

Andreas Th. Bausch GmbH & Co. KG · Daimlerstraße 1-2 · D-21423 Winsen/Luhe

Antalis A/S
Att. To Mr. Andersen
Bastrupgaardvej 8-10
DK - 7500 Holstebro

21.04.2023

Declaration of Conformity

Ansprechpartner: Christoph Bausch (Durchwahl: -15)

E-Mail: christoph.bausch@bauschpapier.de

We hereby confirm that we have declarations of conformity from the papermill, which produces the:

Recycling brown kraft paper, 50 gsm, reels 55 cm, 250 m

which we delivered to you.

The papermill declares, that their packaging paper is determined for food contact and it meets the requirements of Commission Regulation (EC) No 2023/2006 on good manufacturing practice for material and articles intended to come into contact with food.

We further confirm that we have received a document, the contents of which are excerpted below:

According to Regulation (EC) No. 1935/2004 of the European Parliament and of the Council the articles shall not cause deterioration in the organoleptic characteristics of food.

Conditions for use of the Attest and associated information:

- 1. The Attest applies only to the sample tested by our laboratory**
- 2. The Attest remains in effect until production technology, initial materials and standards or corresponding regulations are changed; however, its validity will extend beyond the period of its effect.**
- 3. If further requirements of national or EU legal regulations apply to the product, the Attest does not replace procedures and documents necessary for assessment of compliance with these regulations.**

Evaluation of the measured parameters:

The evaluated parameters mentioned on the pages 3 – 12 of the Attest **meet** hygienic requirements for **the products made of paper** given by Health Ministry Decree No. 38/2001 Coll., "Hygienic requirements for materials intended to come into contact with foodstuffs", as amended and German Recommendation BfR (Bundesinstitut für Risikobewertung - Federal Institute for Risk Assessment) XXXVI Paper and cardboard for food contact (including the requirements for recycled fibres).

The evaluated samples do not cause a deterioration in organoleptic characteristics of food.

The evaluated samples meet requirements of the article 3 of **Regulation (EC) No. 1935/2004 of the European Parliament and of the Council** on materials and articles intended to come into contact with food.

This Attest was issued on the basis of the accredited test reports Ref. No. 472114923-01 and Ref. No. 4721014923-02 issued on February 22, 2022.

Issued on: February 22, 2022

Valid till: February 28, 2025

Values obtained

Test results taken from the test report Ref. No. 472114923-01

Assessment of organoleptic properties

Food simulant		CSN EN 1230-2 biscuits		CSN EN 1230-2 chocolate		CSN EN 1230-1 without food simulant
Assessor No.	Unit	Odour	Odour	Odour	Flavour	Pach
1	level	0	0	0	0	0
2	level	0	0	0	0	0
3	level	0	0	0	0	1
4	level	0	0	0	0	0
5	level	0	0	0	0	1
6	level	0	0	0	0	0
Mean	level	0	0	0	0	0.5

Off-odour and off-taste scale:

0 = No perceptible off-odour or off-taste

1 = Just perceptible off-odour or off-taste (off-odour and off-taste determination is very difficult)

2 = Slightly perceptible off-odour or off-taste

3 = Clearly perceptible off-odour or off-taste

4 = Strong off-odour or off-taste

Test results according to the requirements of Suppl. No. 12 to Decree No. 38/2001 Coll.

Parameter	Unit	Value obtained ¹	Limit ²
Assessment of the paper material			
Moisture	%w/w	7.11±0.03	max. 8.0
PCB ³	mg/kg of dry matter	< 0.20	max. 2.0
Polychlorinated phenols ⁴	mg/kg of dry matter	< 0.05	max. 0.05
PAH ⁵	mg/kg of dry matter	< 0.01	max. 0.05
Content of the substances in the leachate (20 dm² / 1000 ml of distilled water, (20±2) °C / 24 h)			
Formaldehyde	mg of CH ₂ O / dm ²	< 0.01	max. 0.10 max. 1.0 ⁷
Total nitrogen	mg of N / dm ²	< 0.03	max. 0.2
Phthalates ⁶	mg/dm ²	< 0.02	max. 0.20
Primary aromatic amines	mg/dm ²	_ 8)	max. 0.002
Phenolic compound	mg of phenol / dm ²	< 0.01	max. 0.05
Fluorescence (365 nm)	-	- ⁸	No fluorescence
Mercury	mg/kg of dry matter	< 0.05	max. 0.3
Cadmium	mg/kg of dry matter	< 0.05	max. 0.5
Chromium	mg/kg of dry matter	< 0.05	max. 0.1
Lead	mg/kg of dry matter	< 0.05	max. 3.0
Arsenic	mg/kg of dry matter	< 0.05	max. 3.0

