



UNITI Bundesverband  
mittelständischer  
Mineralölunternehmen e. V.

## UNITI Portrait

UNITI Bundesverband mittelständischer Mineralölunternehmen e.V., founded in 1927, is the German association of small- and medium-sized mineral oil companies. UNITI provides a wide range of expertise in the fields of fuels, lubricants and heating oil, and represents around 90% of SME mineral oil companies in Germany.

The majority of independent SME lubricant manufacturers and distributors in Germany are members of the association. Its market share is approximately 50%. With their highly innovative automotive and industrial lubricants as well as metal working fluids, UNITI members are indispensable partners to the manufacturing industry and ensure the highest technological standards. UNITI also represents the majority of manufacturers and distributors of additives for fuels, lubricants and heating oil.

4.5 million customers visit petrol stations run by UNITI member companies every day. Association members operate 120 petrol stations on federal highways and around 6,000 road petrol stations, which constitute over 40% of German road-based petrol stations. With approximately 3,700 independent petrol stations, UNITI members represent almost 75 percent of the independent service stations in Germany.

UNITI members supply about 20 million people with heating oil, one of the most important energy carriers in the heating market. Around 80% of the overall market in light heating oil and solid fuel is served by association members. Nowadays, renewable energy sources as well as gas and electricity belong to their range of products, too. The share of the liquefied petroleum gas market held by UNITI members is about 42%.

The approximately 1,300 member companies of UNITI achieve an annual total turnover of around 35 billion euros and employ about 80,000 people in Germany.

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## UNITI information

Lubricants – Demanding requirements  
for manufacturing and distribution

Made in Germany



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The legal regulations concerning the manufacturing and distribution of lubricants, as well as standards and customer requirements have significantly increased over the past few years and become stricter. This information flyer provides an overview of the various requirements that are met by small- and medium-sized lubricant companies in Germany. Companies need to comply with the continually growing requirements while paying particular attention to the following European, national and international guidelines and provisions:

- REACH<sup>1</sup>: Registration and availability of additives for lubricants; SVHCs<sup>3</sup> and substance regulations, safety data sheet and exposure scenarios
- CLP<sup>2</sup>: Classification and labelling of lubricants and their components; changes and tightening of requirements; labels in customers' national languages
- Product notifications in Germany and Europe for emergency health response/poison information centres

- Hazardous substances and water legislation: Stricter requirements for plants manufacturing, handling and storing raw materials and lubricants; determining the water hazard classes in line with the new German ordinance AwSV<sup>5</sup>
- Legal requirements in non-EU states concerning chemicals: different national implementation of GHS<sup>4</sup>; national registrations and consideration of substance lists
- Standards and product-specific requirements for lubricants; approvals; quality monitoring and quality management systems
- Increasing requirements for automotive and industrial lubricants, and especially metal working fluids, as well as bio and food-grade lubricants

Some topics are explained exemplary in more detail.

See footnotes <sup>1</sup> <sup>2</sup> <sup>3</sup> <sup>4</sup> <sup>5</sup> for abbreviations.

## REACH

Substances manufactured within or imported to the EU in quantities of 1 tonne or more per year must be registered by no later than 31 May 2018 in accordance with the REACH regulation. This also applies to components and additives for lubricants. The expense of registration inevitably leads to higher costs for raw materials and can restrict the availability of specific additives. Furthermore, lubricant components successfully in use for many years, like for example boric acid, have been evaluated by the European Chemicals Agency as SVHCs, and the list of SVHCs is continually expanded. Due to customer expectations, SVHCs are, partly, substituted by alternative components. The substitution of additives and reformulation of chemical compositions caused by REACH results in significantly increased efforts and higher costs in research and development.



## CLP

Lubricants must be classified and labelled as a mixture according to the new European CLP regulation for health hazards, physical hazards or environmental hazards since 1 June 2015. Due to the changed classification criteria in comparison with the former law and often stricter classified additives, various lubricants are classified for the first time as hazardous or into a stricter category according to CLP. This requires new identification using CLP labels or costly conversion of labels. For example, the classification criterion for aspiration hazard is significantly stricter under CLP meaning that many lubricants must now be labelled as aspiration toxic. In other legal areas, too, CLP leads to necessary adjustments: due to stricter CLP classifications and changes of assessment criteria according to the new AwSV ordinance, higher water hazard classes may result for substances and mixtures, which can lead to stricter requirements for facilities and increased expenses.



## Lubricants

In addition to the effects of REACH and CLP already mentioned, there are also strict occupational protection provisions to be complied with, particularly with regard to the manufacturing and use of industrial lubricants – primarily for metalworking fluids/cooling lubricants. Water-miscible metal working fluids are additionally affected by the European biocidal products regulation. Biocides are generally used to prevent microbial contamination and control microbe growth in water-mixed cooling lubricant systems. The new biocidal products regulation, however, has greatly restricted the number of biocides available. Moreover, the European Chemicals Agency has classified the first most frequently used formaldehyde releasers in cooling lubricants as carcinogenic. Biocides in metal working fluids used successfully for many years are thus subject to strong pressure towards cost-intensive substitution.



## Standards, specifications and quality management



Longer oil change intervals, new aggregates and materials, as well as the need for energy saving are leading to ever-increasing demands on lubricants. In many cases, industrial specifications on their own are insufficient for meeting the requirements. Increasing numbers of additional in-house specifications must be met, which causes lengthy and costly approval processes required by the vehicle and aggregate manufacturers. These specific requirements lead to increased product variety, which causes significantly higher development and storage costs. Additional burdens include ever-shortening product cycles and the increasingly extensive requirements of industrial lubricant users with respect to the quality management systems which must be evidenced.

**Made in Germany:** Besides increasing raw materials and development costs the German lubricant companies have to facilitate high investments and personal resources in order to meet the stricter requirements arising from legal regulations, standards and customers. This is a considerable burden, especially for small- and medium-sized enterprises (SMEs), but on the other hand it offers also opportunities. The high levels of flexibility and innovation within lubricant SMEs enable them to quickly react to new requirements and to offer high-quality products to their customers.

UNITI actively supports its members by representing their interests on a political level, as well as expert consultancy and providing the latest information on new and amended legal regulations, standards and specifications. Furthermore, members may benefit from a versatile and tailored choice of seminars covering specific lubricant topics as well as chemicals and environmental legislation.

<sup>1</sup>REACH = Registration, Evaluation and Authorisation of Chemicals <sup>2</sup>CLP = Classification, Labelling and Packaging of substances and mixtures

<sup>3</sup>SVHC = Substances of Very High Concern <sup>4</sup>GHS = Globally Harmonised System of classification and labelling of chemicals

<sup>5</sup>AwSV = German ordinance on facilities handling substances hazardous to water