



12 July 2019

Mr. Brett Gurney
Utah Weights and Measures Program Manager
Chairman of the Board, National Conference on
Weights and Measures

Via email: bgurney@utah.gov

Subject: Proposed Modification to Hydraulic Tractor Fluid Labeling

Dear Mr. Gurney:

I am writing to address the recommendations on label changes proposed in Amended Pub 16 – Block 4. The proposal recommends the following language be included on the label:

2.XX.2.1. Container Labeling. – The label on a container of tractor hydraulic fluid shall not contain any information that is false or misleading. Containers include bottles, cans, multi-quart or liter containers, pails, kegs, drums, and intermediate bulk containers (IBCs). In addition, each container of tractor hydraulic fluid shall be labeled with the following:

- (a) the brand name;**
- (b) the name and place of business of the manufacturer, packer, seller, or distributor;**
- (c) the words “Tractor Hydraulic Fluid,” which may include words such as “Hydraulic Fluid for Agricultural Applications” or “Universal Tractor Transmission Oil”;**
- (d) the primary claim or claims met by the fluid and reference to where any supplemental claims may be viewed (e.g., website reference). Performance claims are those set by original equipment manufacturers;**
- (e) any obsolete equipment manufacturer specifications should be clearly identified as “obsolete” and accompanied by the following warning on the front package label in clearly legible font size and color:**

Caution: Some of the specifications are no longer deemed active by the original equipment manufacturer. Significant harm to the transmission, hydraulic system, seals, final drive or axles is possible when using this product in applications in which it is not intended.

The above warning is not required if the fluid claims to meet current original equipment manufacturer’s specifications and refers to thereby preceding specifications.

While we agree that it is important to ensure consumers and customers are provided information on the correct application for these products, we believe that the proposed wording described in (e) above would be impractical to include on front labels.

- 1) This is counter to standard labeling you find in this category, as well as other consumer categories such as cleaners, detergents and OTC medications. In reviewing several categories, specific information on the products detailed application, how to use the product, proper dosage, and where not to use the product, are all on the back label. Consumers are used to finding this information on the back label.
- 2) There is little to no room to put such a long statement (42 words) on the front label, particularly for companies using bi-lingual labels. This wording would be particularly hard to accommodate on smaller package labels, such as 1 quart or 1 gallon packs unless printed in a font so small as to make it hard for the consumer to read.
- 3) If it is decided that there needs to be some caution on the front label, we would suggest that it should be an alert for consumers to read the back label for important application usage such as "*Caution: See back label for proper application*".

Thank you for your consideration of our feedback. We look forward to working with you on this item and responding to any questions that you may have.

Sincerely,

David Gannon

Marketing Manager – Commercial Vehicle Oils and Industrial
BP Lubricants

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