

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

Antalis A/S
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DK - 7500 Holstebro

20.05.2026

Declaration of Conformity - Kistenauslegepapier

Ansprechpartner: Christoph Bausch (Durchwahl: -15)

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We hereby confirm that the following item supplied by us

Illu white, 50 g/m²

an ISEGA food safety certificate is available. This certificate is valid from June 2, 2025, to June 1, 2027.

Below, we provide excerpts from this ISEGA food safety certificate and a statement from the paper mill that we have on file.

ISEGA DECLARATION OF CONFORMITY

The above-mentioned grade is a type of paper used for food packaging and for manufacturing shopping bags for fruits and vegetables.

It has been certified by ISEGA in accordance with the

BfR "Collection of Methods for the Testing of Paper, Cardboard and Paperboard for Food Contact", current version, in conjunction with the BfR Guidance Document "Testing of Substance Migration from Articles Made of Paper, Cardboard and Paperboard" dated 28 September 2023,

for the raw materials, manufacturing aids, and special paper finishing agents used, as well as for the release of substances that may be harmful to health.

The paper quality complies with the provisions of the

Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC, Official Journal of the European Union L 338/4 of 13 November 2004, as last amended by Article 5 of Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 6 September 2019, Article 3(1)(a) and (b)

as well as the

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The German Food, Consumer Goods and Animal Feed Code (Food and Animal Feed Code – LFGB) as published on 15 September 2021 (Federal Law Gazette I p. 4253, 2022 I p. 28), last amended by Article 11 of the Act of 6 May 2024 (Federal Law Gazette 2024 I No. 149), Sections 30 and 31,

and is approved in accordance with the

BfR Recommendation XXXVI: Paper, cardboard and paperboard for food contact, revised by 62nd Circular, Bundesgesundheitsblatt 14 (1971) 83, last amended by 227th Communication, Federal Health Gazette 67 (2024) 968–970, as at 1 August 2024

The paper quality, as demonstrated by the sample material provided by the manufacturer, is therefore safe for use in food packaging and in the manufacture of carrier bags for fruit and vegetables. It may come into direct contact with dry, non-greasy foods and foods that are peeled or washed before consumption, and may also be used as secondary packaging. In the case of dry, non-greasy foods with a large surface area, particular attention must be paid to the transfer of volatile and hydrophobic substances via the gas phase. This can be addressed, for example, by the additional use of suitable intermediate packaging.

In addition, the paper mill provided us with the following statements:

WASTE PAPER RECYCLING

The paper mill operates a fully integrated production process for recycled paper. Waste paper sourced from the market is processed in one of Europe’s most modern stock preparation plants (DIP) in accordance with the requirements of the recycled paper to be produced, in order to ensure optimum fibre quality for the end products.

Chemical additives are used in the stock preparation process to ensure that operations are carried out in the most resource-efficient manner possible. During the preparation of the waste paper, process-chlorine-free (PCF) bleaching agents are used as required.

ENVIRONMENTAL CRITERIA

The paper mill holds various eco-labels and certifications, which are only awarded if the relevant requirements regarding organisation and the use of resources and chemical additives are met:

- Blue Angel DE-UZ14a (“Use of 100% recycled paper”) FSC (“Forest Stewardship Council”)
- PEFC (Programme for the Endorsement of Forest Certification Schemes) DIN EN ISO 9001 (Quality Management)
- DIN EN ISO 14001 (“Environmental management”) DIN EN ISO 50001 (“Energy management”)

Resources are used as sparingly as possible. For example, water is reused in various cycles, which has enabled us to reduce specific water consumption by around 20% over the last 10 years. Consumption of electrical and thermal energy has also been reduced by 20% in recent years.

EU REGULATION 1907/2006 (SVHC, REACH)

The additives used in pulp processing and paper production comply with the relevant legal requirements (e.g. REACH) and the environmental labels held by the paper mill. They do not fall within the SVHC category (substances of very high concern).

Substances listed in Annex XVII of the REACH Regulation are not used in our processes.

EU REGULATION 2019/1021 (POPS REGULATION, STOCKHOLM CONVENTION)

Our products consist of paper in the broad sense and recycled paper in the narrower sense. Our products are neither chemicals nor preparations.

Our papers comply with the requirements of EU Regulation 2019/1021 (persistent organic pollutants)

Substances and chemicals explicitly named in the legal texts are not used during the manufacturing process, either as raw materials or as additives in raw and auxiliary materials.

It cannot be ruled out that our papers may contain ubiquitous traces of persistent organic pollutants, which can be found everywhere on the Earth’s surface

EU REGULATION 528/2012 (BIOCIDAL PRODUCTS REGULATION)

Our papers comply with the requirements of EU Regulation 528/2012. Our products are papers that do not have a primary biocidal function. Consequently, our products are not classified as 'biocidal products'. Industry-standard additives that are effective against microbes are used in the production processes. All additives used for this purpose comply with the requirements of EU Regulation 528/2012 and have been approved for use in the European Union.

EU REGULATION 2023/2006 (GOOD MANUFACTURING PRACTICE)

Our company maintains a certified quality management system in accordance with DIN EN ISO 9001, complete with the relevant documentation, in order to comply with the requirements of EU Regulation 2023/2006.

