

Lebensmittelrechtliche Konformitätserklärung

Für unseren Artikel:

PP-Bodenbeutel 160x270mm

mit der folgenden Artikel-Nummer:

320627

Hiermit bestätigen wir auf der Grundlage der uns vorliegenden Lebensmittelunbedenklichkeitserklärung des Produzenten, dass die von uns oben genannten Artikel für den Kontakt mit Lebensmitteln geeignet sind und den dafür vorgesehenen Gesetzen sowie Richtlinien entsprechen.

Zum eigenen Schutz unserer Lieferquellen sind Vorlieferant und Untersuchungslabor sowie dritte beteiligte Personen unkenntlich gemacht. Die uns vorliegende Originalerklärung kann den zuständigen Behörden auf Verlangen zur Verfügung gestellt werden.

Unsere Bestätigung setzt voraus, dass der Packstoff sachgemäß weiterverarbeitet wird. Die spezielle Eignung dieses Packstoffes kann nur vom sachkundigen Füllguterzeuger oder Abpacker beurteilt werden.

Diese Konformitätserklärung ersetzt zuvor ausgestellte Konformitätserklärungen und besitzt eine allgemeine Gültigkeit ab Ausstellungsdatum bis zum 03.01.2028 bzw. bis zur Änderung der Gesetzeslage.

Göttingen, den 03.01.2025

Nette GmbH
Göttingen
M. Nette

Lebensmittelunbedenklichkeitserklärung des Lieferanten:

ANFANG LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN

DECLARATION OF COMPLIANCE FOR MATERIALS AND ARTICLES INTENDED TO COME INTO CONTACT WITH FOOD

1. PRODUCT MANUFACTURER

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2. PRODUCTS COVERED BY THIS DECLARATION

Structure: OPP; CPP ■■■■■■■■■■ ■■■■■■■■■■

Description:

Printed or unprinted OPP (transparent, matte) or CPP (transparent, matte) bags.
According to the customer requirements with or without coatings.

3. THIS DECLARATION IS ISSUED ON 3RD JANUARY 2025

- Version nr. 1 amended on 20th January 2026

4. REGULATORY COMPLIANCE

We declare and confirm that all types of films, produced by ■■■■■■■■■■ ■■■■■■■■■■ meet the requirements listed in regulations as follows:

4.1 Food contact regulation

EU regulation

- Regulation of the European Parliament and of the Council (EC) No.1935/2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EC and 89/109/EE with emphasis on Articles 3, 11(5), 15 and 17
- Commission Regulation (EC) No.10/2011 on plastic materials and articles intended to come into contact with food (including its amendments up to Commission Regulation (EU) No.321/2011, 1282/2011, 1183/2012, 202/2014, 2015/174, 2016/1416, 2017/752, 2018/79, 2018/213, 2018/831, 2019/37, 2019/1338, 2020/1245, 2023/1442, 2023/1627, 2024/3190, 2025/351)
- Commission Regulation (EC) No.2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food

Nette GmbH
Elliehäuser Weg 7-11, 37079 Göttingen
Telefon: +49 551 69 47-0
Telefax: +49 551 69 47-27
E-Mail: info@nette-deutschland.de

Niederlassung Leipzig
Oststraße 5, 06231 Bad Dürrenberg OT Nempitz
Telefon: +49 3462 542 65-0
Telefax: +49 3462 542 65-11
E-Mail: leipzig@nette-deutschland.de

Geschäftsführer: Dipl.-Kfm. Michael Nette
Steuer-Nr.: 20/210/22840
Amtsgericht Göttingen HRB 1028
USt-Id-Nr.: DE249606280
ZSVG-Nr.: DE 5544 530 633 838



- Commission Regulation (EC) No.1895/2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food (BADGE/NOGE/BFDGE)
- The above-mentioned products do not contain additives according to the definitions of the Regulation (EC) No.450/2009 (active and intelligent materials)
- Regulation (EU) 2025/40 of the European Parliament and the Council of 19 December 2024 on packaging and packaging waste, amending regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive (EU)94/62/EC - CHAPTER II, Article 5, point 4 - sum of concentration of heavy metal in packaging, and Article 5, point 5 – requirements for PFAS substances in packaging.

