



DATE 16 July, 2021

OUR REFERENCE P30002-30084
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To whom it may concern

Lubo Global Innovation, Kortgene, Netherlands has requested Triskelion to verify whether their product 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



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To whom it may concern

Lubo Global Innovation, Kortgene, Netherlands has requested Triskelion to verify whether their product is in accordance with the Code of Federal Regulations of the USA. For this purpose, samples as well as detailed information on the composition were provided.

Project and sample details:

Client	:	Lubo Global Innovation, Kortgene, Netherlands
Project number	:	P30002-30084
Preceding projects	:	P10617-113 and 093.20544/01.35
Sample description	:	Lubricant for threads (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 including extraction tests.

Relevant Legislation:

- FDA 21 Code of Federal Regulations of the USA of 1 April 2020, §175.300.

The investigation comprised the following determinations:

- Administrative check of the composition of the 'Sample'.
- FDA extraction tests according to FDA 21 CFR 175.300(c)(4).

Results:

The results were described in detail in the statement of project number P10617-113 (administrative check) and analytical report ARPC/13-664/VEH of project number 093.20544/01.35 (extraction tests). 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 projects. We have re-evaluated the compositional information, as well as the analytical results, in view of the updated 'Relevant Legislation'.

The composition of the 'Sample' and the results of the extraction tests are still in accordance with the requirements of the updated 'Relevant Legislation'.



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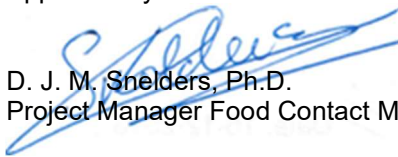
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Conclusion:

Given the composition and the values obtained for the relevant extraction tests, the 'Sample' can be used for contact with all food types, under repeated use conditions and employed other than as a component of a container and under conditions E through G (maximum room temperature with no thermal treatment).

On the basis of the results obtained in the preceding projects P10617-113 and 093.20544/01.35 and provided that the composition and the production process of the 'Sample' have not changed, the statement is prolonged until July 2024. Prolongation after the validity period has expired will require a new sample evaluation including extraction tests.

Approved by


D. J. M. Snelders, Ph.D.
Project Manager Food Contact Materials

Dalfsen, October 2016

Declaration: SDS non-hazardous mixtures – Lubo Lubrication

According to article 31 of REACH a supplier shall provide the recipient at his request a safety data sheet compiled in accordance with Annex II, where a mixture does meet the criteria for classification as hazardous in accordance with CLP* regulation EC1272/2008.

There are also some specified limits for certain specified classified components as mentioned in article 31 (3) a, b and c of REACH* Annex II 2015/830) wherefore a SDS is obligated.

Whenever a mixture does not meet above mentioned requirements it's not obligated to provide a safety data sheet of the mixture.

We have evaluated the recipe of Lubo Lubrication and concluded that there is no substance in the recipe classified as hazardous according to EC1272/2008.

Kind regards,
Mrs. D.C. de Jager

HSE-specialist

CLP*: Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures

REACH**: Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals

This declaration is based on supplied substance information.

Goldkampstraat 41-1

7722 RN Dalfsen

T: 06-25390056

F: 084-7257339

E:danielle.dejager@dcconsult.nl

W:www.dcconsult.nl

VATno: NL104972543B01

IBAN: NL13 RABO 01218 81 679

BIC: RABONL2U



LUBO LUBRICATION

DE VERVANGING VOOR MONTAGEPASTA



TIJD- EN KOSTENBESPAREND



MILIEU- EN MENSVRIENDELIJK



SCHOON IN GEBRUIK



EC 1935/2004

KENMERKEN

- Voorkomt koudlas
- Tijd- en kostenbesparend
- Milieu – en mensvriendelijk
- Bevat geen dierlijke vetten
- Schoon in gebruik
- Lubrication zit alleen op schroefdraadgedeelte
- Laag en constant wrijvingscoëfficiënt
- Machinaal verwerkbaar
- Demonteerbaar na 1500 uur zoutsproeitest
- Bruikbaar i.c.m. diverse borgmiddelen
- Inzetbaar van -120 °C tot + 1400°C
- Voldoet aan FDA, EC 1935/2004 en ELV (2004/53/EG)

TOEPASSINGEN

Toepasbaar op alle soorten (RVS) schroefdraden zoals bouten, studbolts, draadeinden, hydraulische koppelingen en specials. De voorbehandelde schroefdraadverbindingen zijn toepasbaar in de voedingsindustrie, farmaceutische industrie, machinebouw, offshore, zeevaart, industrie en weg -en waterbouw.



STOP MET SMEREN, START MET MONTEREN.

Lubo Lubication, de vervanging
voor montagepasta

BIJZONDERE EIGENSCHAPPEN

De kant en klare bevestigingsmaterialen zijn volledig FDA & EC 1935/2004 compliant en kunnen direct uit de verpakking worden gebruikt. De droge smering voorkomt dat het RVS zich vast vreet. De Lubo Lubricant zit namelijk al om de schroefdraad van de bout. Het enige dat u hoeft te doen is de bout erin draaien. Nabehandelingen of andere smeermiddelen zoals montagepasta's zijn niet meer nodig. Daarnaast werkt het lubricant ook met hoge snelheden, waardoor het nog eenvoudiger kan worden gemonteerd. Herstelwerkzaamheden zoals slijpen, boren en tappen zijn verleden tijd. Het gevolg: een grote besparing op monteurs-uren.



Lubo International®
SMART LUBRICATION FOR PARTS

Het Rip 9
4493 RL Kamperland
Telefoon: +31 (0)113 30 21 02
E-mail: info@lubointernational.com

www.lubointernational.com