

Complex Chemistry

A Technical Review of
VLS Investigations:
2013 – 2023





Protecting you and your customers

www.ukla-vls.org.uk

As an independent body, VLS protects you by verifying the claims made on lubricants.

This means you can be assured that the engine oils used in your customers' vehicles can meet the claims being made.

If you have any concerns about a lubricant product, report them to us on
01442 875922 or **admin@ukla-vls.org.uk**



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1. Introduction

The Verification of Lubricant Specifications is an independent organisation providing a credible and trusted means to verify lubricant specifications, bringing transparency to the lubricant marketplace and protecting and educating the end user.



Alan Outhwaite,
*Chairman, VLS Technical
Review Panel*

Back in 2013, the Verification of Lubricant Specifications (VLS) was formed amid concerns that some lubricant products were being sold with claims that did not seem to be believable. Closer inspection found that occasionally sub-standard formulations were being passed off as the latest specifications or even failing to perform effectively. The vast majority of lubricants sold in the UK market at the time were fully compliant. However, out of this concern, reputable lubricant blenders and manufacturers came together to launch VLS.

Since then, VLS has investigated ninety different lubricant complaints from cold weather properties through to compliance with industry standards and market regulations. Over the years, the types of cases that VLS has handled have changed, and it has adapted to reflect the needs of the market. This White Paper highlights the types of cases that have been investigated over the past ten years, and the learnings gleaned, in the context of an increasingly complex lubricants market.

“When VLS was first formed in 2013, there was clearly a lack of understanding in some areas of the marketplace. VLS is confident that ten years later, the message around compliance is being heard. Lubricant blenders, manufacturers and distributors alike know that they will be held to account by VLS to ensure that lubricants are correctly described and really can deliver what they claim. But as the industry evolves, a recent influx of cases shows that there is still work to be done to ensure an open and fair marketplace that end users can have confidence in.”

2. Case Analysis

To date, VLS has investigated 90¹ cases of complaints regarding lubricants.

The vast majority of these cases have related to passenger vehicle engine oils

This indicates not only the size of the Passenger Vehicle (PV) market in comparison to other sectors but also the level of complexity required to accurately serve this consumer-orientated market.