Slovak regulations

- Decree of the Ministry of Agriculture and the Ministry of Health of the Slovak Republic of 9th June 2003 No. 1799/2003-100, which issues the fifth chapter of the second part of the Food Code of the Slovak Republic regulating materials and articles intended for contact with food, as amended
- Decree of the Ministry of Agriculture and the Ministry of Health of the Slovak Republic of 6th February 2006 No. 06267/2006-SL, which issues the title of the Food Code of the Slovak Republic regulating microbiological requirements for food and packaging

Switzerland regulation

- Swiss Ordinance on materials and articles in contact with food (817.023.21)

US Food and Drug Administration (FDA)

- US Food, Drug and Cosmetic regulation of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under 21 CFR - 177.1520 (polymers),

German regulation

- German Bundesinstitut für Risikobewertung (BfR VII Polypropylene) Recommendations

French regulation

- French Law 2012-1442 (Bisphenol A)

China

- This product complies with relevant requirements of GB4806.1-2016 - Food Contact Material & Articles General Safety Requirement
- The manufacturing process of this product complies with the relevant requirements of GB31603-2015: General Hygiene Standard for Production of Food Contact Materials and Articles
- The additives used in this product comply with the requirement of GB9685-2016 - National Food Safety Standard: Additives for use in Food Contact Materials and Articles

Japan

- According to the information received from our raw material suppliers our films are listed in the Positive List of Base Polymers. Food Contact Positive Lists by Japan's Ministry of Health, Labour and Welfare (MHLW) issued on April 28th, 2020 and effective on June 1st, 2020

4.2 California

- California Safe Drinking Water and Toxic Enforcement Act of 1986 Based on certification from our resins, films and additives suppliers, we certify that films do not contain any cancer causing or reproductive toxicity chemicals. We certify that during the production or converting of our films, we do not use or intentionally add into them any of the substances as restricted on the California Proposition 65 List of Chemicals and its subsequent amendments up to 3rd January 2025 pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986 (also known as California Proposition 65)

4.3 EuPIA

- EuPIA "Guideline on Printing Inks applied to the Food Contact Materials" - April 2020, 1st amendment May 2023
- EuPIA "Exclusion Policy for Printing Inks and Related Products" – 8th Edition, April 2025
- EuPIA " Good manufacturing Practice Printing Inks for Food Contact Materials"

4.4 Allergen statement

- The substances listed in the Annex II of the Regulation (EU) No.1169/2011 are not intentionally used in the manufacture or formulation of [REDACTED] [REDACTED] films.

4.5 REACH REGULATION (EC) No.1907/2006

- [REDACTED] is a downstream user according to Article 3 (13) the REACH regulation and therefore not obliged to register its products
- On the basis of the declarations received from our raw materials suppliers we can confirm, that our delivered packaging films supplies to you do not contain any SVHCs (Substances of Very High Concern) as published in Annex XIV and/or on the Candidate List. [REDACTED] [REDACTED] will continue to assess and monitor substances in the articles in order to assure compliance with REACH. Should any of the substances contained within the listed articles be included in the future in Annex XIV (or on the Candidate List) and be found in a concentration higher than 0.1% w/w (weight to weight), [REDACTED] [REDACTED] in accordance with Article 33, forward information about these substances with immediate effect

5. MIGRATION LIMITS

All plastics which are used for the production of [REDACTED] [REDACTED] films have been certified by our suppliers as complying with the legislation and recommendation of the European Union.

a) List of additives/monomers having a restriction (in current Regulations as amended by date)

Name of Substances	FCM	Ref.N./ CAS N./ or EC N.	Restriction (e.g.SML*, QM* specifications)
aluminium	--	--	SML= 1 mg/kg
zinc	--	--	SML= 5 mg/kg
acids, aliphatic, monocarboxylic (C 6-C 22), esters with polyglycerol	11	30960 ---	without SML value
N,N-Bis(2-hydroxyethyl) alkyl (C8 -C18) amine	19	39090	SML(T)= 1,2 mg/kg (expressed as tertiary amine)
N,N-bis(2- hydroxyethyl) alkyl(C8- C18)amine hydrochlorides	20	39120	SML(T)= 1.2 mg/kg (expressed as tertiary amine excluding HCl)

