

Dr. Ralph Derra

Öffentlich bestellter und vereidigter Sachverständiger für
Verpackungsmaterialien, Boden- und Luftanalysen;
Sachverständiger in der Wasseranalytik

21 November 2025

Dr. Dr/Kö-do

**UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE**

eingetragen
registered no.
registré

65992 U 25

für
for
pour

LC PAPER 1881 S.A.
Ctra. Besalú - Figueres, km 62
17850 Besalú (Girona)
Spain

Produkt
Product
Produit

Tissue Paper

The product manufactured by the company mentioned above is a tissue base paper which is used for the manufacture of napkins, kitchen towels and toilet paper.

It was examined by us under consideration of the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 28.09.2023,

(BfR "Collection of methods for the examination of paper and board for food contact", current status, in connection with the BfR guideline "Testing of substance transfers from consumer articles made of paper, cardboard and paperboard", as of 28 September 2023).

for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

Furthermore, analyses according to the

DGCCRF - Fiche MCDA n°4 (V02 – 01/01/2019) Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires,

(DGCCRF - MCDA Sheet 4 (V02 - 01/01/2019) Food contact ability of organic materials based on plant fibres intended to come into contact with food),

and a sensory analysis were performed.

The tissue base paper is in compliance with the rules 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 13.11.2004, lastly modified by article 5 of the 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 of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 11 des Gesetzes vom 6. Mai 2024 (BGBl. 2024 I Nr. 149), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021 (BGBl. I. p. 4253; 2022 I p.28), last amended by article 11 of the act of 6 May 2024 (BGBl. 2024 I no. 149), §§ 30 and 31),

and conforms to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu-gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 229. Mitteilung, Bundesgesundheitsblatt 68 (2025) 1212-1216, Stand vom 01.10.2025,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 229th Announcement, Bundesgesundheitsblatt 68 (2025) 1212-1216, as of 1 October 2025),

as well as to the

Hinweise zur Beurteilung von Hygienepapieren, Bundesgesundheitsblatt 39, 123 (1996), Stand vom März 2009,

(Guidelines for evaluating sanitary papers, Bundesgesundheitsblatt 39, 123 (1996), state of March, 2009).

Additionally, it is in compliance with the French

Décret n° 2007-766 du 10 mai 2007 portant application du code de la consommation en ce qui concerne les matériaux et les objets destinés à entrer en contact avec les denrées alimentaires, Journal officiel de la République française n° 0109 du 11 mai 2007, modifié en dernier lieu par décret n° 2011-385 du 11 avril 2011, Journal officiel de la République française n° 0087 du 13 avril 2011,

(Decree no. 2007-766 of 10 May 2007 regarding the application of the consumer code, which concerns materials and articles intended to come into contact with food, Official Journal of the French Republic no. 0109 of 11 May 2007, last modified by Decree no. 2011-385 of 11 April 2011, Official Journal of the French Republic no. 0087 of 13 April 2011),

and meets the demands of the

DGCCRF - Fiche MCDA n°4 (V02 – 01/01/2019) Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires,

(DGCCRF - MCDA Sheet 4 (V02 - 01/01/2019) Food contact ability of organic materials based on plant fibres intended to come into contact with food).

Thus the tissue base paper **Tissue Paper** according to the sample material submitted may be used safely for the intended purpose. The finished products manufactured with it may come into direct contact with foodstuffs as well as with the human skin and the mucous membranes for a short period of time as far as the mentioned tissue base paper is concerned.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision



weitere anerkannter Sachverständiger
zur Untersuchung der Eigenschaften von
Lebensmittelkontaktmaterialien, Papier, Pappe,
Kunststoffe, Klebstoffe und
sonstige Materialien auf ihre
Eignung für den Lebensmittelkontakt


(Behrendt)
Officially certified
and authorized food
chemist



**Staatlich anerkannter Sachverständiger
zur Untersuchung der Gegenproben von
Verpackungsmitteln aus Papier, Pappe,
Kunststoffen, Glas, Weißblech und
sonstigen Metallverpackungen auf ihre
lebensmittelrechtliche Unbedenklichkeit**

Dr. Ralph Derra

Authorized expert for the analyses of packaging materials, attested by the Chamber of Industry and Commerce.

Expert autorisé pour l'analyse des matériaux d'emballage, assermenté par la Chambre d'Industrie et de Commerce.

State registered expert for the analysis of contrasting samples of packaging materials of paper, board, plastics, glass, tin plate and other metallic packaging materials as to their suitability for use with foodstuffs.

Expert public pour l'étude du contrôle des contre-échantillons d'emballages de papier, cartons, plastiques, verre, fer-blanc et d'autres emballages métalliques concernant leur conformité alimentaire.



Dr. Ralph Derra

Authorized expert for the analyses of soil and air, attested by the Aschaffenburg Chamber of Industry and Commerce.

Expert autorisé pour l'analyse du sol et de l'air, assermenté par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

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