

DEPARTMENT OF TRADE AND INDUSTRY

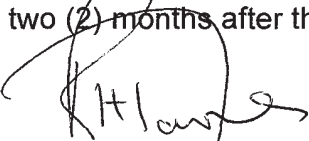
NO. 609

18 SEPTEMBER 2015

**NATIONAL REGULATOR FOR COMPULSORY SPECIFICATIONS ACT
(Act 5 of 2008)****PROPOSED AMENDMENT TO THE COMPULSORY SPECIFICATION FOR
HYDRAULIC BRAKE AND CLUTCH FLUID - (VC 8013)**

It is hereby made known, under Section 13 (4) of the National Regulator for Compulsory Specifications Act (Act 5 of 2008) that I, Dr Rob Davies, the Minister of Trade and Industry, intends to amend the Compulsory Specification for Hydraulic Brake and Clutch Fluid (VC 8013), as set out in the attached Schedule.

Any person who wishes to comment on the intention of the Minister to thus amend the Compulsory Specification concerned, may submit their comments in writing to the Chief Executive Officer of the National Regulator for Compulsory Specifications (NRCS), Private Bag X25, Brooklyn, 0075, on or before the date two (2) months after the publication of this notice.



Dr Rob Davies, MP
Minister of Trade and Industry

SCHEDULE

COMPULSORY SPECIFICATION FOR HYDRAULIC BRAKE AND CLUTCH FLUID

1 Scope

This specification covers the requirements for fluid of the non-petroleum and non-silicone types suitable for use in automotive hydraulic brake and clutch systems.

The specification also covers the packaging and marking requirements for consumer and non-consumer brake and clutch fluid.

2 Definitions

For the purposes of this specification, the definitions given below and those given in SANS 1905, *Hydraulic brake and clutch fluid*, shall apply.

2.1

packaged (product)

commodity that is packed in a container, made up as a unit, for which the quantity has been determined and indicated on the package before being offered for sale.

2.2

bottler/packager

person/entity who fills containers and/or packs the brake fluid under their own or a client's brand name or trademark.

2.3

consumer package

package that is customarily produced for sale to final purchasers through retail sale.

2.4

non-consumer package

any package, i.e drum, intermediate bulk container, intended solely for transportation and/or wholesale distribution to packager/bottler or anyone whom the manufacturer or the importer supplies, except to the retail market or to the public.

3 Requirements

Hydraulic brake and clutch fluid shall comply with the requirements of SANS 1905:2007 *Hydraulic brake and clutch fluid*, except for the packing and marking, and administrative requirements.

4 Packaging and marking requirements

4.1 General requirements

The markings shall be in one of the official South African languages.

The manufacture, importer and packager/bottler shall be responsible for ensuring that packages comply with the requirements of this clause at all times and shall put in place the necessary control measures to ensure effective control of the packing process.

4.2 Requirements for manufacturers and importers

4.2.1 General requirements

The manufacturer or importer shall ensure that the non-consumer package shall be in such a condition that it is not detrimental to the quality of the brake fluid during transportation and storage.

The manufacturer or the importer shall furnish the bottler/packager or anyone to whom they supply the non-consumer packaged brake fluid, with their name, batch identification number and certificate of analysis for traceability purposes.

The manufacturer or the importer must ensure that the bottler/packager brand name or trade mark is registered with the Regulatory Authority.

The manufacturer's or importer's name may be supplied in a code format that will be allocated by the Regulatory Authority, e.g. "NRCS XXXX".

If the commodity is imported using the importer's name instead of the manufacturer's name, the name shall be qualified by a phrase that reveals the connection with the product, for example "manufactured for ...", "distributed by ...", "imported by ...".

4.2.2 Marking for non-consumer package

Package shall be marked as follows;

- commodity's proper name: "HYDRAULIC BRAKE AND CLUTCH FLUID,
- manufacturer name or trademark,
- batch identification number.