formaldehyde	98	17260, 54880 0000050-00-0	SML(T)= 15 mg/kg (expressed as formaldehyde)
palmitic acid	105	22780, 70400 0000057-10-3	without SML value
stearic acid	106	24550, 89040 0000057-11-4	without SML value
propylene oxide	135	24010 0000075-56-9	SML = ND (1 mg/kg in final product)
1,1,1-trimethylolpropane	141	13380, 25600, 94960 0000077-99-6	SML= 6 mg/kg
methacrylic acid, methyl ester	156	21130 00000080-62-6	SML(T)= 6 mg/kg (expressed as methacrylic acid)
phthalic acid, dibutyl ester	157	74880 00000084-74-2	SML= 0.12 mg/kg
methacrylic acid, diester with ethylene glycol	185	20440 0000097-90-5	SML= 0.05 mg/kg
diphenylmethane-4,4-diisocyanate	198	16630 0000101-68-8	SML(T)= ND or 1mg NCO/kg in final product (expressed as isocyanate moiety)
maleic anhydride	234	19960 0000108-31-6	SML(T)= 30 mg/kg (expressed as maleic acid)
diethyleneglycol	263	13326, 15760, 47680 0000111-46-6	SML(T)= 30.0 mg/kg (expressed as ethyleneglycol)
erucamide	271	52720 0000112-84-5	without SML value
phthalic acid, bis(2-ethylhexyl) ester	283	74640 0000117-81-7	SML = 0.6 mg/kg
triisopropanolamine	292	94560 0000122-20-3	SML = 5 mg/kg
1-hexene	356	18820 0000592-41-6	SML= 3 mg/kg
octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate	433	68320 0002081-79-3	SML= 6 mg/kg
n-octylphosphonic acid	483	68860 0004274-48-5	SML= 0.05 mg/kg
pentaerythritol tetrakis[3-(3,5-di-tert-butyl-4-hydroxyphenyl)-propionate]	496	71680 0006683-19-8	without SML value

2,5-bis(8tert-butyl-2-benzoxazolyl) thiophane	500	38560 0007128-64-5	SML= 0.6 mg/kg
octadecylceramide	587	68400 0010094-45-80	SML= 5 mg/kg
aluminium magnesium carbonate hydroxide	592	34690 0011097-59-9	without SML value
bis(2,4-di-tert-butylphenyl) pentaerythritol diphosphite	652	38820 0026741-53-7	SML= 0.6 mg/kg
1,3,5-tris(3,5-di-tert-butyl-4-hydroxybenzyl) -1,3,5-triazine -2,4,6(1H,3H,5H)-trione	661	95360 0027676-62-6	SML= 5 mg/kg
phosphorous acid, tris(2,4-di-tert-butylphenyl)ester	671	74240 0031570-04-4	without SML value
1,3,5-tris(4-tert-butyl-3-hydroxy-2,6-dimethylbenzyl) -1,3,5-triazine-2,4,6(1H,3H,5H)-trione	689	95280 0040601-76-1	SML= 6 mg/kg
craft reaction product of phosphorous trichloride and biphenyl	760	83595 0119345-01-6	SML= 18 mg/kg
3,3-bis(methoxymethyl)-2,5-dimethylhexane	763	39925 00129228-21-3	SML= 0.05 mg/kg
bis (2,4-dicumylphenyl) pentaerythritol -diphosphite	773	38840 0154862-43-8	SML= 5 mg/kg
9,9-bis(methoxymethyl) fluorene	779	39815 0182121-12-6	SML= 0.05 mg/kg
glycerides, castor-oil mono-hydrogenated, acetates	783	55910 0736150-63-3	SML(T) = 60 mg/kg (expressed as the sum of the substances)
acids, fatty (C8-C22) from animal or vegetable fats and oils, esters with alcohols, linear, aliphatic, monohydric, saturated, primary (C1-C22)	879	31336 ---	without SML value

b) Dual-use additives

With reference to article 11(3) of Regulation 10/2011 as amended, the presence of the dual use additives was determined on the basis of the food declaration of suppliers of raw materials.

The additives listed below are authorized as food additives by Regulation (EC) 1333/2008 as amended.

