

ATC Position on regulating deposit control additives in Europe

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The European Additive Technical Committee (ATC), representing the vast majority of the European additive business, welcomes the current EU policy approach on the use of deposit control additives and would like to discourage any further regulatory action, in the context of the ongoing assessment of the Fuel Quality Directive.

Status of the current EU market

- Industry stakeholders and regulators agree that deposit control additives reduce the formation of deposits in engines, with associated positive fuel economy and emission benefits.
- ATC estimates indicate that over 95% of the EU27 on-road retail fuel is currently treated with performance additives, at or beyond the level required EN228 and EN590 specifications.
- This gives European fuel a high quality, enabling the efficient use of vehicle engines and providing greater fuel economy and environmental protection to EU citizens.
- The current European Fuel Quality Directive recognises that and requests the European Commission to regularly assess the need for “*the increase in the use of detergents in fuels*” (art.9d 2009/30/EC)
- The current European fuel standards – EN228 and EN590 – also recommend the use of additives.
- European consumers enjoy a recognized high quality of fuel, due to the competitive nature of the market which incentives suppliers to deliver solutions for real-life consumer’s needs by differentiating their products in the market.
- There is no reason to believe that the current positive position on EU fuel quality could shift

US policy experience on additive mandate

- US policy-makers recognise the essential role of additives in keeping engine clean and improving fuel quality.
- In 1995 US EPA passed a legislation mandating the use of additives.
- In spite of the legislator’s expectations, from 1995 the US additive market dropped dramatically, due to the lack of the market incentive to differentiate by delivering the best performing product to costumers.
- Consequentially, the quality of fuel also decreased, to the detriment of consumers and environment.
- The market recovered only later, when the industry managed to create a new market-based product niche (so called Top Tier) which still exists.

Based on the above facts, ATC encourages European legislators to maintain the existing approach and refrain from mandating the use of additives in the EU market.

Additive Definition & Terminology

ATC defines a fuel additive as: *A chemical substance or preparation, added to fuel, in concentrations typically of less than 1%, to impart or enhance desirable properties or to suppress undesirable properties*

In the context of the FQD evaluation, ATC would also request the European Commission to replace the incorrect wording of “detergents” with the official definition of “deposit control additives”. That would greatly help avoid confusion with other type of detergents.