

Declaration of Compliance Product Safety Information

Pergo, Pergo-Star® white, brilliant white wet strength for baking purposes

1. Company details

Company name	
Address- Physical address	Adolf-Pfleiderer-Str. 19
Town-ZIP	94244 Teisnach
Phone	0049/9923/29-0
Quality Management	Dieter Schürmann
Phone	09923/29-169
E-Mail	d.schuermann@pfleiderer-spezialpapiere.de

2. Management systems

No.	Management system	Status	Remarks
2.1	Quality Management System according to ISO 9001:2015	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	https://www.pfleiderer-spezialpapiere.com/english/service/downloads/
2.2	INREKA Certification Standard for Hygiene Management Systems; "Hygiene Management and Product Safety Concept....." based on EN 15 593 "Packaging -Management of hygiene in the production of packaging for foodstuffs - Requirements"	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	https://www.pfleiderer-spezialpapiere.com/english/service/downloads/
2.3	HALAL-Reference: - GSO/UAE 2055-1:2015 - OIC/SMIIC 1:2011 - MS 1500:2009 - AS 23000-1 - UIS-HC-S001	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	https://www.pfleiderer-spezialpapiere.com/english/service/downloads/
2.4	Kosher Certificate - manufacturing practice for paper to come into contact with food	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	https://www.pfleiderer-spezialpapiere.com/english/service/downloads/
2.5	We produce according to the regulation EU regulation No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food („GMPRegulation"). Basis are the guidelines from the CEPI (= Confederation of the European Paper Industries): "Good Manufacturing Practice for the Manufacture of Paper and Board for Food Contact" Issue 1 (2010) <u>and</u> "Industry Guideline for the Compliance of Paper & Board Materials and Articles for Food Contact" Issue 2 (2012)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
2.6	Resolution der EU RESAP (2002)1 „Papier und Karton zur Verpackung von Lebensmitteln" - RESOLUTION RESAP (2002) 1 ON PAPER AND BOARD MATERIALS AND ARTICLES INTENDED TO COME INTO CONTACT WITH FOODSTUFFS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
2.7	FSC Management System: Chain-of-Custody according FSC-STD-40-004 V3-0 Delivery on customer requirement!	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	https://www.pfleiderer-spezialpapiere.com/english/service/downloads/
2.8	PEFC Management System: Chain-of-Custody according PEFC ST 2002:2013 Delivery on customer requirement!	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	https://www.pfleiderer-spezialpapiere.com/english/service/downloads/

RG Deggendorf HR A 11

Managing Director:

Rainer Koder
Manfred Bröckl
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No.	Management system	Status	Remarks
2.9	Energy Management System according to ISO 50001:2011	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	https://www.pfleiderer-spezialpapiere.com/english/service/downloads/
2.10	Environmental Management System according to DIN EN ISO 14001	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	
2.11	AEO- Authorized Economic Operator	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	https://www.pfleiderer-spezialpapiere.com/english/service/downloads/

3. Information on delivered product(s)

Product description/Brand name	Application
Pergo, Pergo-Star white, brilliant white wet strength	Packaging paper for direct contact with dry, moist and fatty foodstuffs. Furthermore they may be used for baking purposes in conventional as well as in microwave ovens at a temperature of up to 220° degrees

Product certification for food contact:

Yes

No

3.1 Status of the compliance with the following regulations, recommendations and laws

No.	Regulation, recommendation, law	Status	Remarks
3.1.1	REGULATION (EC) No 1935/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on materials and articles intended to come into contact with food (especially art. 3 + 17)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.2	COMMISSION REGULATION (EU) No 10/2011 on plastic materials and articles intended to come into contact with food	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
3.1.3	Foodstuffs and Animal Feed Gode - LFGB; by article 4 para. 19 of the Law, §§ 30 and §§ 31	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.4	German Recommendation XXXVI (Paper and board for food contact)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.5	German Recommendation XXXVI/2 (Paper and Paperboard for Baking Purposes)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.6	FDA Regulation 21 CFR § 176.170 a) Components of paper and paperboard in contact with aqueous and fatty food	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.7	FDA Regulation 21 CFR § 176.180 Components of paper and paperboard in contact with dry food	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.8	Swiss Ordinance on Foodstuffs and Utility Articles (FUAO) article 49 (only for virgin fibres)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.9	Decreto Ministeriale 21 Marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.10	Verpakkingen- en Gebruiksartikelenbesluit (Warenwet), Staatsblad 420 of 30 May 2005	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.11	Decret no 92-631 du 8 juillet 1992 relatif aux matériaux et objets destinés à entrer en contact avec les denrées, produits et boissons pour l'alimentation de l'homme ou des animaux, état du 20 janvier 1994	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	