E Number/FL Number	FCM	Name of Additive
E 170	21	Calcium carbonate
E 304	---	Fatty acid esters of ascorbic acid

E 330	139	Citric acid
E 321	315	2,6-Di-tert-butyl-p-cresol(=BHT)
E 422	41	Glycerol
E 435	571	Polyoxyethylene sorbitan monostearate
E 470a	---	Sodium, potassium and calcium salts of fatty acids
E 470b	---	Magnesium salts of fatty acids
E 471	41	Mono and diglycerides of fatty acids
E 475	11	Polyglycerol esters of fatty acids
E 551	504	Silicon dioxide
E 900	71	Polydimethylsiloxane
E 1520	109	1,2-dipropanediol

Their migration is lower than the overall migration reported at point 6a) -Overall migration.

6. SUBSTANCES IN ACCORDANCE WITH VALID DIRECTIVES

Based on the documentation we received from our raw materials suppliers and analytic test conducted with European guidelines 10/2011 the amount of the substances is lower than the specific migration limit.

The conditions of model migration tests and the selection of foodstuff simulators comply with the requirements of Regulation (EU) No.10/2011 (inclusive of all amendments and supplements) relating to plastic materials and articles intended to come into contact with foodstuffs. The area limit value of 10mg/dm² is maintained under the following test conditions.

Data stated on the DoC are in accordance with the results stated on the test reports from the accredited laboratories of [REDACTED] and [REDACTED].

a) Overall migration

Testing Conditions			
Testing food simulants	Time	Temperature	Results (mg/dm ²)
A: 10% ethanol	10 days	40+/-1°C	< 1.5

B: 3% acetic acid	10 days	40+/-1°C	< 1.5
C: 20% ethanol	10 days	40+/-1°C	< 1.5
D1: 50% ethanol	10 days	40+/-1°C	< 1.5
95% ethanol	10 days	40+/-1°C	< 1.5
Isooctane	48 hours	20+/-1°C	< 1.5
D2: olive oil	10 days	40+/-2°C	< 2.0
MPPO	10 days	40+/-2°C	< 2.0

Test report No.: 925-936, 938/2024- [REDACTED] (03/2024)

Test report No.: 472117414-01 - [REDACTED] (03/2024)

b) Specific migration

The required SML- and/or QM or QMA - limits according to EU Regulation No.10/2011 (inclusive of all amendments and supplements) are met.

Condition: Time 10 days / Temperature 60+/-2°C

Specific migration	FCM	CAS No	Simulant used	Results ¹ (mg/kg)
Al	---	---	B: 3% acetic acid	<0.007
Al	---	---	deionized water	≤0.002
BADGE	---	---	95% ethanol	≤0.001
BFDGE	---	---	95% ethanol	≤0.002
NOGE	---	---	95% ethanol	≤0.009
DEP phthalic acid, diethyl ester	---	---	95% ethanol	≤0.05
DCHP phthalic acid, dicyclohexyl ester	---	---	95% ethanol	≤0.05
DIBP phthalic acid, diisobutyl ester	---	---	95% ethanol	≤0.05
DIDP phthalic acid, diisodecyl ester	---	---	95% ethanol	≤0.6
DINP phthalic acid, diisononyl ester	---	---	95% ethanol	≤0.3
DMP-phthalic acid, dimethyl ester	---	---	95% ethanol	≤0.05
formaldehyde	98	0000050-0-0	3% acetic acid	<3.00

bisphenol A	151	0000080-05-7	95% ethanol	≤0.001
DBP phthalic acid, dibutyl ester	157	0000084-74-2	95% ethanol	≤0.05
BBP phthalic acid, dibutyl benzyl ester	159	0000085-44-9	95% ethanol	≤0.05
ethyleneglycol	227	0000107-21-1	95% ethanol	≤1.0
dietylglycol	263	0000111-46-6	95% ethanol	≤1.0
1-octene	264	000111-66-0	95% ethanol	≤0.8
DEHP-phthalic acid	283	0000117-81-7	95% ethanol	≤0.05
isophthalic acid	291	0000121-91-5	3% acetic acid	≤0.04
2,6-di-tert-butyl-p-cresol	315	0000128-37-0	95% ethanol	≤0.08
DAP-phthalic acid	316	0000131-17-9	95% ethanol	≤0.05
1-hexene	356	0000592-41-6	95% ethanol	≤0.2
octadecyl 3-(3,5-di-tert-butyl-4hydroxyphenyl) propionate	433	0002082-79-3	95% ethanol	≤0.2
2,5-bis(5-tert-butyl-2-benzoxazolyl)thiophene	500	0007128-64-5	95% ethanol	≤0.009
terephthalic acid	785	0000100-21-0	3% acetic acid	≤0.04

Test report No.: 925-936, 938, 6370/2024- [REDACTED] (03/2024)

¹Symbol „≤“ means less than limit of detection of the analytical method

Symbol „<“ means less than limit of quantification of the analytical method

In accordance with Regulation (EU) 2020/1245, the content of the above substances was determined by analytical evaluation. The documentation of the input raw materials from our suppliers and based on our technological procedures show that no salts / acids / bases of other metals from the said Regulation were used in the production process.

c) Sensorial assessment

Data stated on the DoC are in accordance with the results stated on the test reports from the accredited laboratories of [REDACTED].

