



NLGI Food Machinery Lubricants Working Group
Tucson, Arizona, September 27, 2021

As Chair, Larry Ludwig of Schaeffer Oil kicked off the meeting with the antitrust statement. Tyler Housel (TH) of Zschimmer & Schwarz volunteered to take notes.

The planned election for vice-chair could not be held since there were no volunteers. Anyone interested in the vice-chair position should speak to Larry.

The meeting started with a discussion of the suggestion to rename the working group to remove the term "food grade". William Tuszynski-WT (Unami Group) is editing the next revision of the NLGI Grease Guide. The Guide has a chapter on H1 greases and consciously avoids the term "food grade" arguing that it is inaccurate and misleading. Most food processing lubricants fall into the H1 category which implies incidental food contact. In most industries, the term food grade is used for direct food contact products (plastic containers) or food additives (food grade glycerin).

Eric Willett-EW (Functional Products) said it would be helpful to change the name of the group as a first step to aligning the terminology in our industry to reflect our customer's understanding. But there is still a long way to go.

Eric Cline-EC (Hydrotex) wondered if the WG topics would include just H1 lubricants or would also discuss issues affecting 3H and H3 categories since 3H products can be eaten.

Wayne Mackwood-WM (LANXESS) said that food grade was probably a poor choice, but the WG name should still include the work "food".

John Sander-JS (Lubrication Engineers) agreed that leaving out the word "grade" was a good idea and suggested "food machinery lubricants" for the WG. This name was generally viewed as the best overall suggestion.

Constantin Madius-CM (Akzo) said it is unclear what steps are required to formally change the name of the WG since this is a joint WG with ELGI and cannot be changed unilaterally.

The next agenda item was an update from NSF presented by Orsi Deszi (OD).

OD said that the pandemic has caused several changes in the food industry. As restaurant meals declined there were more foods industrially processed and eaten at home. Many new products and companies have emerged and there is still a demand for in-person audits.

NSF has eliminated H1/H2 dual listings and created a different mark for use with H2 products to reduce confusion. H2 labels must say "NO FOOD CONTACT".

NSF is working on new category codes in the "U" category including U1 for surface lubricants used to manufacture utensils and U2 for Cutting Oils. I don't know if Bono has approved this.

Maybe the biggest issue is the ongoing regulations around lubricant ingredients and or possible contaminants such as TiO₂, BHA, BHT, Color dyes, PFAS etc. Someone also mentioned alkylated diphenylamines. It is not clear if these will regulate them away from being used in incidental contact lubricants. NSF continues to monitor the global regulatory situation and will inform the WG if changes will affect H1 or the other familiar categories.

NSF is also considering auditing against other claims such as vegan, gluten-free, and allergen-free.

JS said that NSF has an informal role as an arbiter of global regulatory standards and maybe it is time for NSF to provide their own qualification that incorporates H1, EFSA, and other global guidelines.

After the NSF presentation, the discussion continued around non-intentionally added substances such as MOSH, MOAH, PFAS, PFOA, TiO₂.

TH pointed out that this is a significant change in direction and much harder for the industry. With H1, we essentially have a list of substances that are allowed when formulating lubricants. But now we spend most of our effort proving what is not in the lubricant. Unfortunately, every time someone has concern about a chemical, it's added to the list.

Gareth Fish said this shift has created a nightmare scenario and used the example of MOSH and MOAH to show how much effort the lubricants industry has needed to prove something is not present.

EC said he spends an inordinate amount of time writing letters to satisfy customers and protect against liability. Others agreed.

WM also added that grease manufacturers cannot control the amount of lubricant that eventually gets into the food supply. The food manufacturer chooses the equipment and is responsible for maintenance. These are the most important factors that determine the safety of our products.