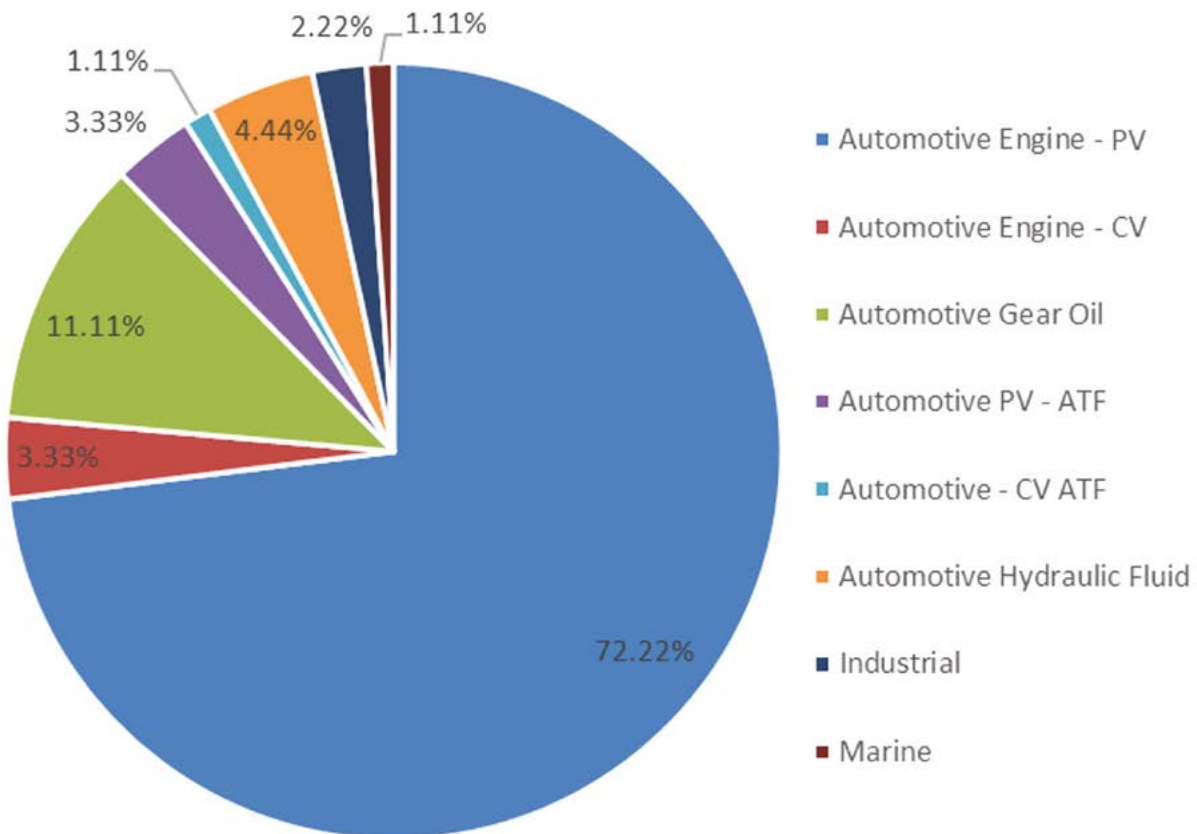


Figure 1: VLS case summary by product type 2013-2023

It is important to note that VLS has investigated cases in industrial and marine products as well as automotive products. Although the demand has been far lower, the fact that the demand exists demonstrates the need for an independent trade

body that can cover all these different aspects of the lubricants industry. Over the past twelve months, the diversity of cases received has been greater than ever before, as awareness of VLS extends across all aspects of the UK lubricants industry.

¹ As at end of June 2023

Non-compliance with stated specifications is the most frequent cause of complaint

