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*Ballot Item 1 - Modify API 1509 as follows: replace the existing Appendix C with the text shown below and add the bolded and underlined material shown on pages 8 and 9 to Section 1 – General, paragraphs 1.2.5 and 1.2.8.*

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**DEVELOPING NEW ENGINE OIL PERFORMANCE STANDARDS FOR THE API  
CERTIFICATION MARK**

**C.1 GENERAL**

One of the objectives of API's voluntary Engine Oil Licensing and Certification System (EOLCS) is to help consumers identify engine oils recommended by vehicle and engine manufacturers. To accomplish this objective, the International Lubricant Standardization and Approval Committee (ILSAC) and API created the API Certification Mark, "Starburst" for short, a Registered Mark that clearly identifies passenger car engine oils meeting the latest engine oil performance specification adopted by ILSAC and API. Vehicle and engine manufacturers, technical societies, trade associations, lubricant and additive marketers, independent testing laboratories, and consumers play essential roles in defining and developing new minimum performance specifications for engine oils.

This appendix outlines the primary process that ILSAC uses to set specifications for certain passenger car engine oils, and describes the procedures that API will use to determine whether these specifications become the criteria against which engine oil marketers are licensed to use the API Certification Mark.

**C.2 ILSAC/OIL COMMITTEE**

ILSAC specifications are developed through a committee known as the ILSAC/Oil Committee (~~henceforth referred to as the Committee~~), which is composed of representatives from ILSAC member companies and the API Lubricants Committee. The ILSAC/Oil Committee guides and facilitates the development and introduction of ILSAC performance specifications for passenger car engine oils. In addition to these members, liaison representatives from allied organizations— for example ASTM, ILMA, and the U.S. Army— may also be asked to participate.

**C.2.1 MEMBERSHIP**

Membership of the ILSAC/Oil Committee shall consist of 50% representation from ILSAC and 50% from API. ILSAC and the API Lubricants Committee will establish the number of representatives. ILSAC shall designate one of its members as the ILSAC/Oil Committee chair. ILSAC members and API will jointly fund the ILSAC/Oil Committee meeting expenses. API will provide administrative support such as meeting announcements, minutes, and mailings of meeting information.

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### **C.2.2 VOTING**

The ILSAC/Oil Committee shall attempt to reach consensus on issues related to needs and the issuance and finalization of a draft specification. Consensus is defined as approval by 2/3 of ILSAC representatives and 2/3 of the Oil representatives. If the ILSAC/Oil Committee **vote** cannot achieve consensus on the draft specification, then ILSAC may issue a draft for industry comment pursuant to section C.3.2.4. If the ILSAC/Oil Committee **vote** cannot achieve consensus on the final specification, then ILSAC may issue an ILSAC specification pursuant to section C.3.3.2.b. If the ILSAC/Oil Committee cannot achieve consensus on needs, the Administrative Guidance Panel will convene pursuant to section C.4.1.2.

A quorum of 2/3 of both industries is required for the ILSAC/Oil Committee to conduct official business.

### **C.2.3 PROCEDURES**

The ILSAC/Oil Committee shall provide an adequate level of due process by ensuring that:

- a. All meetings of the ILSAC/Oil Committee where the proposed standards are discussed, decisions made or votes taken are open to all interested parties.
- b. Interested parties are given a meaningful opportunity to comment on draft specifications. Comments received by the ILSAC/Oil Committee shall be reviewed and evaluated pursuant to the consensus criteria specified in C.2.2. The ILSAC/Oil Committee shall respond in writing to comments received on the draft specifications.
- c. Any party having a material interest in the process has the right to bring a timely appeal of an ILSAC/Oil Committee action or decision. Appeals must be submitted in writing to the Chair of the ILSAC/Oil Committee. If the objections cannot be resolved by the Chair, the appeal will be transmitted to an ILSAC appeals board for resolution.

### **C.3 ILSAC/OIL DEVELOPMENT PROCESS**

The ILSAC/Oil performance category development process is designed to accomplish the following:

- a. Validate the need for a new category.
- b. Achieve stakeholder consensus early in the process.
- c. Optimize the process for developing and approving new categories.

A new category is developed over several steps, some of which are conducted in parallel and provide input to subsequent steps, as summarized in Figure (FLOWCHART).

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### **C.3.1 DETERMINATION OF NEED**

#### **C.3.1.1 Request for a New Category**

Any individual, company or association may request a new definition of oil performance that may eventually result in a new category. To invoke the evaluation process, the new category request must be submitted to the Chair of the ILSAC/Oil Committee and to the Chair of the API Lubricants Committee.