Notes to the table:

1. Symbol „<“ means less than limit of detection of the analytical method. The test results are expressed including the reported expanded uncertainty based on a standard uncertainty multiplied by a coverage factor of k=2, providing a level of confidence of approximately 95%
2. Limit values according to the Ministry of Health Decree No. 38/2001 Coll., as amended
3. PCS – polychlorinated biphenyls, sum of congeners 28, 52, 101, 118, 138, 153 and 180
4. Polychlorinated phenols expressed as pentachlorophenol
5. PAH – polycyclic aromatic hydrocarbons; sum of: benzo/b/fluoranthene, benzo/k/fluoranthene, benzo/a/pyrene, dibenzo/a,h/anthracene, benzo/g,h,i/perylen, indeno/1,2,3-c,d/pyrene expressed as benzo/a/pyrene
6. Sum of dibutyl phthalate (DBP), di-(2-ethylhexyl) phthalate (DEHP), diisodecyl phthalate (DIDP), benzylbutyl phthalate (BSP), diisononyl phthalate (DINP), di-n-octyl phthalate (DNOP)
7. Limit value according to German Recommendation BfR XXXVI Paper and cardboard for contact with foodstuffs
8. The alternative test was performed – see the tables on the pages 6-8

Test results according to the requirements of German Recommendation BfR XXXVI
Determination of metals in the leachate (acc. to CSN EN 645)

Parameter	Unit	Value obtained ¹	Limit ²
Cd - Cadmium	mg/l of extract	< 0.001	max. 0.005
Cr - Chromium	mg/l of extract	< 0.005	not-detectable
Pb - Lead	mg/l of extract	< 0.005	max. 0.01
Al - Aluminium	mg/l of extract	0.25±0.07	max. 1.0

Notes to the table:

1. Symbol „<“ means less than limit of detection of the analytical method.
2. Limit value according to BfR XXXVI Paper and cardboard for contact with foodstuffs

Determination of fastness of fluorescent whitened paper according to CSN EN 648 procedure A -
long-term contact

Simulant	Unit	Value obtained ¹
Distilled water	level	5
3% acetic acid	level	5
Alkaline salt solution (pH 8.6)	level	5
Olive oil	level	5
Limit ²	level	Min. 5

Notes to the table:

1. 5 level correspondend to the zero content of fluorescent brighteners that migrate into filter paper = good fastness
2. Limit value according to BfR XXXVI Paper and cardboard for contact with foodstuffs

Determination of glyoxal according to DIN 54603 in the leachate (acc. to CSN EN 645)

Parameter	Unit	Value obtained ¹	Uncertainty ²	Limit ³
Glyoxal content	mg/dm ²	0.0016	0.0003	max. 1.5
	mg/kg of dry matter	2.70	0.40	-

Notes to the table:

1. Symbol „<“ means less than limit of detection of the analytical method.
2. The reported expanded uncertainty is based on a standard uncertainty multiplied by a coverage factor of k=2, providing a level of confidence of approximately 95%
3. Limit value according to BfR XXXVI Paper and cardboard for contact with foodstuffs

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Determination of primary aromatic amines (PAAs) in leachate