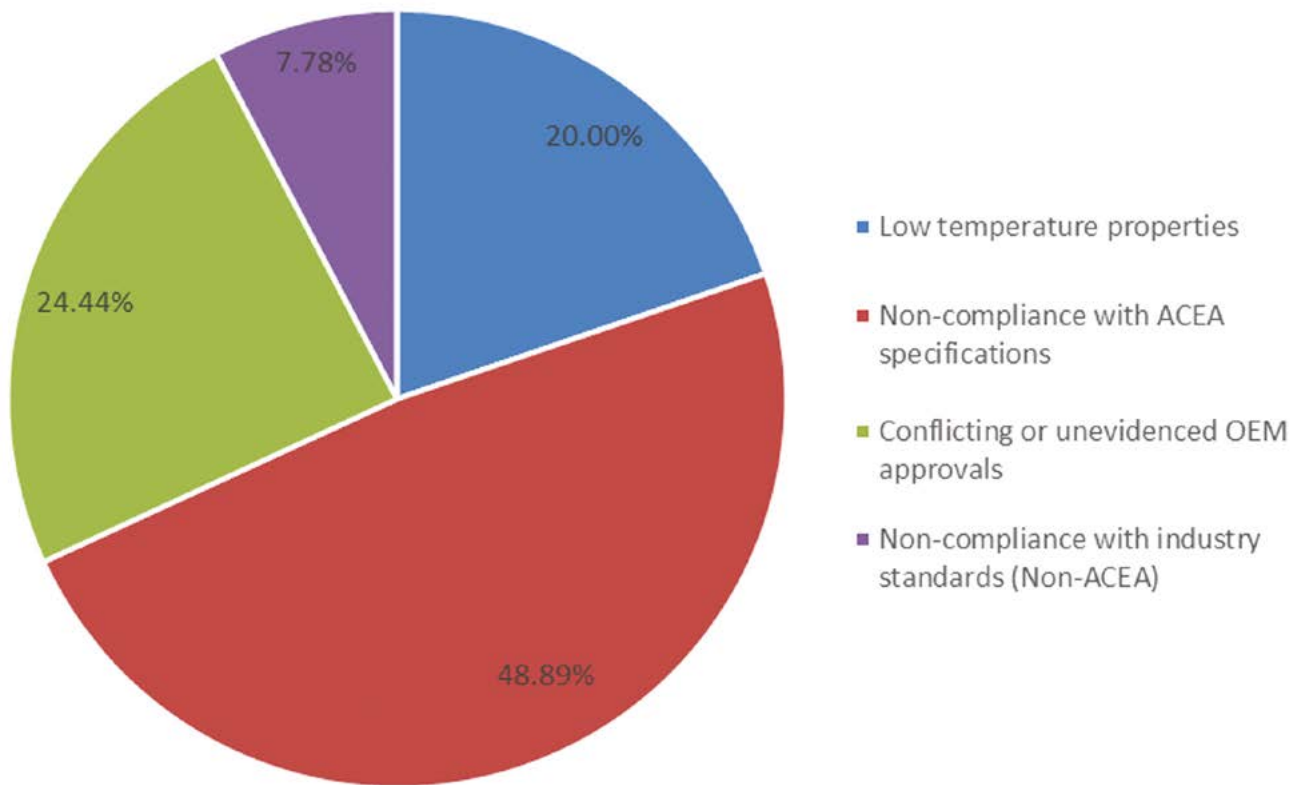


Figure 2: VLS case summary by complaint type 2013-2023

Whether it be compliance with the ACEA, the European Association of major motor manufacturers, European Engine Oil Sequences, or other market standards or conflicting or unevidenced OEM approvals, most cases involve marketing claims. It is vital that any end user can be confident that a product can deliver what it claims and is suitable for use in the given application. In several cases, VLS has investigated products which have been found to be claiming mutually exclusive claims due to the chemical properties required, such as ACEA A3/B4, and ACEA C3. In this example, claims are being made against High and Mid SAPS specifications (Sulphated Ash, Phosphorous and Sulphur), which is technically unfeasible. The 'A' and 'B' categories are designed for passenger car vehicles, typically without exhaust after-treatment devices, and the 'C' categories are for light duty vehicles with catalytic converters and diesel particulate filters. Using High SAPS engine oil in vehicles with exhaust after-treatment devices can interfere with their operation and inhibit their performance.

Equally, cases have investigated companies using the term 'manufacturer approved' for which no evidence could be found or making generalised claims for which no substantiation was provided.

Case example: VLS010168 – Automotive Transmission Oil

This product was claiming Mercedes-Benz approvals for which no reference could be found on the approved lubricants listing on the Mercedes-Benz website. The products included gearbox oils, automatic transmission fluids, power steering fluids and level control fluids.

VLS worked with the Lubricant Marketer, referred to as the Named Party, to revise the product claims from formal approvals to marketing claims 'according to the specifications of...' which were reflected in the products' labels, website descriptions and the Technical Data Sheets.

In 2019, VLS introduced its *Marketing Claims Guidance* to educate manufacturers and distributors about the types of claims that can be used and how they should be evidenced. In 2020, VLS took this one step further by entering into a *Primary Authority relationship* with Trading Standards. Primary Authority is a legal partnership with a local authority (known as the Primary Authority) that provides businesses with assured, consistent regulatory advice that makes it simpler and easier to comply with Trading Standards legislation. Since its formation, VLS continues to work very closely with Trading Standards as a statutory body to provide assured advice on lubricant marketing issues and the basis of claims in consumer law.

With space at motor factors, workshops and forecourts at a premium, the temptation is to create lubricant products which can claim to cover huge swathes of the car parc. However, any claims made by a lubricant product must be backed up by evidence to ensure that end users can make informed choices and be confident the oil they are buying is fit for purpose.

The number of cases received each year has varied quite significantly

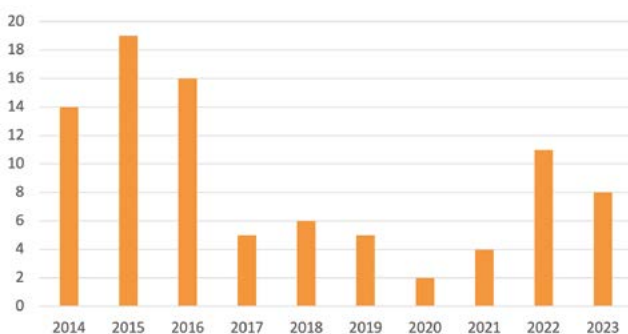


Figure 3: Number of cases received

The launch of VLS was met with an expected influx of cases due to pent-up demand. This kept the Technical Review Panel very busy for the first few years. Levels of education increased throughout the industry, and manufacturers and blenders were left with no doubt that their products would be policed if needed.

Covid had a clear impact on the number of cases received as the industry dealt with shutdowns and closures. Since 2013, VLS had been investigating complaints made on lubricant products it had

received. In 2022, VLS also began to proactively purchase independent product reports and investigate products that had been found to be non-compliant, leading to a rise in cases that year. The cases received to date in 2023 have already doubled the total for 2021.