Test conditions: 10 days at 60°C

Model substance:

- drinking water (simulating soft drinks, non-acid foodstuffs, dairy products, fresh meat)
- powdered sugar (simulating dry foodstuffs of constant consistence)
- milk chocolate (simulating foodstuffs with higher contents of fat and water)

The overall average value change of taste, odour and appearance did not exceed value 1.8 for all types of model substances. There is low probability that packaging films will have negative impact on the organoleptic/sensory

properties of food and drinking water.

d) Microbiological examination

Testing Conditions			
Parameter	Temperature	Unit	Number of units
Coliform bacteria	37°C	CFU/dm ²	0,0,0,0,0
Moulds (micromycetes)	25°C	CFU/dm ²	0,0,0,0,0
The other pathogenic and potentially pathogenic microorganisms	37°C	presence	negative

Test report No.: 925-936, 938/2024- [REDACTED] (03/2024)

e) Heavy metals

According with Regulation (EU) 2025/40 of the European Parliament and the Council of 19 December 2024 on packaging and packaging waste, amending regulation (Eu) 2019/1020 and Directive (EU) 2019/904, and repealing Directive (EU)94/62/EC - is proven compliance with CHAPTER II, Article 5, point 4 when sum of concentration of heavy metal in packaging - Lead (Pb), Cadmium(Cd), Mercury(Cu), Chrome Hexavalent(Cr⁶⁺) are not exceed limit 100 mg/kg (100 ppm).

Metal content in product / test performed in an accredited laboratory		
Metal	Test result ¹	Unit
Cadmium	≤0.007	mg/kg
Lead	0.176	mg/kg
Mercury	≤0.3	mg/kg
Chromium6+	0.890	mg/kg

Test report No.: 937/2024 - [REDACTED] (03/2024)

¹Symbol „≤“ means less than limit of detection of the analytical method

Symbol „<“ means less than limit of quantification of the analytical method

f) NIAS

NIAS are substances, which are accidentally introduced into materials intended to be used with food contact during manufacture and marketing, such as impurities in the substances used, reaction intermediates that have formed in the manufacturing process or degradation or reaction products.

This product has been tested for NIAS. The NIAS identified in this product have been tested by accredited laboratories of [REDACTED] in accordance with Article 19 of the Plastics Regulation (10/2011) and meet the relevant requirements of the Framework Regulation (1935/2004).

Name of Substances	Ref. N. and/or CAS N.
2,4-di-tert-butylphenol	0000096-76-4
2,4-toluene diisocyanate	0000584-84-9
3,5-di-tert-butyl 4-hydroxybenzaldehyde	0001620-98-0
7,9-di-tert-butyl-1-oxaspirom (4,5) deca-6,9 diene-2,8-dione	0082304-66-3
Dipropylenglycol monomethylether	0034590-94-8

Test report No.: 472117415-01 [REDACTED] (03/2024)

g) Mineral oils

Mineral oil (MOSH/POSH and MOAH) was analysed using an internal test method and LC/GC-FID analysis technique by External accredited laboratory [REDACTED] (Finland).

Preparation of the simulant: EN 1186-13

Test conditions: 10 days at 20 °C

Food simulant: Tenax

Test report No.: ID 6351-12, v.3 (2023)

MOSH/POSH ¹ group	Unit ²	Result
MOSH/POSH (C10-C50) total ³	mg/kg	Not detected ⁴

MOAH ¹ group	Unit ²	Result
MOAH (C10-C50) total ³	mg/kg	Not detected ⁴

Test conditions: 10 days at 60 °C

Food simulant: Tenax

Test report No.: ID 6351-12, v.3 (2023)

