To: API Lubricants Group  
Cc: Lubricants Group Mailing List  
API  

**Base Stock Manufacturer (Definition) Ballot Proposal**

On March 4, 2020 the Lubricants Standards Group (LSG) reviewed the Base Stock Manufacturer (Definition) Ballot Proposal. The Base Stock Manufacturer Interest Group (BSMIG) proposed changes to E.1.2 DEFINITIONS, Annex I, Annex O, Q.1.3.3, R.1.2.5, E.1.1.1, F.2.2, F.4.3, F.4.5 and F.5.2. The “Base Stock Manufacturer (Definition) Ballot Proposal” is given below and in Attachment 1, pps6-11.

### Base Stock Manufacturer Ballot Proposal

#### E.1.2 DEFINITIONS

The definitions in E.1.2.1 through E.1.2.34 apply to these Guidelines.

**E.1.2.1** A *base stock* is a lubricant component that is produced by a single *base stock manufacturer* to the same specifications (independent of feed source or manufacturer’s location); that meets the same *base stock* manufacturer specification; and that is identified by a unique formula, product identification number, or both. *Base stocks* may be manufactured using a variety of different processes including but not limited to distillation, solvent refining, hydrogen processing, oligomerization, esterification, and rerefining. Blending alone or the rebranding of *base stocks* from another manufacturer does not constitute manufacturing. Rerefined stock shall be substantially free from materials introduced through manufacturing, contamination, or previous use.

**E.1.2.2** A *base stock slate* is a product line of *base stocks* that have different viscosities but are in the same *base stock* grouping and from the same *base stock* manufacturer.

**E.1.2.3** A *base oil* is the *base stock* or blend of *base stocks* used in an API-licensed oil a finished lubricant.

**E.1.2.4** A *base stock manufacturer* is the organization that defines the product identifier, specifications and its quality management system of *base stock(s)* that are produced at one or more manufacturing locations, and which are used in a finished lubricant. *Base stocks* may be manufactured using a variety of different processes including but not limited to distillation, solvent refining, hydrogen processing, oligomerization, esterification, and rerefining. Blending alone or the rebranding of *base stocks* from another manufacturer does not constitute manufacturing.

#### Annex I

**Base oil:** A *base stock* or blend of *base stocks* used in an API-licensed oil a finished lubricant.  
**Base Oil Interchangeability Guidelines:** See API Base Oil Interchangeability Guidelines above.  
**base stock:** A lubricant component that is produced by a single manufacturer (independent of crude source or manufacturing location), that meets the same manufacturer’s specification, and that is identified by a unique formula, product identification number, or both.  
**Base Stock:** A lubricant component that is produced by a single *base stock manufacturer* to the same specifications (independent of feed source or manufacturer’s location); that meets the same *base stock* manufacturer specification; and that is identified by a unique formula, product identification number, or both. *Base stocks* may be manufactured using a variety of different processes including but not limited to distillation, solvent refining, hydrogen processing, oligomerization, esterification, and rerefining. Blending alone or the rebranding of *base stocks* from another manufacturer does not constitute manufacturing. Rerefined stock shall be substantially free from materials introduced through manufacturing, contamination, or previous use.  
**Base Stock Slate:** A product line of *base stocks* that have different viscosities but are in the same *base stock* grouping and from the same *base stock* manufacturer.  
**Base Stock Manufacturer:** The organization that defines the product identifier, specifications and quality management system of *base stock(s)* which are produced at one or more manufacturing locations, and which are used in a finished lubricant.
Annex O
No. 22
Question: Does the blending of base stocks alone constitute manufacturing?
Answer: Base stock blending may be part of the manufacturing process but does not alone constitute manufacturing of a base stock. All base stock components used to blend a base stock must be produced by a single base stock manufacturer; blended to meet the same manufacturer’s specification for that base stock; and identified by a unique formula, product identification number, or both.