The **longest case** ever to be investigated by VLS is case VLS010159. It was received in November 2020 and is still under consideration, having been referred to the UEIL Technical & Competition Committee.

The **shortest case** investigated to date by VLS is case VLS010116, a complaint regarding a Named Party's automotive engine oil brochures. The case was received on 12th February 2015 and resolved on 16th March 2015, within just a few weeks.

Five of the ninety cases investigated were found to have no case to answer, being either compliant from the start or could not be found available for sale in the UK market. This underlines the importance of the rigorous nature of the VLS process, allowing only genuine complaints to be investigated.

Of the ninety cases, twenty-five cases have involved VLS member products, underlining the importance of anonymity during the investigation process. In many cases, VLS members were grateful to VLS for highlighting internal process errors and giving companies the opportunity to take swift corrective action.

Cases have been received regarding products manufactured and distributed by companies across the lubricants industry, including Private Label brands, lubricant blenders and OEMs. VLS is focused on what is best for the consumer, regardless of who has produced the product, and every company involved in the industry can be subject to scrutiny.

Landmark case: VLS010167

One of the longest and most complex cases investigated by VLS, VLS010167 led to a change in the VLS process. The Technical Review Panel, a committee of independent experts drawn from across the lubricant supply chain providing technical advice and guidance to the VLS Supervisory Board of Directors, produced a set of advisories as part of a case investigation outside of the initial complaint.

The initial VLS process only allowed for investigations regarding the original complaint made. However, in this case, several other issues were uncovered during the investigation process. The Technical Review Panel felt it was part of their responsibility to highlight, not ignore, these other possible causes for complaint. In discussion with the Board, the VLS process was subsequently amended to allow for any other issues uncovered during an investigation to be highlighted to the Named Party as 'advisories', ensuring this vital information was not lost.

Key Milestones

2013: VLS formed to verify lubricant specifications and protect end users of the lubricants industry

2019: New Marketing Claims Guidance released in response to rise in cases

2020: Primary Relationship with Buckinghamshire and Surrey Trading Standards announced to supporting VLS in the escalation of cases as well as provide tailored advice and guidance for VLS and its' members

2021: Landmark case leads to change in VLS process to allow for advisories outside of an initial complaint

2022: VLS adopts proactive testing approach by purchasing independent research reports

3. Case Learnings

VLS's primary role is encouraging compliance and educating the end user. Case investigations have produced information valuable not just for individual parties being investigated but for the entire industry. When looking back over all the cases investigated over the past ten years, some of the key learnings have been:

1. Lubricant marketers must avoid making mutually exclusive performance claims or sweeping statements about which applications/vehicle marks lubricants are suitable for

Lubricant marketers remain legally responsible for the claims made on their products. Marketing claims must be correct to enable end users to make informed decisions on the correct lubricants for a vehicle and be confident that a lubricant is suitable for use in their vehicle or application. Greater technical awareness has been needed throughout the industry to ensure that marketers understand the claims they are making on particular products. It is the responsibility of the product marketer to ensure that they have sufficient data from a technically competent individual or organisation to justify any performance or application claims.

It is understandable that with margins under pressure, lubricant marketers are keen to service the maximum number of specifications with the minimum number of products. But they must be able to evidence their marketing claims so that technicians and end users can have confidence that the products they select really can deliver.

2. Lubricant marketers are responsible for updating all publicly facing materials, websites, print and labels

The information being given to end users at any point must be accurate and genuinely reflect the product currently being sold. Companies must also advise distributors and agents of any changes and stress the importance of them updating any

marketing materials and websites they have for the product so that information is consistent and correct.

3. Lubricant marketers must regularly audit product claims to ensure compliance

Marketers should not assume that because something was correct once, it is correct forever. Regular product testing and claim checking are vital to ensure continued compliance throughout a product's lifecycle.

4. Lubricant marketers should consider proactive quality assurance programmes to assess product performance to a given range of standards to support performance claims

Most marketers and manufacturers have quality control procedures in place, but not all are as rigorous as others. ISO standards, such as 9001 for a quality management system, are regularly used. Lubricant blenders will likely use quick physical Quality Control (QC) tests such as Low Shear Rate Kinematic Viscosity at 100°C (KV) and Low Temperature Cranking Viscosity (CCS) as elemental analyses to verify the correct additive treat rate. But they do not always invest in longer QC tests such as the Low Temperature Pumping Viscosity or MRV test. This involves the measurement of yield stress and low temperature viscosity aftercooling at controlled rates over a period exceeding 45 hours. Several VLS cases have been related to this test. If more comprehensive quality assurance programmes were in place in all manufacturers, these failures would likely have been picked up, appropriate action could have been taken, and the risk of potential damage to customers' vehicles would have been reduced.

