

**PRODUCT SAFETY STATEMENT****Material description**

The paper mill which produces this paper is a manufacturer of baking papers and cooking papers. SAGA, the baking and cooking brand, comprises a wide offering of baking and cooking papers for both professional and household use. All the baking and cooking papers are made from fresh fibres, which can be traced back to their source in sustainably managed northern forests. The production units manufacture baking and cooking papers in compliance with good manufacturing practice and quality management system certified according to ISO 9001, ISO 14001 and ISO 22000 or BRC.

**Product composition:** Natural cellulose pulp 91 - 94,5%, Release coating, elastomer based on aqueous emulsion of polydimethylsiloxane (1 - 4%), Wet strength agent (max 1%), Moisture (5%)

**BAKE AND COOK FAMILY - GRADES**

<b>Processbake / Softbake</b>	Limited release for machine use at industrial food processors, e.g. for pizza doughs, cheese, meat, patties.
<b>Onebake / Softbake</b>	Good release for household baking.
<b>Multibake / Plusbake</b>	Excellent release for most of baking goods for professional use.
<b>Oneside Bake</b>	Good release towards most types of baking goods. Designed for laminating and converting into grilling bags The only quality, which is one-side siliconized
<b>Premiumbake / Highbake</b>	Premium release for all baking goods including salt pretzels, crisp bread and extremely sticky products. Suitable for use in contact grills.
<b>SAGA Premium ed</b>	Extra dense cooking grade for many food preparation processes in households, restaurants, industrial kitchens; for steam cooking, frying, freezing. Suitable for use in contact grills.
<b>SAGA Premium ws</b>	Wet strong cooking grade for many food preparation processes in households, restaurants, industrial kitchens; for steam cooking, frying, freezing. Suitable for use in contact grills. Supporting the professional cook & chill process.

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**MANAGEMENT SYSTEMS AND CERTIFICATES**

	Description	Mill A	Mill B	Bausch
<b>Production sites fulfil criteria of:</b>				
ISO 9001	Quality	X	X	X
ISO 14001	Environment	X	X	
ISO 50001	Energy	X	X	
ISO 45001	Occupational safety	X	X	
BRC-CP	Food safety and hygiene	X	X	
IFS-HPC	Food safety and hygiene	X	-	
ISO 22000	Food safety and hygiene	-	X	
PEFC/FSC (COC standards).	Forest management	X	X	X
SEDEX	Ethical supplier	X	X	
<b>Products fulfil criteria of</b>				
Kosher (with passover)		X	X	n.a. <sup>1</sup>
Halal		X	X	n.a. <sup>1</sup>
Nordic Swan	Ecolabel	X	X	n.a. <sup>1</sup>
OK Compost Home	Compostability	X	X	n.a. <sup>1</sup>
OK Compost Industrial	Compostability	X	X	n.a. <sup>1</sup>

<sup>1</sup>: As this property was certified for the production process of the paper mills, it is also transferable to Bausch.

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## FOOD CONTACT

### Declaration of Compliance

We hereby state that this product is in compliance with the following global food contact laws and recommendations. The product has been tested by an independent laboratory for suitability for food contact and compliance with the regulations and recommendations listed below. Additionally, the compliance evaluations are based on the declarations of compliance provided by our raw material suppliers and complementary information obtained on a confidential basis.

The trade name(s) mentioned above are suitable for food contact as described below.

<b>EU and EEA:</b> <b>Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food</b> <b>Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food</b>	Complies when applicable and under foreseeable conditions of use  Complies when applicable and under foreseeable conditions of use
<b>Germany:</b>  <b>Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs, and Animal Feed Code – LFGB), §§ 30 and 31</b>  <b>BfR (Bundesinstitut für Risikobewertung) XXXVI. Paper and Board for food contact</b>  <b>BfR XXXVI/2. Paper and Board for Baking Purposes</b>	Complies when applicable and under foreseeable conditions of use.  For use in direct contact with all food types (dry, moist, fatty and non-fatty).  For use at temperatures up to 220°C. May stand in direct contact with all food types (dry, moist, fatty and non-fatty).
<b>Italy:</b> <b>Decreto Ministeriale 21 marzo 1973 and amendments;</b> <b>- D.P.R. 777/82 and amendments;</b> <b>- D.Lgs. n°29/2017</b>	All food types
<b>France:</b> <b>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</b>	All food types
<b>Switzerland<sup>1</sup>:</b>  <b>SR 817.0 Bundesgesetz über Lebensmittel und Gebrauchsgegenstände, Artikel 15</b> <b>SR 817.02 Lebensmittel- und Gebrauchsgegenständeverordnung, Artikel 49</b>	Complies when applicable and under foreseeable conditions of use  <sup>1</sup> The products do not comply with SR 817.023.21 (Verordnung des EDI über Materialien und Gegenstände, die dazu bestimmt sind, mit Lebensmitteln in Berührung zu kommen (Bedarfsgegenständeverordnung)), because glutaraldehyde is used in very small amount (0,0009% calculated as w/w in finished paper product) as preservative in a silicone component. Glutaraldehyde is not present in finished products, because it degrades in paper manufacturing process.
<b>USA:</b>  <b>The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations,</b>	All food types, excluding infant formula and breast milk, under FDA's Conditions of Use A