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3.1.12	Decret no 2007-766 du 10 mai 2007 partant application du code de la consommation en ce qui concerne le matériaux et les objets destinés à entrer en contact avec les denrées, alimentaires, dernière modification par le décret no 2009-1083 du 1 septembre 2009, abroge le décret no 92-631 du 8 juillet 1992 relatif aux matériaux et objets destinés à entrer en contact avec les denrées, produits et boissons pour l'alimentation de l'homme ou des animaux	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.13	Brochure no. 1227, Journal Officiel de la République Française	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.14	The colorants in our product are confirm with the requirements of the Recommendation IX of the BfR "Colorants for Plastics and other Polymers Used in Commodities" and Resolution AP (89) "On the use of colorants in plastic materials coming into contact with Food" (13. September 1989)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
3.1.15	Colored papers for food contact: Our quality meet the requirements of the DIN EN 646:2006 "Paper and board intended to come into contact with foodstuffs - Determination of color fastness of dyed paper and board"	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
3.1.16	Optical brightener's in papers for food contact: Our quality meet the requirements of the DIN EN 648:2006 "Paper and board intended to come into contact with foodstuffs - Determination of fastness of fluorescent whitened paper and board"	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	
3.1.17	We don't use any substances of the current "SVHC candidate list" according § 33 and § 57 of the REACH regulation, above than 0.1 per cent relative to the product.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.18	EU-Timber Regulation Nr. 995/2010 "laying down the obligations of operators who place timber and timber products on the market"	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.18	Regulation (EC) No 94/62 of 20 December 1994 on packaging and packaging waste regarding heavy metals, noxious & hazardous substances; Note: the Regulation (EC) No 94 / 62 included the following regulations EN 13427 EN 13428 EN 13429 EN 13430 EN 13431 EN 13432 CR 13695-1 That means also, the content of heavy metals (Pb, Cd, Hg, and Cr); noxious and other hazardous substances in our paper detectable are clearly below 100 ppm!	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
3.1.20	We meet the requirements from the EU regulation 450/2009 on active and intelligent materials and articles intended to come into contact with food	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	There are no active and intelligent materials in use in this paper grade which can modify the food stuff!
3.1.21	EU Labeling allergens listed in Regulation (EU) No 1169/2011 (e.g., fish products, nut products, ...)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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3.1.22	The biocides in our raw materials are compliant with the EU Biocide Ordinance 528/2012 / EC	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3.1.23	French Law No. 2012-1442 from December 2012 for the Suspension of the Manufacture, Import, Export and Marketing off All-Purpose Food Packaging containing Bisphenol A. In this law Bisphenol A was bannend in different articles, especiallv in food packing.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	Due ta suppliers information!

3.2 Substances / Contaminants

With this statement, we confirm whether the substances / contaminants listed below are used during the manufacture of our product or not.

No.	Substances / Contaminants	Status	Remarks
3.2.1	Substances listed in the California Proposition 65 - Safe drinking Water and Toxic Enforcement Act (up-date 2013-02-08)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This paper grade meet the requirements of the BfR 36: Formaldehyde < 1 mg/dm ² (hot water extract)
3.2.2	Registered pesticide	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3.2.3	Wet strength additive´s on basis Epichlorhydrine	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.4	Adsorbable Organic Halogens (AOX) which can contribute ta AOX	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.5	Formaldehyde	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This paper grade meet the requirements of the BfR 36: Formaldehyde < 1 mg / dm ² (hot water extract)
3.2.6	Primarv aromatic amines (paA)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.7	Content of heavy metals	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This paper grade meet the requirements of the BfR 36: Cadmium < 5 µg/l Lead < 10µg/l Chrome (VI) not detectable (in the water extract)
3.2.8	Pentachlorophenol (PCP)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.9	Polvchlorinatedbiphenyls (PCB)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.10	Diispropylnaphthalin (DIPN)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.11	Benzophenone	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.12	4-Methylbenzophenone	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.13	Volatile Organic Carbons (VOC)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	< 0,1 %
3.2.14	Phthalates - Di-ethylhexylphtalate - Di-n-butylphtalate - Di-isobutylphtalate	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.15	Alkyl Phenol Ethoxvlate (APEO)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.16	Nonyl Phenol Ethoxylate (NPE)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.17	Latex from natural rubber	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.18	Animal derived ingredients (Glycerin CAS 56-81-5 and similar)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.19	Ethanol	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.20	Genetically Modified Organisms (GMOs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not intentionally added
3.2.21	Fluor and fluorinated compounds	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Fluor and its compounds are substances in grease proof additives!