5. Lubricant marketers claiming any ACEA performance standards must be signatories of the European Engine Lubricant Quality Management System (EELQMS) marketers Letter of Conformance

Any manufacturer claiming any ACEA standards must be a signatory, and this can be simply and easily checked by anyone via <https://www.sail-europe.eu/registrations/lubricant-marketers>.

6. Additive companies must provide appropriate support for current claims

Most lubricant manufacturers rely on Additive companies for their technical assistance in developing products to meet particular industry and OEM specifications. These Additives companies should be able to readily provide technical evidence such as candidate data packages or performance test data that detail results to given test standards and prove that the technology they are supplying can meet the specifications claimed. Evidence should be clearly documented and easily accessed by both the marketer and manufacturer.

Throughout these investigations, VLS procedures have proven to be robust. They have supported positive case outcomes, stimulating the required action to ensure products have been brought into compliance. The Primary Authority relationship with Buckinghamshire and Surrey Trading Standards entered into in 2020 has proved effective in concluding certain cases where escalation by exception has been required to prompt action.



4. Industry Impact

VLS has processed a significant quantity of cases over the past ten years. But has it had an impact?

VLS has played a vital role in providing clarity in an evolving industry

Over the past ten years, OEM and industry bodies have introduced many new specifications and sunset established ones.

Since 2013, four different ACEA engine oil sequences have been released for Passenger Car Motor Oil, or light duty, and Heavy Duty Motor Oil applications:

- ACEA 2010
- ACEA 2012
- ACEA 2016
- ACEA 2021/22

Each new set of ACEA engine oil sequences creates a significant workload for lubricant marketers and manufacturers to test existing products against the new market standards and/or develop new products to meet new categories. Upon the publication of a new set of ACEA engine oil sequences, lubricant marketers and manufacturers have a maximum two-year transition window to upgrade to the new sequence. New technical data sheets must be produced to reflect the new sequences. All this interpretation of new market standards leads to the likelihood of confusion, misuse of claims as well as inadequate removal of obsolete and misleading communications.

Vehicle manufacturers and lubricant organisations are committed to delivering improved performance, engine durability and reduced emissions. But this results in significant change. VLS has hosted events to help manufacturers and marketers understand the new sequences, as well as produced other materials to communicate the changes with the industry.

Low Speed Pre-Ignition

- Increasingly to improve fuel economy and reduce emissions passenger car manufacturers have introduced smaller but more powerful turbocharged direct injection petrol engines.
- These high-power density units deliver many benefits, but it has been found that under certain operating conditions, the phenomenon of Low-Speed Pre-Ignition (LSPI) can be observed.
- LSPI is premature combustion of fuel outside the engine cylinder head that can occur at low speeds and high loads and results in extremely high cylinder pressures.
- It can lead to an audible knocking noise which can develop further, causing engine hardware failure such as broken spark plugs or cracked pistons.
- Several factors have been demonstrated to impact LSPI, including engine design, fuel composition and lubricant formulation.
- It is for this reason that the latest industry sequences ACEA (C6 and A7/B7) and API SP, as well as some OEM specifications, include recently developed tests to monitor and prevent LSPI.

OEM changes have also had an impact

For example, some manufacturers have withdrawn support for different specifications being claimed on the same oil. New specifications have been introduced that are not backwards compatible to achieve greater fuel economy. Specifications can be updated with the same reference, meaning that they change over time.

Passenger Vehicle Example: VW Polo

A 2021 VW Polo 1.0 mpi requires an SAE 0W-20 engine oil complying with the latest VW 508.00 specification, part of which mandates very low high temperature, high shear properties (HTHS) to improve fuel efficiency. HTHS measures the viscosity or resistance to flow of an engine lubricant at elevated temperatures under constant shear.

This oil would be unsuitable for a 2017 VW Polo 1.0, which requires an SAE 5W-30 oil conforming to the older VW 504.00 specification, with higher and exclusively different HTHS properties.