No. 23
Question: Are there any geographical restrictions on the manufacturer?
Answer: The base stock definition in API 1509, Annex E.1.2.1, states that a base stock is independent of manufacturing location as long as the base stock is produced by a single base stock manufacturer to the same specification, the base stock meets the manufacturer’s specification, and the base stock is identified by a unique formula.

E.1.1 INTRODUCTION
Not all base oils have similar physical or chemical properties or provide equivalent engine oil performance in engine testing. During engine oil manufacture, marketers and blenders have legitimate needs for flexibility in base oil stock usage. The API Base Oil Interchangeability Guidelines (BOI) were developed to ensure that the performance of engine oil products is not adversely affected when different base oil stocks are used interchangeably by engine oil blenders.

The API Base Oil Interchangeability Guidelines define the minimum prudent physical and engine testing necessary to ensure that engine oil performance is not adversely affected by substitution of one base oil stock for another. The Guidelines are based on actual engine test data, using different base oils, for both gasoline and diesel engine oil performance. The Passenger Car Motor Oil (PCMO) Guidelines were based on the use of API Service Category SG performance level additive technology and updated for SJ, SL, SM, and SN quality levels. The Diesel Engine Oil Guidelines were based on the use of API Service Categories CD and CD-II performance level additive technologies and updated for CE, CF, CF-2, CF-4, CG-4, CH-4, CI-4, CJ-4, CK-4, and FA-4 quality levels. At these relatively high levels of additive formulation, many of the base oil differences are “overwhelmed” by the additive performance package. For this reason, these guidelines should not be used to predict equivalent interchange at additive performance levels lower than API Service Categories SH and CD. These Guidelines define the minimum acceptable level of testing for interchanging a base oil that every marketer must perform as a condition for obtaining a license.

These Guidelines define the minimum acceptable level of testing for interchanging a base oil stock that every marketer must perform as a condition for obtaining a license.
After review and discussion, the LSG agreed by voice vote to ballot *Base Stock Manufacturer (Definition) Ballot Proposal (below and Attachment 1)*.

The Motion to Ballot *Base Stock Manufacturer (Definition) Ballot Proposal* is given below and included in Attachment 1.

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**Motion:** Request that the Lubricants Standards Group ballot the proposed changes to API 1509 as described in Slides 6 through 11.

- **Motion by:** Rick Dougherty
- **Second by:** Chris Castanien

**Approve:** 15  
**Negative:** 1  
**Abstain:** 0

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Lubricants Group Members should use the API Ballot System to cast their vote and make comments. The Ballot Link is: [http://Ballots.api.org](http://Ballots.api.org). The Lubricants Group Member votes will be counted, and all received comments reviewed and considered before the ballot results are final.

Non-Lubricants Group Members should comment on the Ballot Motion using the Ballot system. The Ballot Link is: [http://Ballots.api.org](http://Ballots.api.org). All comments on the Ballot Motion will be reviewed before the ballot results are final.

This Ballot will close on April 27, 2020. All Votes and/or Comments must be received by that date. If approved the balloted change will be included in the next revision of API 1509.
Attachment 1
Base Stock Manufacturer Ballot Proposal
BSMIG
Base Stock Manufacturer Ballot Proposal
BSMIG

MARCH 4, 2020
• Ballot negatives indicating a preference for defining a base stock “manufacturer”

• OEM desire to define a base stock “manufacturer”

• Request to change “entity” to “organization” consistent with the API definition of an oil marketer

• Concern regarding limiting definitions to API-licensed lubricants

• Examples desirable

• API legal review
BSMIG Ballot Proposal to Lubricants Group

Motion: Request that the Lubricants Standards Group ballot the proposed changes to API 1509 as described in Slides 5 through 11.

Motion by: Rick Dougherty

Second by: Chris Castanien

For: 15

Against: 1

Abstain: 0
Motion: Request that the Lubricants Standards Group ballot the proposed examples for inclusion in API 1509 as described in Slides 12 through 13.

