Focus on The Better Brakes Rule

A Hazardous Waste and Toxics Reduction Program

October 2013

Guidance for Marking Brake Friction Material

The Department of Ecology (Ecology) has received questions about how to mark brake friction materials to comply with the requirements of the Better Brakes Rule, Chapter 173-901 WAC\(^1\). The Better Brakes Rule requires brakes sold in Washington to be marked according to SAE J866, an industry standard. SAE J866 as designed enables people throughout the supply chain to identify the information contained in an edge code quickly and easily.

SAE J866, Industry Standard

To summarize SAE J866, brakes must be marked with the following information, in the following order:

1. Manufacturer identifier
2. Friction formula identifier
3. Hot and cold coefficients of friction (Not required in Washington – but are required by several other states.)
4. Optional batch code or other optional information
5. Environmental designator and year of manufacture

SAE J866 says, “The environmental markings are to be the last characters in the edge code string with no additional alpha or numeric characters following.” When the edge code cannot be placed on a single line of text, it is read from top-to-bottom and left-to-right. Markings should be clearly legible. It is acceptable to place the markings under a clip or shim, provided it may be removed and replaced by hand without damaging the part, to read the markings underneath.

Brake Markings

What you mark on your brake friction material must be exactly what you report to Ecology when certifying your product. You must report the manufacturer identifier and the friction formula identifier. Ecology will reject certification documents with edge codes that clearly do not comply with SAE J866, such as “LW” or “9769.”

\(^1\) Washington Administrative Code
It is preferable to mark brakes with an edge code in a single line of text, but Ecology understands that there are a variety of marking technologies. Many are often used in combination with each other and some brakes have limited room for markings. These factors can make marking the edge code in a single line of text difficult or impossible. Manufacturers should make a good faith effort to mark their products as described in J866. A brake marked with each of the required pieces of information in a manner that does not obscure the environmental markings is in substantial compliance with the Washington State brake friction material marking requirements.

Illustrated Examples of Acceptable Marking Locations
There are likely situations that are not shown below, in these cases mark products with each of the required pieces of information in a top-to-bottom and left-to-right format. Do not place additional characters after the environmental markings. Please note that while the examples illustrate markings on the back plate, the same logic applies to marking on the edge of the lining.

Washington State Also Requires Marking of Brake Packaging
Under the Better Brakes Rule, brake packaging must be marked with a registered certification mark that is intended to certify compliance with the Better Brakes Rule.