Use of a VW 508.00 compliant engine oil in place of VW 504.00 would potentially result in accelerated wear of engine components. In contrast, a VW 504.00 compliant engine oil instead of VW 508.00 would affect emissions and fuel economy.

Commercial Vehicle Example: Volvo VDS-5

Volvo VDS-5 is a new heavy duty fuel-efficient diesel engine oil specification with an SAE viscosity of 5W-30. Designed for the latest 13L engines (Euro VI Step D), it is not backward compatible with previous Volvo Long Drain Specification fluids such as a Volvo VDS 4.5 SAE 10W-30 grade.

The lower viscosity can result in lower oil pressure, which could lead to multiple dashboard warning triggers. It is, however, expected to deliver over 0.5% fuel economy improvements versus 10W-30 oils.

VLS has worked hard to help manufacturers and marketers understand and adjust to these changes, including highlighting where claims can and cannot be made or removing retired or obsolete ACEA engine oil sequence claims that may be misleading end users and are no longer relevant.

It is interesting to note that following the formation of VLS ten years ago, additive companies have reported an increase in lubricant blenders requesting and verifying candidate data packs to ensure that the appropriate test data is available to support product performance claims.

"Infinem fully supports the efforts of VLS to improve the quality of lubricants in the UK market.

Challenges remain and we encourage oil marketers to ensure that their technology providers are fully compliant with industry codes of practice and can substantiate performance claims with engine test data."

Lubricant additive manufacturer, Infinem

5. Scope of VLS

In 2017, ATIEL, the Technical Association of the European Lubricants Industry, announced a new Compliance Policy to support lubricants marketers who were seeking to make valid performance claims based on the European Automobile Manufacturers' Association (ACEA) Oil Sequences.

In order to make the claims, lubricants manufacturers had to comply with the European Engine Lubricant Quality Management System (EELQMS) - an overall system which incorporated a range of standards, test methods, procedures, Codes of Practice and the ACEA Oil Sequences themselves.

ATIEL has been testing products for conformity since 2014, but testing was stepped up when the new policy was introduced in 2017

An independent company, Services to Associations and Industry in the Lubricants sector (SAIL) a subsidiary of ATIEL, was contracted to provide administrative, financial and management services in support of ATIEL's product compliance and Letter of Conformance activities, including carrying out continuous independent monitoring of engine lubricant quality to ensure compliance with sequences claimed.

Over the years, this programme has regularly found non-compliant products available on the global market. Most non-compliances were due to incompatible combined claims, such as products claiming ACEA A3/B4, C3. Other failures included chemical characteristics such as Total Base Number, Sulphated Ash, Phosphorous content, Noack volatility or evaporation, or viscometric characteristics such as high temperature high shear rate (HTHS) and low temperature pumping or cranking viscosities required for the ACEA sequences being claimed.

Their results have always come as no surprise and mirrored VLS's own findings

The benefit of the VLS programme is that its scope allows us to go further and delve deeper.

Whilst SAIL can only comment on ACEA engine oil sequences, VLS can investigate and offer guidance on OEM specifications as well as ACEA, API, and any other specifications and marketing claims made by lubricants marketers and manufacturers. VLS can also investigate other lubricant products, such as gear and transmission oils, hydraulic and other industrial lubricants. Our robust investigation process ensures that products are correctly marketed and really can deliver what they claim.



6. The Future of VLS Investigations

The lubricants industry has been through immense change over the past ten years as engine technology has evolved. To meet government requirements for reduced emissions and consumer needs for economy and performance, smaller engines are running at higher temperatures to maximise efficiency, power output and fuel economy. Longer oil drain intervals, taken together with smaller sumps and the need to minimise emissions, have created the need for less viscous, synthetic or semi-synthetic oils to provide the protection and performance required in these challenging conditions.

We expect to see this ultra-low viscosity trend continue, with engine oils such as SAE 0W-8 hitting the market

For the consumer, this could pose an issue. If you put a 0W-8 oil in an older vehicle which requires a 5W-40, the vehicle will be starved of the protective lubricant film it needs, leading to increase wear in the engine.

Over the past fifteen to twenty years, the contribution of engine oil has been increasingly recognised by OEMs. No longer just a consumable, the lubricant is viewed as an essential component in the same way as any other car part. The right lubricant properties can assist OEMs in delivering fuel economy and meeting emissions regulations whilst providing engine durability. This is only set to increase, leading to further complexity and a continued increase in different specifications for the manufacturer, marketer and end users to understand. VLS will continue to play a vital role in ensuring that all performance claims are correctly made and that products really can deliver on their promise.