The request for a new category must include adequate data and justification for the proposed category. The request must demonstrate a need for significant oil performance changes to meet requirements not met by existing categories. Justification should include, but is not limited to, one or more of the following:

- a. ~~Likely or impending~~ Impending government regulations.
- b. Consumer-driven needs.
- c. New hardware design or service requirements.
- d. Field problems encountered with current oils.

Following the receipt of the new category request, the Chairs will notify ILSAC and the API Lubricants Committee of the proposed category and request that the associations either confirm the existing ILSAC/Oil Committee representatives or designate new representatives to serve on the ILSAC/Oil Committee, as appropriate.

#### **C.3.1.2 Evaluation Criteria**

The ILSAC/Oil Committee will work to reach a consensus position on the need and timing for the new category by considering the following questions:

- a. What is the proposed change and why is it required?
- b. Does data presented support the request?
- c. When is it needed in the marketplace?
- d. What are the potential impacts on engines?
- e. What are the potential impacts on consumers?
- f. What are the potential impacts on the environment?
- g. How could the change affect existing API categories? Could an existing API category satisfy the need expressed?
- h. What performance and field tests are needed to properly evaluate the performance needs requested?
- i. Are the tests available now? If not, in what timeframe can the performance and field tests be developed?

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The ILSAC/Oil Committee may solicit additional industry input and data at any time to assist it in reaching a decision. Other industry groups [for example, SAE, API Detroit Advisory Panel (DAP), and EMA] may be asked to provide supplemental information.

**C.3.1.3 Decision on Need**

The ILSAC/Oil Committee shall evaluate the request pursuant to the consensus process outlined in C.2.2 and make one of the decisions below:

- a. Support the request for the new ILSAC category and proceed with development. This recommendation shall document the basis for determining that there is a need for the new category.
- b. Deny the request.
- c. Determine that it cannot reach consensus.

The sponsor has the option of resubmitting the request with additional information if the ILSAC/Oil Committee denies the request or is unable to reach consensus. If the ILSAC/Oil Committee cannot achieve consensus on needs after reviewing the additional information, the Administrative Guidance Panel will convene pursuant to section C.4.1.2.

**C.3.2 CATEGORY DEVELOPMENT**

When the ILSAC/Oil Committee approves the request for the development of a new category, the ILSAC/Oil Committee will proceed with development. Parties such as ACC, ASTM, SAE, ILMA, and independent test laboratories may be requested to provide assistance in the development process. Other national, regional or international bodies—for example, JASO and Conseil Européen de Coordination pour les Développements des Essais de Performance des Lubrifiants et des Combustibles pour Moteurs (Coordinating European Council) (CEC)—may also be asked for input during this process.

**C.3.2.1 Timing**

The ILSAC/Oil Committee will draft a timetable for the development of a new category to enable the issuance of the ILSAC specification and licensing of products with the API “Starburst” at the earliest practicable date. That timetable will indicate the dates at which specific development milestones should be reached and the date first allowable licensing of the Starburst should occur for the new category. This date of first licensing shall allow oil marketers a reasonable opportunity to perform the testing requirements.

**C.3.2.2 Identification of Test Development Needs and Alternatives**

If an appropriate test method is not available, a new test method must be developed. Test procedures may be developed or modified by ASTM, CEC, JASO, or other technical societies or trade associations, an OEM, or a third party contractor.

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The ILSAC/Oil Committee will monitor the category development process to ensure adherence to the approved timeline. The ILSAC/Oil Committee will also develop alternative methods of satisfying the category needs in the specified timeline, to ensure that unanticipated problems or situations will not have the potential to unduly delay category development. If a test or a performance measurement is not ready by the scheduled time, a replacement shall be developed or the requirements shall be dropped.

### **C.3.2.3 Development of ILSAC Draft**

#### C.3.2.3.1 Review of Proposed ILSAC Draft Specifications

After agreement has been reached on the need, tests and alternatives have been identified, and timing has been established, the ILSAC/Oil Committee is charged with developing a draft specification. Performance-based rather than composition-based standards should be used to the maximum extent feasible. The ILSAC/Oil Committee may consider proposed requirements submitted by any stakeholder in the engine oil category process (ILSAC, API, ACC, a company, an individual, or another association). After considering these inputs, the ILSAC/Oil Committee may send its proposed draft to the ASTM Passenger Car Engine Oil Classification Panel (ASTM PCEOCP) for review within a specified timeframe. If appropriate, the ILSAC/Oil Committee may also send the proposed draft to JASO and CEC.

