

To whom it may concern

Environmental, quality and sustainability statement

Due to different question from our customers herewith we made this statement:

waste paper treatment:

Schönfelder Papierfabrik GmbH is operating a fully integrated production of recycling paper. Purchased waste paper is treated within a state-of-the-art modern stock preparation plant (DIP) to reach the optimal fibre quality for the end products.

Within the waste paper treatment some chemicals were used to operate the processes with a resource consumption as low as possible.

The recycling paper of our mill is produced without chlorine bleaching agents (PCF - process chlorine free)

Environmental criteria:

Schönfelder Papierfabrik GmbH is owning a number of environmental signs and certifications. For these we have to fulfil different requirements as use of resources and chemicals:

- Blue Angel DE-UZ14a (Blauer Engel, use of 100% waste paper)
- FSC° ("Forrest 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")

Used resources are used as low as possible. E. g. water is used several times – due to this the specific water consumption could be reduced by 20% within the last ten years.

Use of electrical and thermal energy could be also reduced by 20% within the last years.

EU-Regulation 1907/2006 (SVHC, Reach)

Used chemicals for stock preparation and paper production corresponds to the relevant legal requirements (e. g. REACH) and the owned environmental labels. Used chemicals do not fall within the categories of SVHC ("substances of very high concern").

On request we send a specific statement about SVHC to our customers.

Substances listed in annex VXII of EU-Regulation 1907/2006 are not used in our processes.

EU-Regulation 2019/1021 (EU-POP, Stockholm Convention)

Our product "paper" is neither a chemical nor a preparation.

Our recycling papers corresponded to EU regulation EU 2019/1021 (persistent organic pollutants - POP)

The named chemicals of POP are not used or added in our production aids and internal processes.

We cannot exclude that our paper contains ubiquitous traces of POP, that can be found anywhere on earth.

EU-Regulation 528/2012 (biocidal products)

Our recycling papers corresponded to EU regulation 528/2012.

Our products do not have a primary biocidal function. So, our recycling paper is <u>not</u> a "biocidal product". We use additives in our production processes, which are microbial effective. All of those additives correspond to the EU-regulation 528/2012 and are approved for the use within the European Union.



EU Regulation 1935/2004

BfR recommendation XXXVI - food contact materials

The within our processes used raw and auxiliary substances correspond to the recommendation XXXVI of BfR (Bundesinstitut für Risikobewertung).

For some of our products we offer external certificates of compliance for food contact materials. Potential limitations in the documents have to be noted.

EU Regulation 2023/2006 (GMP - good manufacturing practice)

We have established and maintain a certified quality management system according to DIN EN ISO 9001 with an appropriate documentation to comply with regulation 2023/2006/EC.

EU-Directive 94/62/EC (packaging and packaging waste)

Our recycling paper will be delivered in a suitable packaging.

Typical packaging materials of Schönfelder Papierfabrik:

paper in reels

front side corrugated cardboard (PAP 20; water repellent and anti-slip surface)

lateral surface PE-film (polyethylene; PE-HD 02)

kraft paper (PAP 22; not wet strength, not laminated with PE - upon need)

label paper (PAP 22)

core paper core (PAP 21; note: the core is a part of the product not a part of the

packaging)

core plug polyethylene (PE-HD 02)

paper in sheets

palette wood (FOR 50)

plastic film polyethylene (PE-HD 02)

edge protector cardboard (PAP 21) label paper (PAP 22)

palette cover wood based (FOR 50)

strapping polyester (PET 01)

The use of packaging is limited to the technical/technological minimum.

All of the used packaging materials can be collected and recycled due to the local regulations.

Thermal recycling of the packaging materials is also possible.

The used packaging materials are marked on the products of Schönfelder Papierfabrik.

EU-Directives 2011/65/EU and 2015/863/EU (RoHS-Directive – restriction of hazardous substances in electrical and electronic equipment)

All products with an electrical and electronic component, unless specifically excluded, have to comply with these restrictions.

Our products do not contain electrical or electronic components. The intended use of our recycling paper is within the printing- and converting industry of paper.

We do not check and assess a potential use of our products for the usage in electric or electronical equipment. Further comments to the RoHS-directive are not able for us.

pH-neutral paper (free of acids)

Our paper is made in pH-neutral processes.

Biodegradability of the paper

Paper mainly consists of biodegradable material (natural fibres). Some of our papers were external analysed according to DIN EN 13432.

H:\Produktionsleitung\Silvio\Kundenspezifika\ISO-Dokumente_allgemeine Stellungnahmen etc\M2_FB_018_Statement_SVHC_Bleiche_Zeichen_etc. - usw. umfangreich_DEU-ENG.docx Page 2 von 3



Recyclability of the paper

Our paper is made of waste paper and within the paper industry usual additives. Resulting from this fact our paper is within the usual recycling processes for paper and within waste paper using companies fully usable and therefore recyclable.

We are not able to give any information regarding recyclability, if customers convert our paper in their processes with coating or other materials.

vegan/vegetarian - components derived from animals

All process- and product aids that are used within our processes are either a product of the chemical industry or purely plant based.

We do not test on animals nor do we commission such tests.

Due to the use of waste paper for the production of our recycling papers we are not able to exclude the presence of traces of substances derived from animals in our fibrous raw materials.

Note: The evaluation of chemicals regarding to the impact on flora and fauna is made with comparative figures to the toxicity to aquatic organisms and/or mammals (e. g. LD/LC rat). This information are part of every safety data sheet for substances (e. g. inks, colours, adhesives). How far animal tests are (or must be) carried out is beyond our knowledge.

sulphur in paper

Within our processes we do not use sulphurous raw and auxiliary substances that remain in the paper. We cannot exclude that due to the use of waste paper traces of sulphur can be found.

chlorine in paper

The recycling paper of our Schönfelder Papierfabrik is produced without chlorine bleaching agents (PCF – process chlorine free)

We cannot exclude that due to the use of waste paper traces of chlorine can be found.

PFAS (Per- and polyfluorakyl substances) in paper

PFAS are not added in our production processes. PFAS are also not used as "constitute" part within the used process and product additives. With high probability are PFAS located within the waste paper cycle and thus also detectable in our recycling paper. Currently neither legal requirements nor our environmental certifications do not require examinations for the PFAS-content. We are not able to make a statement about PFAS-content of our recycling papers.

Material safety data sheet (MSDS) for recycling paper

According to legal requirements it is not necessary to create MSDS for paper.

Toxic Substances Control Act (TSCA)

California Proposition 65 (CA Prop65)

We are not able to give any information about this USA regulations regarding to our products.

use of conflict minerals

Regulation EU 2017/821 – This EU regulation about conflict minerals like gold and other minerals is not applicable for paper. Schönfelder Papierfabrik does not import the named minerals and metals into the EU. We are not able to give any information regarding to our products.

Dodd Franck Act – This USA regulation about the use of gold and other minerals is not applicable for paper. We are not able to give any information regarding to our products.

General Management

2023-12-11

F. Cordier

H:\Produktionsleitung\Silvio\Kundenspezifika\ISO-Dokumente_allgemeine Stellungnahmen etc\M2_FB_018_Statement_SVHC_Bleiche_Zeichen_etc. - usw. umfangreich_DEU-ENG.docx

Page 3 von 3