Lubricants contribution to improving fuel economy

- The use of lower-viscosity engine oils can support efficiencies and improve fuel economy by reducing engine friction.
- For passenger cars, a change from a legacy SAE 15W-40 grade to SAE 0W-20 can yield up to 3-4% improvement in fuel economy under the New European Driving Cycle (NEDC) or the US Environmental Protection Agency (EPA) conditions. In some vehicles, using an SAE 0W-8 lubricant can bring an additional 2-3%.
- However, it is essential to check if the engine hardware can safely handle such low viscosities. The OEM's recommended SAE viscosity grade and performance specification should always be used.

The strive towards electrification has created a whole new market of Electric Vehicle (EV) fluids

"E-fluids must balance the need to maintain outstanding gear and bearing protection, cleanliness and performance while meeting new e-specific requirements."

Lubricant additive manufacturer, Infinuem

Electric and hybrid vehicles act in a very different manner from conventional petrol and diesel combustion engines.



Hybrid electric vehicles operate at lower temperatures with higher stress during stop/start and require additional lubricant additives to disperse increased sludge effectively. Battery electric vehicles reach very high temperatures, particularly during rapid charging. Specifically designed fluids must cater to the increase in oxidation and the need to dissipate the increase in generated heat around the power units. These coolants need the correct copper compatibility to avoid copper corrosion, used to conduct electricity, and must help avoid foaming produced by higher Revs per Minute (RPM) as air is taken into this high-stress environment.

Led by the major motor manufacturers, specifications are emerging for different EV applications, including transmission, thermal and corrosion management as well as material compatibility. But despite the impending restrictions on internal combustion engines, the sector is still very much in its infancy. Whilst many of these E-fluids are currently used in factory fill, some are already coming to the aftermarket as electric vehicles age and require maintenance.

As with any new, developing market, industry knowledge of these products is still scarce. Tests and specifications are under development by the OEMs and technology providers to regulate this emerging market and protect end users. At the time of writing there are no accepted market standards for EV fluids.

With end user knowledge still also developing, the need for accurate, useful data to inform product choices is more important than ever. VLS is watching the development of this area closely and will respond once specifications are in place and market standards are established, to raise awareness within the industry and ensure products meet the claims made.

Increasing use of biofuel could also impact lubricants

Whilst the UK moved to E10 petrol fairly recently, other countries are already using E15, a mixture of 15% renewable ethanol in a litre of fuel. The U.S. Environmental Protection Agency (EPA) legally approved E15 in 2011. E15 is fully approved for use in cars, SUVs, pickups, vans, or other light-duty vehicles that were manufactured after the year 2000, accounting for the majority of vehicles on US roads.

In Brazil, bio-fuel content is even higher, with the mandatory blend allowed to vary nationwide between 18% to 25% ethanol. Will the UK consider E15 if efforts to increase the use of electric vehicles are delayed by the lack of charging infrastructure?



In operation, renewable ethanol mix in fuel can decrease the oil viscosity, whereas the acid number could increase as renewable ethanol is more reactive compared to traditional petrol or diesel, which enhances oil degradation and oxidation.

Two key issues can result from the increased use of biofuels, the lubricant could thicken as a result of oxidation which could reduce flow around the engine leading to increased wear, which might shorten the engine's life. The use of biofuel could also increase the level of carbon deposits arising from oxidation in the piston ring grooves, which could restrict the movement of the rings and increase friction and wear in the cylinders. Or it could cause higher levels of abrasion on the parts the piston rings come in contact with, leading to higher rates of component wear.



You only need to look back at the UK introduction of bio-diesel content in the mid-2000s to see what damage it can do if not fully evaluated for compatibility. This overnight change to introduce up to 5% biodiesel was catastrophic for some older vehicles, leading to accumulation in the sump and vehicle recalls. Less engine oil had to be used in order to allow for the accumulation to stop the engine from simply cutting out.

Any further increase in the renewable or bio-ethanol content of petrol or diesel in the UK may have a significant impact on lubricants. VLS will work closely with producers and OEMs to understand what the impact may be and any specification changes that might be required.

