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1 2021-11-10 | KRAFT LIQUORS REACH CONSORTIUM



Consortium for Kraft lignin

Background:

- When Kraft lignin is separated from the black liquor and delivered as a product to a third party it is defined as a chemical substance.
- Kraft lignin is exempted from REACH registration since it is a natural polymer, but the CLP obligations and other requirements in REACH do apply.
 - REACH requires that a Safety Data Sheet is provided to the third party.
 - CLP requires that the substance is classified, labeled and packaged correctly. The legal entity must identify all relevant information publicly available about the hazards of the substance and evaluate its quality. Furthermore, the CLP regulation says that new information concerning physical hazards are always necessary to obtain but the entity is not obliged to generate new toxicological or eco-toxicological data for the purpose of classification.
 - CLP also requires, if the substance is classified as hazardous that a notification to the C&L inventory shall be done. The goal is that all companies that have made a C&L notification shall come to an agreement on the classification.



Summary of Classification and Labelling

Notified classification and labelling

General Information

EC / List no.	Name	CAS Number			
617-145-6	Lignin, alkali	8068-05-1			

Notified classification and labelling according to CLP criteria

Classification		Labelling				Classification affected by	Additional Notified	Number of	Joint							
Hazard Class and Category Code(s)	Hazard Statement Code(s)	Hazard Statement Code(s)	Supplementary Hazard Statement Code(s)	Pictograms, Signal Word Code(s)	Specific Concentration limits, M-Factors	Notes	the second s	Information	Notifiers	Entries						
Eye Irrit. 2	H319	H319		GHS07 Wng				Chata (Francisco)	4.57		View					
STOT SE 3	H335 (not specified)	H335			Wng				State/Form	157		details				
Not Classified									33							
Skin Sens. 1	H317	H317		GHS07 Wng				State/Form	16		View details					
Skin Irrit. 2	H315	H315		GHS07 Wng												
Skin Sens. 1	H317	H317											State/Form	1		View details
Eye Irrit. 2	H319	H319														
Skin Irrit. 2	H315	H315		GHS07 Wng	GHS07							View				
Eye Irrit. 2	H319	H319						State/Form	1		details					
Skin Irrit. 2	H315	H315		GHS07 Wng												
Eye Irrit. 2	H319	H319								1		View				
STOT SE 3	H335 (Respiratory tra) (Inhalation)	H335									details					



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Objective

- Cooperate and share costs to fulfill the CLP obligations.
- Reach an agreement on the classification of Kraft Lignin.

How

- Collect and evaluate existing data and studies, obtain relevant data and elaborate a stepwise testing strategy and conduct agreed new studies.
- Budget for all tasks will be approved by <u>all</u> members.
- All decisions are agreed by <u>all</u> members. Not answering = agree with majority.
- We follow the Cefic Competition law compliance guidance.
- Once objective is achieved, we will end the cooperation and all companies are owners of the obtained data.



Consortium for Kraft lignin

- This is now a stand-alone consortium not a working group within Kraft Liquors REACH Consortium as first suggested.
- AFRY has the role as the secretariat and if you are interested to join, please contact:
 - linnea.lovgren@afry.com
 - ulrika.persson@afry.com