MOSH/POSH ¹ group	Unit ²	Result
MOSH/POSH (C10-C16)	mg/kg	<0.30
MOSH/POSH (C16-C20)	mg/kg	<0.30
MOSH/POSH (C20-C25)	mg/kg	<0.30

MOSH/POSH (C25-C35)	mg/kg	<0.30
MOSH/POSH (C35-C40)	mg/kg	Not detected
MOSH/POSH (C40-C50)	mg/kg	Not detected
MOSH/POSH (C16-C50)	mg/kg	<0.90
MOSH/POSH (C10-C50) total³	mg/kg	<1.2⁴

MOAH ¹ group	Unit ²	Result
MOAH (C10-C50) total ³	mg/kg	Not detected ⁴

¹MOAH are divided into groups based on the number of carbons in them.

²Migration as mg/kg of food simulant applying the surface to volume ratio of 6 dm²/1 kg of food.

³Total migration of MOAH compounds with 10 - 50 carbons.

⁴Limit of detection (LOD) 0.060 mg/kg food simulant.

7. INTENDED FOOD CONTACT

a) the type of food or process for which the material is intended:

- 02 - cereals, cereal products, pastry, biscuits, cakes and other bakers' wares
- 02.04 - dry pasta e.g. macaroni, spaghetti and similar products and fresh pasta
- 02.05 - pastry, biscuits, cakes, bread, and other bakers' wares, dry (A, B)
- 03 - chocolate, sugar and products thereof confectionery products
- 03.01 - confectionery products substitutes and products coated with substitutes
- 03.02 - confectionery products (A)
- 03.03 - sugar and sugar products
- 04.02 - processed fruit (A)
- 08.02 - fried or roasted foods (A)
- 08.13 - aromatic herbs and other herbs such as camomile, mallow, mint, tea, lime blossom and others

b) time and temperature of treatment and storage in contact with the food.

The food safety of product was verified under the test conditions of 10 days / 40°C for OML and 10 days / 60°C for SML. Under these conditions, no exceedances occurred allowed migration limits. The test covers storage times at room temperature, in the refrigerated and frozen state of the food.

The storage time should be determined by the nature of the packaged food products.

c) ratio of the area of the food contact material to the volume used to determine the compliance of the plastic food contact material or article: 6 dm²/kg

d) Labelling: the product is intended to come into contact with food



8. THE MENTIONED PRODUCT DOES NOT CONTAIN ANY FUNCTIONAL PLASTIC BARRIER

9. This group of plastic materials [REDACTED]; [REDACTED] are not intended for reprocessing and have been manufactured only from raw materials

10. RESPONSIBILITIES

This declaration is valid for the product as described and delivered by us.

By following the above-mentioned regulations, we have fulfilled our duty of care regarding the conformance of the film we supply with legislation governing food contact applications. It is the responsibility of the user to test the suitability of our products for the intended applications. We accept no liability for losses arising from inadequate suitability of our products for the food medium being used by you.

The content of this declaration is strictly confidential and should not be passed on to third parties. However, in case your customer requires this information in order to assess compliance and measuring migration as required by law, you are entitled to pass them on to the customer or a neutral institute, under the strict obligation that the information is treated strictly confidential. In each case all amendments of the above-mentioned regulations or recommendations are included in their relevant versions up to the time of the issue of this statement.

This declaration will be valid for three years starting from the date of issue and it will be replaced only in case of major changes in the production of the material which might invalidate this document, in case the legislation references are modified or updated and when new products will be introduced in [REDACTED] [REDACTED] range.

This document is valid for 3 years from the date of issue.

This document was issued electronically and is therefore valid without signature.

[REDACTED]
Food Safety Specialist

ENDE LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN

Nette GmbH
Elliehäuser Weg 7-11, 37079 Göttingen
Telefon: +49 551 69 47-0
Telefax: +49 551 69 47-27
E-Mail: info@nette-deutschland.de

Niederlassung Leipzig
Oststraße 5, 06231 Bad Dürrenberg OT Nempitz
Telefon: +49 3462 542 65-0
Telefax: +49 3462 542 65-11
E-Mail: leipzig@nette-deutschland.de

Geschäftsführer: Dipl.-Kfm. Michael Nette
Steuer-Nr.: 20/210/22840
Amtsgericht Göttingen HRB 1028
USt-Id-Nr.: DE 249 606 280
ZSVG-Nr.: DE 5544 530 633 838

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