

## **Guidance Pertaining to Gear, Chain or Wire Lubricant Product Labeling** *For California's Regulation for Reducing Emissions from Consumer Products*

The purpose of this regulatory guidance document is to clarify the product labeling requirements for the exclusion from the definition of "Gear, Chain, or Wire Lubricant" products as defined in section 94508(a) of the California Air Resources Board (ARB/Board) Regulation for Reducing Emissions from Consumer Products (title 17, California Code of Regulations (CCR), sections 94507-94517) (Consumer Products Regulation). For reference, the Consumer Products Regulation is available here: [http://www.arb.ca.gov/consprod/regqs/2015/article\\_2\\_final\\_1-22-15.pdf](http://www.arb.ca.gov/consprod/regqs/2015/article_2_final_1-22-15.pdf)

### **Section 94508(a)**

As defined in section 94508(a)(82)(C)(5):

*"Gear, Chain, or Wire Lubricant" means any "Lubricant" designed or labeled exclusively for use on gears, chains, or wire ropes. "Gear, Chain, or Wire Lubricant" does not include lubricant products labeled solely for use on chains of chain-driven vehicles.*

### **Background**

On December 10, 2011, the Board adopted amendments to the Consumer Products Regulation that modified the Lubricant definition to include the subcategory of "Gear, Chain, or Wire Lubricant." Effective December 31, 2013, aerosol "Gear, Chain, or Wire Lubricant" products are subject to the 25 percent by weight VOC limit. The VOC limit for nonaerosol "Gear, Chain, or Wire Lubricant" is 3 percent by weight, effective December 31, 2013.

### **Frequently Asked Question**

What are the requirements for exclusion from the definition of "Gear, Chain, or Wire Lubricant?" The last sentence of the definition specifically states "...*does not include lubricant products that are labeled solely for use on chains of chain driven vehicles.*" Emphasis supplied.

The "Gear, Chain, or Wire Lubricant" definition only excludes lubricant products that are exclusively designed and labeled for use on the chains of chain driven vehicles in the "Gear, Chain, or Wire Lubricant" category. One example of a product that would satisfy the criterion for exclusion from the definition of "Gear, Chain, or Wire Lubricant" would be a product that is labeled with the statement "For Chain Driven Vehicles Only" and does not make any additional lubricant use claims. In this case, because the manufacturer has explicitly labeled the product as described in section 94508(a)(82)(C)(5), this example product is exempt from the "Gear, Chain, or Wire Lubricant" definition.

Another example of a product that would meet the criterion for exclusion from the definition would be a product labeled: “Bicycle Chain” lubricant – with no additional lubricant use claims, images, or suggestions.

Similarly, a product labeled: “Chain Lubricant” with an image of a motorcycle/ATV (with no additional lubricant use claims, images, or suggestions) would meet the criterion for exclusion from the definition.