4.3 Requirements for bottlers/packager

4.3.1 General requirements

The identity and description of the product shall be of a conspicuous feature, be in such type size and so positioned as to make it easy to read, understood and identified.

4.3.2 Marking for consumer package

Package shall be marked as follows;

- description of the product, "HYDRAULIC BRAKE AND CLUTCH FLUID", or in cases where it is only used for one application, it should be clearly stated, i.e. "HYDRAULIC CLUTCH FLUID ONLY",
- bottlers/packager brand name or trade mark,

- name of the manufacturer or importer in code allocated,
- place of business of the packer/bottler, either physical address or postal address or both,
- batch number, with traceability to source,
- grade,
- boiling points of equilibrium reflux and wet equilibrium reflux,
- standard(s) to which brake fluid complies with, and
- with the following safety warnings;
 - i) *“Keep brake and clutch fluid clean as contamination with dirt, water, petroleum products or other materials may result in brake and clutch failure”,* or words to that effect, and,
 - ii) *“Keep container clean and tightly closed to prevent absorption of moisture”.*

5 Equivalent requirements

The requirements of the national standard stated in the appropriate table 1 shall be deemed to have been met if compliance with the equivalent standard given in column 4 of the same table, or to any of their later amendment levels is achieved, providing that the requirements of clauses 5.2.2, *Equilibrium reflux boiling point at a pressure of 101,325 kPa*, and 5.2.3, *Wet equilibrium reflux boiling point at a pressure of 101,325 kPa*, of SANS 1905, *Hydraulic brake and clutch fluid*, are complied with.

TABLE 1 – Equivalent standards that shall be deemed to comply with SANS 1905

1	2	3	4
Item	SANS No.	Dated	UN ECE
Hydraulic brake and clutch fluid	1905	2007	SAE J1703/4
			ISO 4925
			FVMSS 116

Annexure A

Administrative Process - Hydraulic Brake and Clutch Fluid

1. The Applicant shall formally submit a request for approval for hydraulic brake and clutch fluid intended to be manufactured, imported or packaged, in writing to the Regulatory Authority, providing information of his/her intention to request approval for hydraulic brake and clutch fluid.
2. The Regulatory Authority shall forward to the Applicant the relevant approval application documents for hydraulic brake and clutch fluid, requested in 1 above. The application documents shall stipulate the information to be submitted to the Regulatory Authority, and these shall accompany the submitted application.
3. The Applicant shall complete the application and provide the necessary requested supporting documentation, and forward it to the Regulatory Authority. The appropriate fee for the approval, as determined by the Minister by Notice in the Government Gazette, shall be paid to the Regulatory Authority.
4. Upon receipt of the completed application and the required documents, the Regulatory Authority shall review the documents for correctness, completeness, and authenticity. Incorrect documentation, or insufficient documentation, will be reported to the applicant, for his/her correction.
5. The Regulatory Authority shall inspect the sample of hydraulic brake and clutch fluid and verify it against all mandatory requirements and the submitted evidence of conformity in the application documents.
6. Any non-compliances identified in 5 above, shall be resolved by the Applicant, to the satisfaction of the Regulatory Authority.
7. Once the approval process establishes that the hydraulic brake and clutch fluid complies with all the relevant mandatory requirements, the Regulatory Authority shall issue a formal Letter of Compliance (Approval Letter), to the applicant.
8. The original application documents, and copies of supporting evidence of compliance documents, as necessary, shall be taken, and maintained as Approval Records, by the Regulatory Authority.

Source of evidence

The evidence of compliance to any of the requirements in this compulsory specification, which requires testing to establish compliance, and a test report issued, will only be recognized by the Regulatory Authority, from the following sources:

- 1) A laboratory that is part of an international or regional mutual acceptance scheme, or
- 2) A laboratory that is accredited to ISO/IEC 17025 by SANAS or an ILAC affiliated accreditation body, or
- 3) The laboratory has been successfully assessed against the requirements of ISO/IEC 17025 to the satisfaction of the Regulatory Authority.