

ADDITIVE PACKAGES

ANP RESOLUTION No. 804, OF DECEMBER 20, 2019 - DOU DECEMBER 23, 2019

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ANP Resolution (RANP) No. 804/2019 defines the criteria for obtaining registrations for greases and lubricating oils to be marketed within the national territory, the responsibilities and obligations of registration holders, producers, and importers of lubricants, as well as the prohibitions applicable to these agents, distributors, and retailers.

One of the primary requirements for the registration of automotive lubricating oils is the performance certificate declared for the **additive package** used, which must be issued by the package manufacturer. Until the year 2021, the supply of these products was carried out by FOUR companies developing performance additives (AFTON, INFINEUM, LUBRIZOL, and CHEVRON-ORONITE), which comprise ABRAFA (BRAZILIAN ASSOCIATION OF ADDITIVE MANUFACTURERS).

The growth of the Brazilian lubricant market, as well as the decrease in non-compliance rates in recent years, sparked the interest of new automotive performance additive supply companies, which, from 2021 onwards, approached the ANP with the intent of marketing these additives.

Following meetings with these companies and verification of their productive and technological capacities—based on Paragraph 2 of Article 7 of RANP 804/2019, which states that at the ANP's discretion, other tests and documents proving benefits, characteristics, and performance declared on the label or other submitted documents may be requested—the ANP adopted the practice of evaluating engine test reports that prove the performance of the packages to be marketed. However, the significant increase in these new market entrants prompted the ANP to better understand the development, testing, and industrial-scale production processes of these products.

It should be highlighted that the performance classifications established by the **API** and **ACEA** are used worldwide and are directly related to the development of the automotive industry, with alignment between these institutions and various automakers. Therefore,

stating that an additive package meets API, ACEA, or SAE performance levels directly implies compliance with the methodology adopted by these institutions.

The API recognizes that an additive package was developed and remains produced according to its criteria when both the developer and the laboratories where the tests were conducted are certified by the **ACC (American Chemistry Council)**. This institution not only certifies companies and laboratories but also periodically audits and monitors the processes involved in the production and quality control of additive packages, ensuring that the marketed product is the same as the one whose performance was proven in engine tests.

On the website <https://acc-ma.org/>, under “ACC Sponsor IDs,” it is possible to verify the list of accredited companies and laboratories.

Similarly, ACEA recognizes developers and laboratories accredited by the **European Registration Centre (ATC-ERC)**. Further information can be found at <https://atc-erc.org/> under the “Compliance List.”

In an analogous manner, SAE recognizes additive developers for the **SAE J2360** specification through the **Performance Review Institute (PRI)**, a non-profit organization affiliated with SAE International. The PRI was created by SAE International to provide shared conformity assessment services, primarily for the mobility sector. The LRI QPL list, which details developers and their respective products approved for SAE J2360 performance, can be found at <https://www.p-r-i.org/qpl/lubricant-review-institute>. Only the additives listed there will be accepted for registrations claiming SAE J2360 performance.

The companies associated with ABRAFA that have operated in the national market for decades are accredited by both the ACC and ATC; the same applies to **Xinxiang Richful Lube Additive Co., Ltd**, which recently obtained accreditation.

It should be noted that additive packages are not products subject to direct ANP regulation; therefore, it is not within this Agency's purview to provide direct evaluation or approval. However, considering that such additive packages are used as raw materials in the formulation of lubricating oils produced in national territory, and frequently aim to meet performance levels established by international entities such as API and ACEA, it is necessary that they fully observe the technical criteria defined by these institutions.

Additionally, given that the ANP holds the legal competence to ensure the quality of lubricating oils marketed in Brazil, it is the prerogative of this Agency to require that the raw materials used in their manufacture comply with internationally recognized standards, thus ensuring the reliability and safety of the products made available to the national market.

Consequently, **only additive packages developed and duly approved by companies accredited by the following entities will be admitted as raw materials for the formulation of automotive engine lubricants:**

- **ACC**, regarding performance levels established by the **API**;
- **ATC**, regarding performance levels defined by the **ACEA**;
- **PRI**, regarding performance specified in the **SAE J2360** standard.

It should be emphasized that packages previously approved by this Agency prior to this guidance were considered valid until **December 31, 2025**. Therefore, product registrations for automotive engines using such packages must immediately update their formulations in strict compliance with the guidelines established herein, under penalty of non-compliance with applicable regulations and consequent cancellation of registrations.

Packages approved by this Agency prior to this understanding were accepted until December 31, 2025. Thus, registrations of automotive engine products using these packages must update their formulations immediately.

For **transmission additives**, the API does not require specific certification of developing companies or testing laboratories to certify lubricants or additives against API GL-4 and API GL-5 specifications. Therefore, the certification procedure previously adopted by the ANP will remain; that is, performance, bench, and elastomer test reports conducted by internationally recognized laboratories, with traceability and approval reports, will be evaluated. The same procedure will be adopted for transmission additive packages for other performance levels.

IT IS IMPORTANT TO HIGHLIGHT THAT ADDITIZATION BY INDIVIDUAL COMPONENTS IS PROHIBITED!

The list of packages from new suppliers not accredited by the ACC or ATC that were evaluated and accepted by the ANP in the period prior to 2025 can be verified below. Products from **Xinxiang Richful Lube Additive Co., Ltd** were removed from the table because, as the company has obtained ACC and ATC accreditation, individual evaluation of its packages is no longer necessary

COMPANY	ADDITIVE PACKAGES	PERFORMANCE LEVEL
TURMAK TURLOCK TEC	TURMAK 621G	API GL-5/GL-4
TURMAK TURLOCK TEC	TURMAK 632G	API GL-5/GL-4

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