



Tracegrow Oy

EC Fertiliser - Declaration of Compliance

5.9.2018

Dear valued Tracegrow customer,

Tracegrow is committed to conducting our worldwide operations in an environmentally, socially and ethically responsible manner, complying with all applicable laws and regulations of those countries where we do business.

This commitment includes the placing of EC fertiliser products on the market in full compliance with the Regulation (EC) No 2003/2003 of the European Parliament and of the Council relating to fertilisers.

The information below addresses our compliance with the applicable requirements of the Regulation (EC) No 2003/2003 relating to fertilisers with respect to Tracegrow products.

EC Regulation relating to fertilisers

The European Union Regulation (EC) No 2003/2003 relating to fertilisers applies to mineral fertilisers, granting products that meet the requirements of the regulation the status of an 'EC' fertiliser.

Tracegrow's fertiliser products, which utilize the vital trace elements from spent alkaline batteries, have officially received an End-of-Waste status. The product legislation that is the fertiliser regulation therefore applies to Tracegrow's products.

Fertiliser requirements

All fertiliser products of Tracegrow fulfill the necessary requirements of the Regulation (EC) No 2003/2003 relating to fertilisers in order to achieve the EC status; they provide micronutrients in an effective manner that does not harm human, animal or plant health or the environment under normal conditions. Tracegrow's products are subject to relevant sampling, analysis and test methods on a regular basis, for each product batch, to ensure consistent and high quality.

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All Tracegrow products are assigned applicable type designations in accordance with section E - "Inorganic micro-nutrient fertilisers" of Annex I of the Regulation. The micronutrient products are only to be used where there is a recognized need, at appropriate dose rates as instructed by the manufacturer.

The minimum micronutrient contents in accordance with the relevant type designations of Annex I, section E of the Regulation are always met in Tracegrow's micronutrient fertilisers. Where secondary nutrients are present, their presence and concentrations are indicated clearly.

The concentration of contaminants in Tracegrow's products are very low, and magnitudes smaller than the permitted quantities proposed in the upcoming EU fertiliser regulation proposal COM(2016)157 for the type designation "PFC 1(C)(II): Inorganic micronutrient fertiliser", as confirmed by regulatory sampling by the Finnish Food Safety Authority Evira. Certificates of compliance can be provided for each produced batch upon request.

Traceability, labelling and packaging

The fertiliser products of Tracegrow are marked as EC fertilisers. Tracegrow maintains up-to-date records of the origin of its fertiliser raw materials, in order to ensure continuous traceability of its products.

The markings, identification, labelling and packaging of the EC fertiliser products placed on the marked by Tracegrow comply with the requirements of the Regulation (EC) No 2003/2003, as well as with the requirements of the CLP Regulation ((EC) No 1272/2008) on classification, labelling and packaging of substances and mixtures.

Relevant product data sheets and safety data sheets are always provided to customers, where required. Safety data sheets are compiled in accordance with the REACH Regulation ((EC) 1907/2006) on the Registration, Evaluation, Authorisation and Restriction of Chemicals.

Declaration of Compliance

We hereby certify that the fertiliser products manufactured and marketed by Tracegrow fulfill all the relevant requirements of the Regulation (EC) No 2003/2003 relating to fertilisers and are in full compliance with the Regulation as EC fertilisers.

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We further declare that all the statements in this letter are true and accurate. For any information or inquiries, please send an email to: Mikko Joensuu, Operations Director at mikko.joensuu@tracegrow.com



Tatu Leppänen

CEO

Tracegrow

5.9.2018