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|  | EUROPEAN COMMISSION  JOINT RESEARCH CENTRE  **Institute for Prospective Technological Studies (Seville)**  Sustainable Production & Consumption Unit |

**EU Ecolabel Lubricants**

Substitution information and Derogation request form

**1. Common information requirements**

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| **To be treated as confidential?** | Yes No |

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| **Contact name** |  |
| **Organisation** |  |
| **Email** |  |
| **Telephone No.** |  |
| **Supplementary documents attached** | *Please list additional evidence provided* |

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| **1a. Chemical substance name(s)** |  |
| **1b. CAS, EC or Annex VI numbers** | *The CAS No shall always be provided* |
| **1c. Current EU regulatory status** | *E.g. notified, on or proposed for the SVHC candidate list, registered, authorised* |
| **1d. CLP Classifications from the EU Ecolabel hazard listing** | *Please specify the source and evidence for the classification(s).* |
| **1e. Proportional contribution to final product classification (for mixture ingredients)** | *This is relevant for mixtures where the CLP rules shall be used to classify the final product mixture.* |
| **1f. Existing scientific evidence and risk assessments relating to the substance** | *E.g. REACH dossiers, ECHA evaluations, peer reviewed scientific research/screening exercises.* |
| **1g. Functional need and significance to the final product** | *What technical function does it provide and why is it needed? The need for the substance to be present in the product shall be detailed based on specific consumer requirements or standards.* |

**2. Additional information required for derogation requests**

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| **2a. The relevance of the hazard classification(s) along the life cycle of the product (e.g. manufacturing, use, disposal)** | *Where the risks of exposure to the hazard may occur e.g. workforce exposure, wastewater release, consumer exposure. Scientific evidence relating to risks of exposure.* |
| **2b. Market availability of alternatives and the potential for substitution** | *Market availability and technical status of alternatives – why are they currently not suitable? This shall be substantiated with technical evidence* |

**3. Additional information required about substitutes**

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| **3a. Comparative evaluation of environmental performance** | *Identification of substances that can/have been substituted and supporting evidence of the improvement for specific hazards i.e. CLP classifications, reference to scientific research/screening exercises.* |
| **3b. The relevance of the hazard substitution along the life cycle of the product (e.g. manufacturing, use, disposal)** | *Evidence of where the greatest improvement potential along the lifecycle can be detected e.g. through reduced workforce exposure, wastewater release, consumer exposure.* |
| **3c. Compliance with product performance and functional requirements** | *Verifiable evidence that the substitute fulfills the same functional requirements and technical needs e.g. fitness for use test results, specifications* |
| **3d. Market diffusion and technical maturity** | *Evidence of the market availability and technical maturity of substitute(s)* |