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including: 21 C.F.R. §§ 176.170 (“Components of paper and paperboard in contact with aqueous and fatty foods”) and 176.180 (“Components of paper and paperboard in contact with dry food”)	(“High temperature heat-sterilized (e.g., over 212 °F)”) through H (“Frozen or refrigerated: Ready-prepared foods intended to be reheated in container at time of use”), as well as J (“Cooking at temperatures exceeding 250°F”)
<b>China:</b> <b>GB 9685-2016 Hygienic Standards for Uses of Additives in Food Containers and Packaging Materials</b>  <b>GB 4806.8-2022 Food-Contact Use Paper and Paperboard Materials and Articles</b>  <b>GB 4806.1-2016 General Safety Requirements for Food-Contact Materials and Articles</b>	All additives used in the manufacture of the product are listed in GB9685-2016 or subsequent MOH Announcements for the appropriate use  Complies when applicable and under foreseeable conditions of use  Complies when applicable and under foreseeable conditions of use
<b>Mercosur:</b>  <b>GMC No. 40/15 Technical Regulation on cellulosic materials, packaging and equipment intended to come into contact with food</b>  <b>GMC No. 42/15 Technical Regulation on cellulosic materials, packaging and equipment intended to come into contact with food during cooking or heating in oven</b>	Complies when applicable and under foreseeable conditions of use.  Complies when applicable and under foreseeable conditions of use.

## DUAL USE SUBSTANCES

Substance	E code	CAS no.	Concentration in product
Sorbic acid	E200	110-44-1	<0,01%
Sorbitan monostearate	E491	1338-41-6	0,00%
Polyethylene glycol sorbitan monostearate	E433	9005-65-6	0,00%
Xanthan gum	E415	11138-66-2	0,00%
Colloidal silica	E551	7631-86-9	<0,05%
Ammonium sulfate	E517	7783-20-2	<0,04%
Adipic acid	E355	124-04-9	0,00%

## INDUSTRY GUIDELINES AND POLICIES

The bake and cook family grades comply with the Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles, March 2019. The Guidelines is supported by the European paper and board supply chain: CEPI (paper and board manufacturers); CITPA (paper and board converters); ECMA (carton makers association); ACE (beverage carton alliance); CCB (CEPI Containerboard); FEFCO (corrugated packaging) and ETS (tissue paper association).

The paper mills also comply with CIPI Good Manufacturing Practice Guideline for the manufacture of paper and board for food contact. 2 Ed. May 2023

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## TYPICAL APPLICATIONS

Baking and Cooking paper is intended to be used for applications in conventional ovens, microwave ovens and frying pans (one time use). Additionally the paper is suitable for food preservation in room temperature, and in refrigerators and freezers.

Appliance	Temperature range	Experienced usage time
Freezer	-30...0 °C (-22 ...32°F)	12 months
Refridgerator	+4 ...+7 °C (39...44°F)	2 months
Room	+15 ...+30 °C (59...86°F)	According to food type; Dry foods up to 12 months
<b>Conventional oven</b>		If at least 80 % of paper is covered by food, then:
	+220 °C (428 °F)	> 30 min
	+200 °C (392 °F)	>60 min
	+180 °C (356 °F)	> 120 min
	+150 °C (302 °F)	> 4 hours
	+60...+100 °C (140...212 °F)	> 12 hours
	< +60 °C (< 140 °F)	> 24 hours
Air fryer	max +220 °C (428 °F)	max 60 min
Microwave oven	max +150 °C (302 °F)	30 min
Frying pan	up to +300 °C* (572 °F)	10 min provided that at least 80 % of paper is covered by food.
Contact grill		
Merrychef®		
Turbochef®		

\*see also Chapter 'Heat resistance and ignition -risk assessment'

## STORAGE RECOMMENDATIONS

All baking papers should be generally stored in their original packaging under following conditions:

- Protected against wind, rain, frost and direct sunlight.
- Dry and free from any humidity.
- Storage temperature between min 0°C and max 40°C (min 32 F and max 104 F).
- Protected against any kind of pollution or damages
- Storage time: 3 years

For base paper reels use a maximum clamp pressure of 130 bar in order to avoid any damages or deviations

## REUSABILITY

Baking and Cooking papers are basically designed for a one-time use, so it is within our responsibility to ensure this. Nevertheless it can be generally used several times depending on a variety of parameters, like e.g. baking temperature, baking time, humidity of baking food, coverage area.

As a producer, we are not able to influence the further handling of the paper. Fat, food remains and other soiling have a considerable influence on the re-usability (on the heat resistance as well as the release functionality). As we have no knowledge of these factors and cannot influence them, the re-usability of the papers is under the customers' responsibility.

