**Joint position paper on Lithium salts harmonized classification and labelling proposal – March 2022**

Following the proposal by ANSES (on behalf of the French MSCA) in June 2020 for harmonized classification (CLH) for reproductive toxicity category 1A – H360FD, for lithium carbonate, lithium chloride and lithium hydroxide, ATIEL, the Technical association of the European lubricants industry, together with the UEIL and the ELGI, is raising some concerns about the appropriateness of the proposed dossier.

The three associations are supporting the technical arguments that have been submitted during the consultation, notably by FUCHS the lead registrant of lithium 12-hydroxystearate and by Lithium REACH consortium. We indeed question the selection of the studies and the read-across performed. It must be noted that the uncertainty of the read across approach from lithium carbonate to lithium hydroxide was also highlighted by the Finnish competent authority expert in its written minority opinion. Also that due to lithium hydroxide's corrosive properties and thus implemented risk management measures, it is highly unlikely that lithium hydroxide can induce reproductive toxicity.

This classification would have a severe impact on the lithium-based greases which are of major importance in multiple industrial and professional applications in Europe, such as the operation of all wind turbines, ensuring the performance of most of the industrial machines that use electrical motors, aircraft lubrication (including landing gear), and numerous automotive parts such as wheel bearings, which are just a few applications that are key to society. Replacement of Li-based greases would result in performance loss, lower levels of machine availability, higher greenhouse gas emissions and a substantial volume increase of resource-demanding grease type products helping to meet the goals of the new green deal.

Lithium hydroxide is used as raw material, acting as a starting material together with a fatty acid to manufacture the thickener in the production of greases. The fatty acids used for the reaction are normally derived from natural sources with typical compositions but a certain range of variability from batch to batch. This may result in a slight excess of lithium hydroxide after the reaction in certain batches to meet the desired grease properties.

If the final concentration of Lithium Hydroxide exceeds the classification threshold for toxicity for reproduction Cat. 1A or 1B, the final grease will be classified accordingly. The application of the conservative calculation method (assuming presence of Lithium Hydroxide above 0.3% in general) would lead to an over-classification in most of the cases. The quantitative measure of free lithium hydroxide is not yet harmonized nor easy to define and will make enforcement extremely difficult.

Lithium based greases are the most widely used greases in Europe, at approximately 70 % of the grease used (2020 NLGI Annual production Survey). Lithium based greases are produced in multiple sites in Europe, today very strict risk management measures are already applied due to the corrosive properties of lithium hydroxide. Lithium based greases have been used safely over the last decades, and we question such a proposal that could be detrimental for investments in the sector.

We would appreciate a careful consideration of such a classification from the Commission considering the weaknesses of RAC information selection and weight of evidence assessment.