

REACH-compliance declaration

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Products: NODUST, STARLIG and STARBOND (all brands)
Type: Lignosulfonic acid, magnesium, calcium, ammonium or sodium based
lignosulfonates
Legal entities: LignoStar International BV and its suppliers of the above mentioned substances

Dear Customer,

As described by the European Commission from meeting with the Competent Authorities on 17 October 2008, revised version 4.5 - 07 August 2012 (<http://echa.europa.eu/en/support/faqs/frequently-asked-questions/frequently-asked-questions-about-reach> section 6.3.11) chemically modified natural polymers and their theoretical monomers are exempt from REACH registration requirements.

Following article 2(9) of REACH Regulation, any polymer meeting the criteria of Article 3(5) of the Regulation does not have to be registered. This includes natural polymers which are chemically modified as well.

Monomer substance(s) or other substance(s) in the form of monomeric units in chemically bound substance(s) originating from the natural polymer can for practical reasons be treated as “non-isolated intermediates” and do not have to be registered. The substances used to chemically modify the natural polymer (e.g. metal bisulphites) and which are chemically bound within the final polymer need to be registered according to the REACH requirements. All producers and suppliers to LignoStar International have gone through this process and preregistered these modifying agents.

As such, it is not required to (pre-)register lignosulphonates or the pre-cursors to these polymers. This means that:

Lignosulfonates are exempt from REACH-registration obligations

We will however, be working with the supply chain to ensure that substances used during the manufacture of StarLig lignosulphonates fully comply with REACH.

No confirmations of “Relevant uses for the substance(s)” are necessary:

Because there is no obligation in registering the Lignosulfonates, there is also no need in issuing a registration dossier. Therefore, it is not necessary to add any chemical uses in a registration dossier. In our opinion, the client is solely responsible in selling or applying of these products in the different applications. Specific legislation has to be observed (e.g. for food-, feed or plant protection applications).

Meanwhile, if you have any further questions, please do not hesitate in contacting us further.

LignoStar International B.V.