leachate: distilled water, (20±2) °C/24 h; 10 g / 250 ml

Primary aromatic amine (PAA)	CAS No.	Unit ¹	Test result ²	Limit ³
PAAs classified as carcinogens in classes 1A and 1B of the CLP Regulation (EC) 1272/2008				
4-Amino-biphenyle	92-67-1	mg/kg	< 0.002	N.D.
Benzidine	92-87-5	mg/kg	< 0.002	N.D.
4-Chlor-o-toluidine	95-69-2	mg/kg	< 0.002	N.D.
2-Naphthylamine	91-59-8	mg/kg	< 0.002	N.D.
o-Aminoazotoluene	97-56-3	mg/kg	< 0.002	N.D.
p-Chlor -aniline	106-47-8	mg/kg	< 0.002	N.D.
2,4-Diamino-anisole	615-05-4	mg/kg	< 0.002	N.D.
4,4'-Diamino-diphenylmethane	101-77-9	mg/kg	< 0.002	N.D.
3,3'-Dichlor-benzidine	91-94-1	mg/kg	< 0.002	N.D.
3,3'-Dimethoxy-benzidine	119-90-4	mg/kg	< 0.002	N.D.
3,3'-Dimethyl-benzidine	119-93-7	mg/kg	< 0.002	N.D.
3,3'-Dimethyl-4,4'-diaminodiphenylmethane	838-88-0	mg/kg	< 0.002	N.D.
p-Keresidine	120-71-8	mg/kg	< 0.002	N.D.
4,4'-Methylen-bis(2-chloraniline)	101-14-4	mg/kg	< 0.002	N.D.
4,4'-Oxy-dianiline	101-80-4	mg/kg	< 0.002	N.D.
4,4'-Thio-dianiline	139-65-1	mg/kg	< 0.002	N.D.
o-Toluidine	95-53-4	mg/kg	< 0.002	N.D.
2,4-Toluenediamine	95-80-7	mg/kg	< 0.002	N.D.
2,4,5-Trimethyl-aniline	137-17-7	mg/kg	< 0.002	N.D.
o-Anisidine	90-04-0	mg/kg	< 0.002	N.D.
o-Aminoazobenzene	60-09-3	mg/kg	< 0.002	N.D.
Screening for others	4	-	No PAA detected ⁵	-
Sum of detected PAAs	-	mg/kg	-	max. 0.01

Notes to the table:

- Expressed as mg of the substance per kg of food simulant.
- Symbol „<“ means less than limit of detection of the analytical method
- Limit values according to Commission Regulation EU 10/2011 as amended
- These PAAs were screened – GAS No. 95-68-1, GAS No. 87-62-7, GAS No. 2243-62-1, GAS No. 62-53-3, GAS No. 95-51-2, GAS No. 108-42-9, GAS No. 106-49-0, CAS No. 106-50-3, GAS No. 823-40-5, CAS No. 121-69-7, GAS No. 6582-52-1, GAS No. 1208-52-2, GAS No. 6358-64-1, GAS No. 95-82-9, GAS No. 94-70-2, GAS No. 2835-68-9, GAS No. 81-16-3, GAS No. 88-44-8, GAS No. 49564-57-0, GAS No. 95-23-8, GAS No. 132-32-1, GAS No. 95-54-5, GAS No. 67014-36-2, GAS No. 156-43-4, CAS No. 90-41-5, GAS No. 99-55-8
- LOD (limit of detection) of individual PAA is 0,005 mg/kg
N.D. = not detectable; limit of detection 0,002 mg/kg

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Determination of Kathon (CAS 55965-84-9) in the leachate (acc. to CSN EN 645)

Parameter	Unit	Value obtained ¹	Limit ²
5-Chloro-2-methyl-3(2H)-isothiazolone with 2-methyl-3(2H)-isothiazolone (3:1) (Kathon), CAS 55965-84-9	µg/dm ²	< 0,1	max. 25

Notes to the table:

1. Symbol „<“ means less than limit of detection of the analytical method.
2. Limit value according to BfR XXXVI Paper and cardboard for contact with foodstuffs

Test results of the specific migration of substances restricted by SML

Parameter	Unit ¹	Value obtained ²	Limit ³
Specific migration into distilled water, 20 °C / 24 h			
Ethyleneglycol, CAS 107-21-1 and diethyleneglycol, CAS 111-46-6	mg/kg	< 8.8 ⁴	max. 30 ⁴
Diethanolamine, CAS 111-42-2	mg/kg	0.10±0.02	max. 0,3

Notes to the table:

1. Expressed as mg of substance per kg of simulant for the migration ratio 60 cm² / 100 ml
2. Symbol „<“ means less than LOD (limit of detection) of the analytical method. The test results are expressed including the reported expanded uncertainty based on a standard uncertainty multiplied by a coverage factor of k=2, providing a level of confidence of approximately 95%.
3. Limit values according to Commission Regulation (EU) No 10/2011, as amended
4. The sum of these substances expressed as ethyleneglycol

Test results of the specific migration of substances restricted by SML in recycled papers according to German Recommendation BfR XXXVI