EU REGULATION 2023/1115 (EUDR – DEFORESTATION-FREE SUPPLY CHAINS)

EU REGULATION 995/2010 (EUTR – TIMBER REGULATION)

Our paper is made from 100% recycled paper. For this reason, the EUDR – like the previous EUTR – does not apply to our recycled paper products. The recycled paper used to manufacture our products is sourced within Europe. As we use recycled paper in our processes, we are unable to provide information on either the types of fibre or their geographical origin.

EU REGULATION 2023/988 (GENERAL PRODUCT SAFETY)

This EU Regulation applies to 'products' used by end consumers, as defined in the Regulation. As a rule, our recycled papers are not intended for direct use by end consumers. Our recycled papers comply with the requirements of the General Product Safety Regulation, and the paper mill complies with the requirements applicable to 'manufacturers' as defined in the Regulation.

EU DIRECTIVES 2011/65/EU AND 2015/863/EU (ROHS DIRECTIVE)
RESTRICTION OF HAZARDOUS SUBSTANCES IN ELECTRICAL AND ELECTRONIC EQUIPMENT

The EU directives mentioned apply to electrical and electronic equipment and their components. The papers produced by the paper mill are not intended for use as components of electrical and electronic equipment and are not tested or assessed with regard to potential use in this category. We are unable to provide any further information regarding the RoHS Directive.

EU DIRECTIVE 94/62/EC (DIRECTIVE ON PACKAGING AND PACKAGING WASTE)
PACKAGING ACT (VERPACKG) IN GERMANY AND OTHER EU COUNTRIES

The paper produced by the paper mill is always packaged in a way designed to prevent or minimise any adverse effects on the paper during transport and storage.
Typical packaging materials used by the paper mill:

Sheet goods.....	Paper (PAP 22)
Disposable or Euro pallet	Wood (FOR SO)
Stretch/shrink film.....	Polyethylene (PE-HD 02)
Films	Polyethylene (PE-HD 02)
Corner protectors	Cardboard (PAP 21, PPK)
Labels	Paper (PAP 22; PPK)
Pallet covers	Wood (FOR SO)
Strapping.....	Polyester (PET 01)

The use of packaging materials is limited to the minimum required for technical and technological reasons. The packaging materials used can be sorted by type and recycled in accordance with local regulations and conditions at the user's premises.
Thermal recycling of the packaging materials is also possible.

The categories of packaging materials used are indicated on the labels of the packages (recycling symbol with the corresponding number, see above).

Our company and our products comply with all the requirements set out in the German Packaging Act.

PH-NEUTRAL PAPER

Our paper is manufactured using pH-neutral processes.

COMPOSTABILITY DIN EN 13432

In general, paper consists mainly of biodegradable material (natural fibres). Some of our papers have been subject to external testing regarding their compostability.

RECYCLABILITY

Our recycled papers are manufactured from waste paper and the additives commonly used in the paper industry. As a result, our recycled papers (in the condition in which we sell them to our customers) are fully reusable in standard industry recycling processes and by waste paper processing companies, and are therefore recyclable.

If the customer applies coatings or other finishes to or within the paper, no statement can be made regarding the recyclability of these further processed products.

VEGAN/VEGETARIAN – INGREDIENTS OF ANIMAL ORIGIN IN THE PAPER

All substances and additives actively incorporated into our processes are either products of the chemical industry or of purely plant-based origin. We do not carry out animal testing ourselves, nor do we commission such testing.

We are unable to estimate the extent to which the waste paper used in the production of our recycled papers may contain non-vegan components, even if only in small quantities.

Note: The assessment of chemicals etc. in terms of their impact on flora and fauna is carried out using various toxicity reference values for aquatic organisms and/or mammals (e.g. LD₅₀ in rats). This information is listed in every safety data sheet (e.g. for printing inks, adhesives etc. in the paper processing chain). To what extent animal testing is (or must be) carried out in this context is beyond our knowledge.

SULPHUR IN PAPER

No sulphur-containing raw materials or additives that remain in the paper are used in the manufacturing processes. It cannot be ruled out that the paper may contain traces of sulphur, due, among other things, to the use of recycled paper

CHLORINE IN PAPER

Any bleaching agents used in the manufacturing processes do not contain chlorine or chlorine-containing substances (PCF – process chlorine-free). It cannot be ruled out that the paper may contain traces of such substances, due, among other things, to the use of recycled paper.

PFAS (PER- AND POLYFLUOROALKYL SUBSTANCES) IN PAPER

PFAS are not actively used in our processes. Nor are PFAS used as an 'active' ingredient in the chemical additives we employ.

It can be assumed that PFAS are also present in the waste paper cycle and are therefore highly likely to be at least detectable in our papers.

Testing of our papers for these substances is not currently required under any of our environmental certifications. For this reason, we are unable to provide any information regarding PFAS levels in our papers.

CALIFORNIA PROPOSITION 65 (CA PROP65)

TOXIC SUBSTANCES CONTROL ACT (TSCA)

We are unable to comment on this US regulation in relation to our products.

REGULATION (EU) 2017/821

USE OF 'CONFLICT MINERALS'

This EU regulation does not apply to paper. The paper mill does not import any of the materials mentioned into the EU. We are unable to comment on this in relation to our products.

DODD FRANCK ACT

We are unable to comment on this US regulation in relation to our products

Best regards from northern Germany
Andreas Th. Bausch GmbH & Co. KG



Christoph Bausch

☞ Bauschpapier ist zertifiziert nach ISO 9001:2015 + HACCP ☞

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