Motion by: Rick Dougherty

Second by: Chris Castanien

For: 15

Against: 1

Abstain: 0
E.1.2 DEFINITIONS

The definitions in E.1.2.1 through E.1.2.3 apply to these Guidelines.

E.1.2.1 A base stock is a lubricant component that is produced by a single base stock manufacturer to the same specifications (independent of feed source or manufacturer’s location); that meets the same base stock manufacturer specification; and that is identified by a unique formula, product identification number, or both. Base stocks may be manufactured using a variety of different processes including but not limited to distillation, solvent refining, hydrogen processing, oligomerization, esterification, and rerefining. Blending alone or the rebranding of base stocks from another manufacturer does not constitute manufacturing. Rerefined stock shall be substantially free from materials introduced through manufacturing, contamination, or previous use.

E.1.2.2 A base stock slate is a product line of base stocks that have different viscosities but are in the same base stock grouping and from the same base stock manufacturer.

E.1.2.3 A base oil is the base stock or blend of base stocks used in an API-licensed oil—a finished lubricant.

E.1.2.4 A base stock manufacturer is the organization that defines the product identifier, specifications and its quality management system of base stock(s) that are produced at one or more manufacturing locations, and which are used in a finished lubricant.
E.1.2 DEFINITIONS

The definitions in E.1.2.1 through E.1.2.3 apply to these Guidelines.

E.1.2.1 A base stock is a lubricant component that is produced by a single base stock manufacturer to the same specifications (independent of feed source or manufacturer’s location); that meets the same base stock manufacturer specification; and that is identified by a unique formula, product identification number, or both. Base stocks may be manufactured using a variety of different processes including but not limited to distillation, solvent refining, hydrogen processing, oligomerization, esterification, and rerefining. Blending alone or the rebranding of base stocks from another manufacturer does not constitute manufacturing. Rerefined stock shall be substantially free from materials introduced through manufacturing, contamination, or previous use.

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E.1.2.3 A base oil is the base stock or blend of base stocks used in an API-licensed oil a finished lubricant.

E.1.2.4 A base stock manufacturer is the organization that defines the product identifier, specifications and its quality management system of base stock(s) that are produced at one or more manufacturing locations, and which are used in a finished lubricant. Base stocks may be manufactured using a variety of different processes including but not limited to distillation, solvent refining, hydrogen processing, oligomerization, esterification, and rerefining. Blending alone or the rebranding of base stocks from another manufacturer does not constitute manufacturing.
Annex I

**Base oil:** A base stock or blend of base stocks used in an API-licensed oil-a finished lubricant.

**Base Oil Interchangeability Guidelines:** See API Base Oil Interchangeability Guidelines above. Base stock: A lubricant component that is produced by a single manufacturer (independent of crude source or manufacturing location), that meets the same manufacturer’s specification, and that is identified by a unique formula, product identification number, or both.

**Base Stock:** A lubricant component that is produced by a single base stock manufacturer to the same specifications (independent of feed source or manufacturer’s location); that meets the same base stock manufacturer specification; and that is identified by a unique formula, product identification number, or both. Base stocks may be manufactured using a variety of different processes including but not limited to distillation, solvent refining, hydrogen processing, oligomerization, esterification, and re-refining. Blending alone or the rebranding of base stocks from another manufacturer does not constitute manufacturing. Rerefined stock shall be substantially free from materials introduced through manufacturing, contamination, or previous use.

**Base Stock Slate:** A product line of base stocks that have different viscosities but are in the same base stock grouping and from the same base stock manufacturer.

**Base Stock Manufacturer:** The organization that defines the product identifier, specifications and quality management system of base stock(s) which are produced at one or more manufacturing locations, and which are used in a finished lubricant.
Proposed Wording (cont.)

Annex O

No. 22

**Question:** Does the blending of base stocks alone constitute manufacturing?

**Answer:** Base stock blending may be part of the manufacturing process but does not alone constitute manufacturing of a base stock. All base stock components used to blend a base stock must be produced by a single base stock manufacturer; blended to meet the same manufacturer’s specification for that base stock; and identified by a unique formula, product identification number, or both.