Parameter	Unit ¹	Value obtained ²	Limit ³
Specific migration into distilled water, 20 °C / 24 h			
4,4-bis(dimethylamino)benzophenone, CAS 90-93-7	Mg / kg	< 0,00002	max. 0,01
Diethylhexyl phthalate, CAS 117-81-7	Mg / kg	< 0,00002	max. 1,5
Di-n-butyl phthalate, CAS 84-74-2	Mg / kg	< 0,00002	max. 0,3
Diisobutyl phthalate, CAS 84-69-5	Mg / kg	< 0,00002	max. 0,6
Benzophenone, CAS 119-61-9	Mg / kg	< 0,00002	max. 0,05
Bisphenol A, CAS 80-05-7	Mg / kg	< 0,00002	max. 0,05
Bisphenol S, CAS 80-09-1	Mg / kg	< 0,00002	max. 0,02

Notes to the table:

1. Expressed as mg of substance per kg of simulant for the migration ratio 60 cm² / 100 ml
2. Symbol „<“ means less than LOD (limit of detection) of the analytical method. The test results are expressed including the reported expanded uncertainty based on a standard uncertainty multiplied by a coverage factor of k=2, providing a level of confidence of approximately 95%.
3. Limit value according to BfR XXXVI Paper and cardboard for contact with foodstuffs

Determination of diisopropylnaphthalene

Parameter	Unit	Value obtained ¹	Uncertainty ²
Diisopropylnaphthalene content	mg/kg of dry matter	1.08	0.12
Diisopropylnaphthalene - specific migration into MPPO ³ (40±2) °C, 10 days	mg/dm ²	< 0.002	-

Notes to the table:

1. Symbol „<“ means less than LOD (limit of detection) of the analytical method.
2. The reported expanded uncertainty based on a standard uncertainty multiplied by a coverage factor of k=2, providing a level of confidence of approximately 95%.
3. Limit values according to Commission Regulation (EU) No 10/2011, as amended
4. Modified polyphenyleneoxide

Overall migration determination

Food simulant	Unit	Value obtained ¹		Analytical tolerance ²	Limit ³
		Single results	Average		
MPPO ⁴ , (40±2) °C / 10 days	mg/dm ²	<2; <2; <2	<2	3	max. 10

Notes to the table:

1. Symbol „<“ means less than LOD (limit of detection) of the analytical method.
2. Analytical tolerance to CSN EN 1186-1, article 12.3
3. Limit values according to Commission Regulation (EU) No 10/2011, as amended
4. Modified polyphenyleneoxide

Test results of the transfer of antimicrobial constituents according to CSN EN 1104

Bacillus subtilis (BGA) spore suspension	Test microorganisms Aspergillus niger, CCM 8155
No inhibition zone - no transfer of water-soluble antimicrobial constituents	No inhibition zone - no transfer of water-soluble antimicrobial constituents

Sample description and identification:

ITC's number	Sample identification by client	Description of Submitted sample
14923/1	<<brand name of the paper>> Basis weight 65 gsm	Brown paper as A4 sheets

Together with the samples, the client provided information on the composition and recipe of individual products and safety data sheets of raw materials. Due to the very similar recipes of all submitted samples, the test were performed in whole scope required by legislative only on the <<brand name of the paper>> as a type representative of the product line. The selected tests for health safety evaluation were performed on the <<brand name of the paper>>.

Work requested:

Evaluation of hygienic properties of the sample according to Decree of Health Ministry No. 38/2001 Coll. *for articles intended into a contact with foodstuffs*, as amended, in compliance with Law of Czech Republic No. 258/2000 Coll. *about protection of the public health*, as amended and according to German Recommendation BfR XXXVI *Paper and cardboard for foodstuffs*.

The evaluation of hygienic properties of the sample is based on European legislation in the sense of Regulation (EG) No. 1935/2004 of the European Parliament and of the Council *on materials and articles intended to come into contact with food*.

Opinions and interpretations:

The evaluated products "Wrapping papers: <<brand name of the paper>> are intended to contact with food. The requirements for products intended to come into direct contact with foodstuffs are given by Decree of the Health Ministry No. 38/2001 Coll., as amended (hereinafter referred to as Decree 38) and by European Parliament and Council Regulation No. 1935/2004 (hereinafter referred to as Regulation 1935). The client required also the assessment according to the requirements of German Recommendation BfR XXXVI *Paper and cardboard for foodstuffs* (hereinafter referred to as BfR XXXVI).

