbers, it would be difficult for companies, and especially SMEs, to assign substances to a group.

The universal PFAS restriction proposal is an example of how an overly broad grouping can slow down the regulatory process, create uncertainty for businesses and industry, and have unintended effects on Europe's strategic priorities.

Moreover, although grouping harmonised classification and labelling (CLH) in CLP may simplify the regulatory process, it does not always consider the actual properties of each substance (or each sub-group) in the grouped substances. Less dangerous substances might be unnecessarily classified, which would pose a major challenge for lubricants manufacturers because possible alternatives may not be available when classified products are rejected by customers.

Therefore, to regulate and manage chemicals effectively, it is essential to use grouping only to a very limited extent on both sides (registrants and the regulatory body). An overly simplistic approach to chemicals management risks causing more harm to citizens, the environment and the EU's competitiveness.

- **NO to Generic Risk Approach (GRA) for professional uses**  
**YES to reduced administrative burden**

Professional and industrial users of lubricants, such as those in manufacturing, maintenance, and other industrial settings, already have robust risk management practices in place, often guided by specific health, safety, and environmental regulations tailored to their particular industry.

Imposing GRA requirements on professional users would create unnecessary complexity, burdening businesses—particularly SMEs when GRA leads to bans on uses—with additional administrative costs and regulatory hurdles. Furthermore, the existing systems, including Safety Data Sheets (SDS) and the professional knowledge and training that these users already possess, provide adequate safeguards to ensure that chemicals, including lubricants, are used safely and responsibly.



- **NO to an indiscriminatory Mixture Allocation Factor (MAF)**  
**YES to a targeted management of harmful combined exposures**

MAF should not be seen as a pragmatic simplification tool. Evidence is pointing more and more to legacy chemicals driving concern for unintentional mixtures<sup>2</sup>, integrating MAF in REACH would therefore excessively increase the regulatory burden without proving an effective way of managing harmful combined exposures. This is why UEIL recommends that MAF should not be integrated in REACH, and that harmful combined exposures should be tackled in targeted legislation.

- **NO to polymer registration in REACH**  
**YES to an efficient REACH that supports Europe's clean industrial competitiveness**

The lubricants industry currently benefits from a wide range of polymers on the market, maximising the choice of properties. Polymers are commonly used in the industry as defoamers and viscosity modifiers in both pastes and liquid products. Furthermore, the industry has put in place robust systems to limit releases into the environment during use and in the waste stage.

High MW polymers are different from low MW molecules (such as monomers), so the current registration system and data-requirements cannot be applied as such to polymers. The monomers (which make up polymers) are already managed by current REACH legislation, and the additional inclusion of new notifications and/or registration requirements for the 200,000-400,000 polymers currently on the EU market in REACH would lead to redundancies, inefficiencies and an unmanageable burden for ECHA and companies, especially SMEs.

Furthermore, it could also lead to unintended effects for Europe's clean industrial competitiveness as lubricants producers may no longer be able to choose the best polymer for its required use, which could lead to reduced energy efficiency and shorter lifespans for machinery and transport.

### **About UEIL**

*UEIL represents the interests of the lubricants industry in Europe, with a special focus on SMEs and independent companies that produce lubricants and metal processing fluids essential for the automotive and industrial sectors.*

*Through its 34 members, UEIL covers the whole lubricants' value chain, from manufacturing and distribution to recycling, and represents over 450 companies and 100,000 employees.*

*Our members' collective expertise provides an unrivaled source of information and knowledge on and for the lubricants' industry, and establishes UEIL as the principal interlocutor of the EU Institutions in areas such as health & safety, environment, recycling, access to technical information, technical specifications, taxation and industry statistics.*

---

<sup>2</sup> [Risk from unintentional environmental mixtures in EU surface waters is dominated by a limited number of substances - ScienceDirect](#)