No. 23

**Question:** Are there any geographical restrictions on the manufacturer?

**Answer:** The base stock definition in API 1509, Annex E.1.2.1, states that a base stock is independent of manufacturing location as long as the base stock is produced by a single base stock manufacturer to the same specification, the base stock meets the manufacturer’s specification, and the base stock is identified by a unique formula.
Q.1.3.3 Section 3

Volatility, as measured by either the NOACK or ASTM simulated distillation method, is included in the standard because volatility has been shown to correlate with oil consumption in the field [2, 3]. The values were selected to provide acceptable oil economy in the field. The higher allowable volatility values specified for the lighter viscosity grade oils are an acknowledgment of the difficulties encountered with existing refining equipment and/or processes when manufacturing the lighter base stocks necessary for such oils. There is a real need to improve this limit over time, and base oil stock manufacturers should make plans to modify equipment and/or processes to satisfy future requirements that will likely be more stringent.

R.1.2.5 A Base Stock is a lubricant component that is produced by a single base stock manufacturer to the same specifications (independent of feed source or manufacturer’s location); that meets the same base stock manufacturer specification; and that is identified by a unique formula, product identification number, or both. Base stocks may be manufactured using a variety of different processes including but not limited to distillation, solvent refining, hydrogen processing, oligomerization, esterification, and rerefining. Blending alone or the rebranding of base stocks from another manufacturer does not constitute manufacturing. Rerefined stock shall be substantially free from materials introduced through manufacturing, contamination, or previous use.
E.1.1 INTRODUCTION

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These Guidelines define the minimum acceptable level of testing for interchanging a base oil stock that every marketer must perform as a condition for obtaining a license.
F.2.2 Base oils-stocks introduced from other manufacturers shall be tested in accordance with Annex E.

F.4.3 BALL RUST TEST (ASTM D6557)

If there is one passing Ball Rust Test (BRT) (ASTM D6557) in the core data set as defined by the ACC Code, read-across is allowed to all other viscosity grades and base oil stock slates.

F.4.5 HIGH TEMPERATURE CORROSION BENCH TEST (ASTM D6594)

If there is one passing High Temperature Corrosion Bench Test (HTCBT) (ASTM D6594) in the core data set as defined by the ACC Code, read-across is allowed to all other viscosity grades and base oil stock slates.

F.5.2 Base oils-stocks introduced from other manufacturers shall be tested in accordance with Annex E.
Examples

Example 1

Company A contracts with Company B to produce base stocks according to the specifications of Company A. These base stocks are produced in a facility operated by Company B according to the quality system dictated by Company A, e.g. feed selection and batch release testing protocols, and are marked under Company A’s brand.

Company A is considered the base stock manufacturer per E.1.2.4. However, Company B could manufacture its own brand of base stocks if it meets the definition of E.1.2.4.

Example 2

Company A operates a plant producing base stocks. Part of the output of the plant is marketed by Company A, is represented by Company A’s brand, and is produced according to Company A’s specifications. Another part of the output is marketed by Company B, is represented by Company B’s brand, and is produced according to the specifications of Company B. The base stock specifications for the output marketed by Company A and the output marketed by Company B may or may not be equivalent.

Company A is considered the manufacturer of the fraction of the plant’s base stock output that is marketed under its brand whereas Company B is considered the manufacturer of the plant’s base stock output marketed under B’s brand. Both Company A and Company B, per E.1.2.2 may decide to define one or more base stock slates for their branded base stocks.
Example 3

Company A purchases a series of base stocks from Company B. Company B is the manufacturer of these base stocks according to E.1.2.4; they are branded by Company B and produced to Company B’s specification.

Company A can enter into an agreement to resell this series of base stocks under Company B’s brand. Company A cannot be considered the manufacturer of these base stocks.