As necessary, the ASTM PCEOCP, JASO and/or CEC will be asked to review the proposed draft, and within a specified time frame, prepare an informal report for the ILSAC/Oil Committee to consider as it develops a draft ILSAC specification for the new category. The following inputs will be requested from the ASTM PCEOCP, and if necessary JASO and CEC, during this review:

- a. The groups will evaluate the proposed draft specification and limits and provide comments on whether the proposed test methods will evaluate the needs defined by the ILSAC/Oil Committee.
- b. Each group will be requested to issue a report to the ILSAC/Oil Committee that contains a summary of comments and data received during the group's proceedings.

While the ILSAC/Oil Committee may seek input from the ASTM PCEOCP, JASO, and CEC, the ILSAC/Oil Committee may proceed with the category development if the results of these reviews are not delivered within a specified timeframe. Pursuant to the consensus process specified in C.2.2, the ILSAC/Oil Committee will issue a draft ILSAC specification for review and comment by all interested parties (see C.3.2.4).

#### C.3.2.3.2 Formalization of Tests

In parallel with C.3.2.3.1, the Administrative Guidance Panel is responsible for forming a group to develop the funding basis for conducting industry precision matrix testing, if necessary. This group should include representatives from the principal stakeholders in the process: ILSAC, API, ACC, independent test laboratories, and other parties deemed appropriate.

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Once a new test becomes available (e.g., shows satisfactory discrimination of oil performance) pursuant to C.3.2.2, the appropriate industry group (ASTM, CEC, JASO) will determine test precision.

For example, if an engine test is being developed by ASTM, the ILSAC/Oil Committee will provide a specified timeframe to ASTM. It is ASTM's responsibility to have a functioning task force or surveillance panel in place to coordinate activities and analyze test data including determining when a test is ready for matrix testing. For bench tests, ASTM must provide a method for referencing and/or calibrating each bench test that does not have an assigned surveillance panel. Based on the ILSAC/Oil Committee's agreed upon timeline, ASTM will also develop a timetable that contains, among other things, planned dates for reference oil selection, bench and engine test selection, and test method completion. The objective is to formalize the tests and establish criteria to demonstrate that the tests are precise, are reproducible, and have the ability to discriminate. All applicable engine and bench tests shall be monitored by the TMC (or equivalent) prior to incorporation into the final specification (see paragraph C.3.3).

If ASTM fails to discharge these responsibilities in a timely manner, the ILSAC/Oil Committee shall take appropriate actions to ensure that the timing identified in C.3.2.1 for implementing the specification will be met. This may include developing an ILSAC specification containing alternative test methods.

#### **C.3.2.4 Industry Review of ILSAC Draft Specification**

The draft ILSAC specification developed in C.3.2.3 will be circulated to all interested parties for comment. The ILSAC/Oil Committee will solicit comments in writing and will hold public forums as deemed appropriate. The ILSAC/Oil Committee will review the comments and data from the industry received in C.3.2.3 before determining the requirements and limits for the final specification. If there are significant changes in the requirements between the draft and the final specification, the ILSAC/Oil Committee will conduct another comment period on the revised specification. All comment periods will be for a period of at least 30 days. A longer review period may be allowed for comments on an initial draft.

In parallel with industry review of the draft ILSAC specification, API will solicit data on category demonstration oils (see C.3.3.1.b) in such a manner as to maintain confidentiality of individual company data.

### **C.3.3 CATEGORY FINALIZATION**

#### **C.3.3.1 Review of Development Process**

At or near the end of the development of the new category (e.g., prior to C.3.3.2), the ILSAC/Oil Committee shall confirm that the following items have been addressed:

- a. (1) The tests developed satisfy the needs agreed to by the ILSAC/Oil Committee, (2) the performance targets contained in the proposed consumer language are met by the tests proposed

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for the category, (3) the timetable is acceptable, (4) and the test methods chosen to define the new standard represent the best means of establishing the new performance level.

b. Review of available data on demonstration oils. A demonstration oil shows the technical and commercial viability of the proposed new engine oil category. This is an oil formulated with base stock and additive components expected to be commercially available when licensing of the new category begins. The oil shall have been tested in and passed, at the proposed limits, all engine, chemical, physical and bench tests required in the draft specification, according to the ACC Code of Practice<sup>1</sup> in effect at the time the tests are run (for engine tests). Registration is not needed, but stand calibration is required.

c. If sufficient information on a demonstration oil is not available, ILSAC/Oil will re-evaluate the draft specification for technical and commercial viability. While information on a demonstration oil is useful as input to the limit-setting process, and may help achieve consensus, the demonstration oil is not required prior to achieving the ILSAC/Oil Committee consensus pursuant to C.3.3.2.a.

d. Review of all industry comments on the proposed specification to ensure that they have been reviewed and addressed by the ILSAC/Oil Committee in sufficient detail.

