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The lubricant industry is confronted with the demands of sensitive applications in the food, feed and pharmaceutical industry. These industries must meet the expectations of their customers and meet the demands put on their products by the local and European legislations. Consumer organisations add an additional dimension to this by alerting the public for perceived concerns around ingredients that are covered under current legislation or even exist in nature itself. Food is emotion.

The main area where we must educate is around what products we actually refer to. Lubricants is a very generic term and here we can mean lubricant base oils as well as blended formulated products containing multiple additives and a mix of base oils designed to lubricate equipment.

- The mineral white oils (highly refined base oils), when used as a food additive or component in the food are referred to as category 3H by the original USDS nomenclature. These white oils in general, are intended to come into contact with food. White oils can also serve as an ingredient of a machine lubricant.

- Lubricants are blended products made of a wide selection of allowed oils (f.e. Mineral oil, poly alpha olefin, alkylnaphthalene, polyol ester, polyalkyl glycol etc.) where a

number of selected additives are blended to make the final product for the lubrication of equipment. These components meet the FDA requirements and are considered safe when an incident might happen that was unforeseen and undetected for a short period. These lubricants carry the USDS nomenclature of H1 and are "incidental food contact". These lubricants are not supposed to be in the final food!

When food is analysed to contain MOSH and MOAH it will be important to establish where this is coming from and what type of MOSH and MOAH are involved. If a mineral oil was added to the food for the processing, then MOSH and MOAH will be found in the food, but since that mineral oil component was intended to be there it will be of the allowed type. It can well be that other MOSH and MOAH is found coming from unknown sources like environmental exposure or that it was a product from natural sources.

As lubricant industry, we must be clear and consistent with our message and avoid marketing claims that confuse (e.g. MOSH and MOAH free), cannot be sustained or are misleading. There are still categories in use like H2 that originate 50 years ago from an era where different technology was available. These categories are obsolete and add to the confusion and should be discontinued.

Current case studies MOSH & MOAH paradigm in “food contact” lubrication

Registration and certification:

There are currently two companies doing product registration for H1 (lubricant) and 3H (food additives), NSF and INS. There is an ISO standard for lubricant blending facilities ISO21469 that adds the needed verification by certifying not only the components in use but also blending, traceability and documentation of the lubricants produced.

An alignment of the interpretations between the USA and EU and within the EU national legislation regarding mineral oil will help global producers of foodstuffs assess the quality of globally sourced components sold in global markets