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16 July, 2021

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To whom it may concern

Lubo Global Innovation, Kortgene, Netherlands has requested Triskelion to verify whether their product is suitable is suitable for use in food processing machines in view of the EU Regulation and Dutch legislation. For this purpose, detailed information on the composition was provided.

Project and sample details:

Client : Lubo Global Innovation, Kortgene, Netherlands

Project number : P30002-30084 Preceding project : P10617-114

Sample description : Lubricant for threaded bolts (hereafter referred to as 'Sample')

Date of issue : July 2021 (re-evaluation)
Validity period : July 2021 – July 2024

Evaluation : This evaluation is valid for the validity period given above, or until

any change in the product composition, in the production process or in the legal requirements affects the final conclusions, whichever comes first. Prolongation after the validity period has expired will

require a new sample evaluation.

Relevant Legislation:

- Commodity Act Packaging and Food Utensils Regulation of The Netherlands of 20 November 1979 and its amendments up to and including 1699641-206280-VGP of 12 June 2020 (chapter 10.8).
- Regulation (EC) No 1935/2004 of 27 October 2004 on materials and articles intended to come into contact with food

The investigation comprised the following determinations:

Administrative check of the composition of the 'Sample'.

Results:

The client has confirmed that the composition and the production process of the 'Sample' have not changed since the 'Sample' and the compositional information were evaluated in the preceding project. We have re-evaluated the compositional information in view of the current 'Relevant Legislation'. In the context of the 'Relevant Legislation', the 'Sample' is considered as a coating (Commodity Act Packaging and Food Utensils Regulation of The Netherlands, chapter 10.8).

Based on the re-evaluation, the composition of the 'Sample' is in accordance with the requirements of the current 'Relevant Legislation'. The following condition applies: the purity requirements of the component graphite (as mentioned in Commodity Act Packaging and Food Utensils Regulation of The Netherlands, part B) must be met; this could not be verified by Triskelion. No migration tests are required based on the 'Relevant Legislation'.



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Conclusion:

Given the composition, the 'Sample' is suitable for use as lubricant for threaded bolts in food processing machines according to the 'Relevant Legislation'.

On the basis of the re-evaluation and provided that the composition and the production process of the 'Sample' have not changed, and provided that the purity requirements of the component graphite are met, the statement is prolonged until July 2024. Prolongation after the validity period has expired will require a new sample evaluation.

Approved by

D. J. M. Snelders, Ph.D.

Project Manager Food Contact Materials