**C.3.3.2 Approval of the Final ILSAC Specification**

When the ILSAC/Oil Committee agrees that its original goals and objectives appear to have been met, the ILSAC/Oil Committee will promptly convene to vote on acceptance of the final ILSAC specification. The specification may be issued by ILSAC under the following conditions:

a. 2/3 of the ILSAC representatives and 2/3 of the Oil representatives vote in favor of the specification.

b. If the ILSAC/Oil Committee is unable to reach a consensus position on the final specification, then ILSAC may, after providing notice to all interested parties, unilaterally issue the specification. ILSAC shall document rationale for unilaterally issuing the specification.

When the specification has been approved pursuant to paragraph a. or b., ILSAC shall publish the final specification and send copies to all interested parties. A copy of the final specification shall be transmitted by the Chair of the ILSAC/Oil Committee to the Chair of the API Lubricants Committee for further action pursuant to C.4.

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<sup>1</sup> Provided the ILSAC/Oil Committee has accepted the Code of Practice as a basis for engine testing.

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**C.4 API LUBRICANTS COMMITTEE APPROVAL OF LICENSING AND CRITERIA**

**C.4.1 ILSAC SPECIFICATION**

A meeting of the API Lubricants Committee will be scheduled as soon as possible after API has received the final ILSAC specification. The Lubricants Committee will vote whether to accept the ILSAC specification as the basis for licensing of the API Starburst via letter ballot pursuant to API standardization policies.

In resolving negative ballots, the Chair of the Lubricants Committee will consider whether the issue that was raised in the negative ballot was (1) adequately addressed in the ILSAC/Oil process, and (2) raised in a timely manner.

**C.4.1.1** When submitting an ILSAC specification that has been approved pursuant to Section C.3.3.2.b., ILSAC must provide documentation that the following criteria has been satisfied:

- a. Complied with due process requirements.
- b. Provided justification for overriding any technical objections raised during the ILSAC/Oil process.
- c. Provided data on at least one demonstration oil meeting all of the requirements defined in C.3.3.1.b at the time the specification is delivered.
- d. Showed that the ILSAC specification oil will be reasonably achievable and will likely be widely available to consumers within the specified timeframe (e.g., recommended additional time for compliance).
- e. Based on data from c. and d. above, showed that the ILSAC specification provides significantly more needed benefits to consumers (as identified in C.3.1) than any other specification proposal the ILSAC/Oil Committee considered.

**C.4.1.2** If the API Lubricants Committee does not adopt the ILSAC specification, or if the ILSAC/Oil Committee cannot achieve consensus on needs, the Administrative Guidance Panel will convene to consider dissolution of the “Starburst” system.

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***Add the following to API 1509, Section 1 – General, paragraphs 1.2.5 and 1.2.8 (additions shown in bold and underlined font):***  
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**1.2.5** API uses an alphanumeric system known collectively as API Service Categories to define specific engine oil performance levels. These categories are commonly used by vehicle and equipment manufacturers to identify the engine oil performance levels required by gasoline and diesel engines. The API Service Symbol displays current API Service Categories. **The process for developing API C Categories is explained in Appendix D.**

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The API Certification Mark does not change. Annual licenses for the API Certification Mark are issued only for engine oils that meet the current ILSAC performance requirements specified in Appendix Q. The process for developing new engine oil performance standards for the API Certification Mark is explained in Appendix C. At any time during this process, API's Lubricants Committee may ask ASTM or other bodies to recommend specifications for passenger car engine oils not addressed by the ILSAC minimum performance specification. This may include API Lubricants Committee itself formulating specifications for a separate engine oil quality category that will be described under the API S performance category based on deviations/exceptions from the specifications being considered during the Appendix C process.

**1.2.8** The test data that support product claims are the responsibility of the individual marketer. The API Lubricants Committee through its Base Oil Interchange/Viscosity Grade Read Across Task Force develops base oil interchange (BOI) and viscosity-grade read-across (VGRA) guidelines. The API Lubricants Committee and task force will determine if the matrix testing described in Appendix C is to be conducted for the new engine tests so that sufficient data is available to allow the establishment of appropriate BOI and VGRA Guidelines simultaneous with the establishment of the category performance criteria.

Marketers may choose to use the API Base Oil Interchangeability Guidelines, the API Guidelines for SAE Viscosity-Grade Engine Testing, or both in lieu of specified engine testing. However, the decision to use such guidelines does not absolve the marketer of the responsibility to ensure that each licensed engine oil satisfies all engine and bench testing performance requirements.