General requirements -decree 38. Regulation 1935. BfR XXXVI

The products intended to come into contact with foodstuffs shall be manufactured so that, under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities which could endanger human health or bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics thereof. The performed tests verified that the evaluated samples do not cause a deterioration of the organoleptic properties of the food (see the tables on the page 2 of this attest). The constituent transferring is discussed further.

Requirements for paper products -decree 38

- Assessment of base materials, additives, adjuvants and the other substances (§ 21, paragraph 1, § 22, paragraph 2) is not a part of this Attest.
- The moisture of products made of paper packaging shall be up to the limit of 8 % w/w. The conformity was proved by the test – see the table and the page 3 of this Attest.
- Paper packaging for direct contact with foodstuffs shall not be used repeatedly – it is not supposed that the products will be repeatedly used.
- The products made of paper, cartons and cardboard shall meet hygienic requirements given by the part

4 of the supplement No. 12. The conformity was proved by the tests and the products meet all limit values. The test results are listed in the tables on the page 3 of this Attest.

Requirements for paper products - BfR XXXVI

- Following requirements are valid for the cold water extract of the final products: maximum of 0.005 mg/kg of cadmium, 0.01 mg/kg of lead and 1.0 mg/l of aluminium. Hexavalent chromium shall not be detectable. The conformity was proved by the test – see the tables on the page 4 of this Attest.
- The final product shall not have preservative effects during foodstuffs contact (see the requirements of DIN EN 1104: Determination of the transfer of antimicrobial constituents) - the conformity was proved by the test and the results are mentioned on the page 7.
- Contents of formaldehyde and glyoxal in the cold water extract of the final product are limited – the conformity was proved by the tests – see the test results in the tables on the pages 3 and 4.
- The cold water extract of the final product shall not contain more than 25 µg/dm² of mixture of 5- chloro-2- methyl-4-isothiazolin-3-one (approx. 3 parts) and 2-methyl-4- isothiazolin-3-one (approx. 1 part) – the conformity was proved by the tests – see the test results in the tables on the page 6.
- Requirements for optical brighteners: The brighteners shall not migrate into foodstuffs - the conformity was proved by the test according to CSN EN 648 -see the test result in the table on the page 4.
- Primary aromatic amines may not be released from the finished food contact material in a detectable amount. The detection limit is 0.01 mg/kg food or food simulant and applies to the sum of the released primary aromatic amines. Additionally, primary aromatic amines classified as carcinogens in classes 1A and 1B of the CLP Regulation (EC) 1272/2008 may not be released referred to the single substance with a detection limit of 0.002 mg/kg food or food simulant – the conformity was proved by the tests – see the test results in the tables on the page 5.
- Substances restricted by SML in recycled papers are listed in Annex to BfR XXXVI. Specific migrations of these substances into distilled water were verified for the submitted samples. Diisopropylnaphthalene content in the mass and its specific migration into simulant E were verified. The test results are listed in the tables on the pages 6 and 7. All test results meet the required limits.

The specific migration of the following substances restricted by SML according to Commission regulation (EU) No. 10/2011 were verified:

- Ethyleneglycol, CAS 107-21-1 and diethyleneglycol, CAS 111-46-6; SML=30 mg/kg (expressed as ethyleneglycol)
- Diethanolamine, CAS 111-42-2, SML=0.3 mg/kg

The test results of the specific migrations including migration conditions are mentioned in the table on the page 6 of this attest. The measured values of the specific migrations meet the required limit values.

The opinion expressed and interpretation made by:
<<Title & Name of the laboratory ingenieur>>, February 22, 2022

Conclusion:

The comparison of the obtained results with the limits of Decree No. 38/2001 Call., as amended, of German Recommendation XXXVI and of the article 3 of European Parliament and Council Regulation No. 1935/2004 and evaluation of the conformity with these regulations are mentioned on the page 1 of this attest.

<<Title, Name & Signature of the Head of the laboratory of analytical chemistry and microbiology>>

The transcript and reproduction of the analysis was only excerpts and to the best of our knowledge and belief.

Best regards

Andreas Th. Bausch GmbH & Co. KG



Christoph Bausch

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