

## TEMPLATE FOR SENDING COMMENTS ON BIS DOCUMENTS

Date:		Document No.:	PCD 25 (23378)P	Title of the Document:	<b>Food Grade and Biodegradable Greases</b>	
Name of the Commentator/ Organization:		Collated			Abbreviation of the Commentator/Organization:	

(Comments on each clause/subclause/table/fig, etc be started on a fresh box. Information in column 5 should include reasons for the comments/suggestions for modified wordings of the clauses when the existing text/provision is found not acceptable. Adherence to this format facilitates Secretariat's work)

Abbreviation of the Commentator/Organization	Clause/Subclause No. (e.g. 3.1)	Paragraph No. / Figure No. / Table No. (e.g. Table 1)	Type of Comment <sup>1)</sup>	Comments/Suggestions along with Justification for the Proposed Change	Proposed Change/Modified Wordings	Committee Decision
(1)	(2)	(3)	(4)	(5)	(6)	(7)
Waxpol	4.1		Te	Any exclusion of materials, such as rosin, rosinate, rosin oils, tar oil, grit, clay, talc, bentonite, and silica, should be well-substantiated and rooted in sound reasoning rather than appearing arbitrary.		These are materials restricted in all kinds Li and Li-Ca greases
Waxpol	4.2		Te	The imposition of compositional restrictions on certain thickeners and base oils may impede product development aimed at achieving higher performance levels.		Specifications will differ for different compositions; hence this document is being developed for Li and Li-Ca based thickeners
RDSO	4.3	Table 1, sl. No. i)	Te	should not differ by more than 30 units from the 60 double strokes	Grade 1: 265-295 after Roll stability test should be 265-295 (+/-30) hence it should not be in percentage but should be change units after test	Not agreed.  The change in penetration after roll stability is given in percentage from the initial penetration value measured.
Waxpol	4.3	Table 1, sl. No. v)	Te	The CEC-L-33-A-94 method, originally developed by the Coordinating European Council (CEC) in the 1970s, has largely been replaced by OECD 301B/ASTM D5864.	It is recommended that the committee deliberates on whether to proceed with a shorter test, such as CEC-L-33-A-94, for primary biodegradation, or to opt for a more comprehensive test like OECD 301B to assess complete biodegradation.	Agreed, requirement to be changed to 60 as per OECD 301B.  BIS to examine availability of ISO standards for biodegradability test.

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(1)	(2)	(3)	(4)	(5)	(6)	(7)
Waxpol	4.3	Table 1, sl.no. xvi)	Te	It is important to acknowledge that ASTM D4289 relies on highly specific elastomers that are available only from a limited number of suppliers in North America.	If this standard is chosen, we must ensure that the necessary test specimens are easily obtainable in India.	BIS to send request to grease manufacturers for data related to volume change percent, hardness change, and availability of test specimens for this test.  A request may be forwarded to PCD 01 for development of indigenous test method.
Waxpol				The selection of low-temperature requirements should be in alignment with the prevailing operating conditions in India.		The temperature and test method are acceptable for Indian conditions and also prescribed for other Li based greases

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