7. Conclusion & Thanks

VLS is grateful to the members of the Technical Review Panel and their organisations for the support that they give. Our robust, anonymous process, managed by a team with the necessary expertise, is vital to the success of VLS. Lubricants are a highly complex area, and not many people have the skills required to adequately investigate products as well as work with Named Parties to assist them in taking the required action to bring products into compliance.

Members of the Technical Review Panel give their time freely and voluntarily for the benefit of the entire industry, to raise awareness and education throughout the sector and ensure that end users can have confidence that lubricant products really can deliver what they claim.

As our industry rises to the challenge of even greater change and complexity, their technical expertise will be even more valuable than ever to support lubricant blenders, manufacturers, and distributors and protect end users.

Appendix: VLS Specifications and Marketing Claims updated guidance

VLS recognises the right of lubricant blenders, manufacturers and marketers to make marketing claims in connection with the description of their products. However, the use of these claims within the industry is complex and there is little consistency in the use of the terms applied to marketing claims.

The aim of the guidance is to bring clarity in the use of marketing claims and promote consistency in their use, thereby supporting the end user to better understand these terms and how they are applied in connection with the description and specification of lubricant products.

Types of Marketing Claim

VLS considers that there are three types of generic marketing claims of which two are common.

1. Approved. This means that the product name has been registered with the approval authority and a reblend approval sought and obtained.
2. 'Recommended for use', 'Suitable for use' or 'Meets the requirements of', amongst other terms. These terms indicate that the marketer is making an informed, professional judgement based on supporting technical evidence as to the suitability of a given lubricant to a stated application. These terms can include the following cases:
 - an approval exists on the formulation being used but the marketer has decided not to pursue a formal reblend approval for his product name.
 - an approval is not technically possible e.g. claims which are self-certified and there is no body to grant approval (e.g. ACEA sequences).
 - the specification is technically obsolete or one or more tests are currently unavailable but, on the basis of a technical judgement e.g. similarity with previously tested materials, the product would fully meet all the requirements of the specification.

- the lubricant marketer or technology provider has sufficient robust and relevant supporting data for the recommended application. This should be on the basis of engine test data against the requirements of the OEM specifications and/or data from substantial field trials where appropriate.

3. Not suitable for use. In practice, this would normally be indicated simply by the omission to claim one of the above classifications for the product.

In all cases involving marketing claims, it is the responsibility of the product marketer to ensure that they have sufficient data from a technically competent individual or organisation to justify any such claims.

VLS Process in the event of a complaint relating to a Marketing Claim

If a complaint is received that relates to a quantifiable aspect of a marketing claim, then the Technical Review Panel (TRP) to the VLS will be asked to make an assessment.

If the product claims an approval, then this will be checked with reference to an approval authority, such as an OEM's website. If this is not possible, the product marketer (the Named Party) will be asked to provide documentary evidence that a valid and current approval exists.

If the product is 'Recommended for use', 'Suitable for use' or 'Meets the requirements of', the TRP will ask the Named Party (through the VLS Secretariat) to provide details of the technical assessment that underpins the marketing claims.

If the product makes any claims to current ACEA sequences or current API claims, then the Named Party would be asked to have their Technology Provider provide the Candidate Data Package underpinning these claims.

In the case of claims for suitability against OEM requirements, the Lubricant Marketer would be asked for a letter from their Technology Provider

indicating how they support the suitability of the actual formulation being blended by the Named Party against the OEM claim.

The TRP will also assess the overall coverage of the claims made to ensure that they are not mutually exclusive in terms, for example, of viscometrics or chemical composition. In the same way that the identity of both the Named Party and the lubricant are withheld from members of the TRP, the identity of the technology provider will also be withheld from the general membership of the TRP. The request for information from the Named Party will be managed through the VLS Secretariat, and the response received will be passed to a member of the TRP who has no affiliation with any single oil marketer, blender or technology provider.

If the Named Party can provide the correct information to show that either an approval has been granted or that their technology provider can robustly underwrite their claims this would be reported to the VLS Supervisory Board through the TRP who would conclude that the complaint is not justified.

If the Named Party cannot or does not provide such supporting information then this would be reported on the website and in Lube Magazine when the details of the complaint are made public. Additionally, in the case of ACEA claims the details would be passed onto ATIEL/SAIL as they would not be compliant with the requirements of EELQMS.

VLS Members



VLS Supporters





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