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3.2.22	Perfluorooctyl sulfonate (PFOS) and its precursor Perfluorooctylsulfonamide	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.23	Perfluorooctanoic acid (PF0A) and its precursors, like 8-2 telomere alcohols	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.24	Complexing agents(for example NTA, EDTA, DTPA)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.25	All kinds of Bisphenol's (for example A, S, F)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.26	Polycyclic Aromatic Hydrocarbons (PAH) and Aromatic Hydrocarbons	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.27	Triclosane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.28	Hexachlorocyclohexane (HCHs)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.29	Brominated Flame Retardants	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.30	Ozone Depleting Substances (ODS)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.31	Organo Tin Compounds	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.32	Nitrosamin	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.33	Epoxy Derivate (for example. BADGE, NODGE etc.) according to EC No. 1895/2005	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.34	Substances listed in the Global Automotive Declarable Substance List (GADSL)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.35	Dual Use Additives	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.36	Gluten	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.37	Quaternary Ammonium compounds with the active substances Benzalkonium Chloride (BAC) and Didecylammonium Chloride (DDAC)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.38	Mineral oil substances, like - MOAH Mineral Oil Aromatic Hydrocarbons with a carbon chain 10 until 25	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.39	Mineral oil substances, like - MOSH Mineral Oil Saturated Carbons with a carbon chain 10 until 25	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.40	Recovered Paper	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
3.2.41	Optical Brightener	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
3.2.42	With Nanotechnology produced Substances	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.43	Soybean oil, epoxidised (ESB0)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.44	Preserving agents Thiazolinone, Isothiazolinone, o-Phenylphenols	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.45	Photoinitiators in adhesives and dyes (for example ITX and others)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.46	Polyvinyl Chloride (PVC) and Polyvinylidene Chloride (PVDC)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.47	Anthraquinone and Anthraquinone substances	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.48	Diethanolamine, often abbreviated as DEA or DEOA; for example - Lauramide (DEA) - Oleamide (DEA) - Myristamide (DEA)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.49	Benzoyl peroxide / Dibenzoyl peroxide (BP0)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.50	Potassium bromate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.51	Silicone or Silicone compounds	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.52	3-monochloro-1,2-propanediol (3-MCPD esters) or 1,3-Dichloropropene (= 1,3 DCP)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.53	Glycol ether compounds	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.54	Semicarbazide, also Hydrochloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added

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3.2.55	Nitrofurazone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.56	Glyoxal	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.57	4,4'-Bis(dimethylamino)benzophenon (= Michlers Keton)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.58	Bronopol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.59	2-(Dimethylamino)ethylacrylate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.60	Dimethylamine	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.61	Acrylamide	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.62	Acrylic resins	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.63	Styrene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added
3.2.64	Vegetal adhesive	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Not intentionally added

3.3 Specific Migration Limits (SML-Values)

According the COMMISSION REGULATION (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food.

No.	Substance	CAS-No. or FCM-Substance No. from the EU No. 10/2011	SML-Value in mg/kg Food
	Melamine	108-78-1	< 2,5

The actual results of the migration analysis were below the detection limits or far below the specific migration limits!

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This Declaration of Compliance is based on

- a own evaluation of the recipe with statements of our suppliers and on a regular basis our products are analyzed and evaluated.
- The investigation include chemical and physical analysis according to the German recommendation XXXVI.
- Further we perform suitable migration analysis through external labs.

All stated laws, regulations and adjustments including the most recent changes, if any, have been considered with effect of the issuing date.

Also we perform microbiological test with our paper grades for food contact without any negative results.

Thus the paper grade ***Pergo, Pergo-Star® white, brilliant white for baking purposes*** may be used safely for food packaging. It may stand in direct contact with dry, moist, fatty and alcoholic foodstuffs. Furthermore they may be used for baking purposes in conventional as well in microwave ovens at a temperature of up to 220° C and as well as in the freezer area..

In terms of very sensitive material, we recommend to store as following:

- Stable temperature: ideal 15° – 30° C (Air-conditioned warehouse)
- Humidity rel. max. 30% – 60% depending on the temperature
- All pallets & reels must be wrapped and unwrapped only just before conversion on your machines- **DO NOT STORE UNWRAPPED MATERIAL!**

We recommend warehousing time not to exceed 180 days.

The declaration of Compliance is valid for a period of 2 years only.

Since the end use of the paper is beyond our direct control, we expect that the customer will satisfy themselves that the paper is suitable for that end use. Unless specifically negotiated, we reserve the right to use raw materials from more than one source whilst still maintaining a commercial match within the terms of this specification.

We confirm

- the accuracy of our information/statements
- to inform our customers on any changes in product formula in good time
- to produce according to specification and guarantee constant, stable product quality

Place, Date

Name / Signature / Stamp

Teisnach, 04.02.2020

Jessica Fuchs
Assistant Managementsystems

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