Particularly with regard to hygienic aspects we generally advise not to re-use the paper. HACCP-certified enterprises, which are producing according to a defined hygienic standard, are principally just using baking paper once. Herewith they avoid for example cross-contamination and offer a maximum of product safety.

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## HEAT RESISTANCE AND IGNITION

For best product safety, the European laws are following the German recommendation BFR XXXVI/2. It prescribes a temperature of 220°C (428°F). To comply with valid food regulations maximum temperature of 220°C is printed on cases in most countries, where it is not legal to market baking papers with higher temperatures. It is possible for manufacturers to demonstrate suitability for use in food contact at temperatures up to 250°C (482°F) in Nordic countries, Denmark, Finland, Norway and Sweden, by conducting a risk assessment.

For the risk assessment, we identified two types of risks:

- A) a risk of fire or physical degradation and
- B) a risk of being non-inert in contact with food simulants. The assessment is carried out by conducting relevant tests with representative samples.

### Testing of physical heat resistance and ignition of the baking paper

Heat resistance of paper was measured with and without baking goods. As a result we got the confirmation that our baking and cooking papers can stand baking processes up to 300°C (572°F) for 10 minutes under following condition: baking paper must be covered at least with 80% baking goods. Uncovered (plain) paper on tin tends to get brown under high temperatures. It is getting brittle as well but it does not start burning.

The paper mill has also initiated two studies at VTT, Finland (2006 and 2015) about ignition of baking papers. According to this study the paper starts getting brown and brittle very rapidly at a temperature around 250- 280°C (482-536°F). However, the actual ignition point, at which the paper catches fire is above 440°C (824°F). The difference between the recommended maximum temperature of 220°C (428°F) and the actual ignition point of >440°C (824°F) is therefore ≈220 °C (396°F), which to our understanding allows a sufficient safety margin, and it is therefore safe to use baking paper in the temperatures up to 250°C (482°F). Burning paper in household or professional ovens is based on faulty application from user`s side (dirty oven, contact with heating elements). Therefore any contact of the paper with the heating elements and side walls shall be avoided. And care about a clean device (free from greasy residues).

### Migration testing of the baking paper at high temperatures

In order to assess the risk of migration of harmful substances from paper to food, several migration studies have been made from our product in an independent laboratory, including:

Type	Food simulant	Temperature	Time	Result
Overall	10 % ethanol	at reflux	4 h	< 7 mg/dm <sup>2</sup> ; < 0.5 mg/in <sup>2</sup>
Overall	3% acetic acid	100 °C 212 °F	4 h	< 7 mg/dm <sup>2</sup> ; < 0.5 mg/in <sup>2</sup>
Overall	olive oil	225 °C 437 °F	2h	< 7 mg/dm <sup>2</sup> ; < 0.5 mg/in <sup>2</sup>
Overall	MPPO (tenax)	250 °C 482 °F	30 min	< 7 mg/dm <sup>2</sup> ; < 0.5 mg/in <sup>2</sup>

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Specific (BPA)	10 % ethanol	at reflux	8 h	not detectable
	3% acetic acid	100 °C/212°F	8 h	not detectable
	olive oil	175 °C/347°F	2 h	not detectable
Specific (PAA)	3% acetic acid	100 °C/212°F	8 h	not detectable
Specific (Hg, Pb)	3% acetic acid	100 °C/212°F	8 h	Lead: < 0,01 mg/kg
				Mercury: not detectable

No migration above the safety limits were observed. Fluorinated substances, such as perfluorinated alkyl substances (PFAS), optical brighteners and recycled paper are not used as raw materials. Therefore we can conclude that it is safe to use the baking papier in temperatures up to 250°C (482°F).

## BARRIER PROPERTIES

The products are highly refined papers with good/ excellent/ premium greaseproofness (depending on grade) according to DIN 53116.

The paper has in general a low air permeability.

## Mineral Oil

This product is manufactured from fresh fibres and does not contain any printed recycled material. Mineral oils are not used as raw materials in the manufacturing of this product. All used production chemicals and additives are approved for food contact.

## NANOMATERIALS

We hereby warrant that this product is not defined as a nanomaterial according to the Commission Recommendation on the definition as nanomaterial 2011/696/EU as amended. However, some of the additives that have commonly been used in pulp and paper production processes for centuries contain nanoscale particles. These particles are not classified as dangerous and do not pose a risk to human health.

## NON-USE WARRANTY

The paper mill hereby warrant that the paper does not use the substances listed below in its production processes. Based on testing and/or information received from raw material suppliers this product is free from substances listed below or, where these substances exist as traces in the raw materials or are generated during the manufacturing process, their content is below the limits specified in applicable legislation or agreement, and never exceeding the threshold limit of 0,1% by weight of the product.

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<b>Recycled material</b>	<b>The product(s) is manufactured from virgin materials and does not contain any recycled materials.</b>
<b>Chlorine</b>	Pulps used in production of the product come from ECF (elementary chlorine free) and/or TCF (total chlorine free) processes.
<b>Fluorine</b>	Fluorinated chemicals, per- and polyfluoroalkyl substances (PFAS), including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid and its derivatives (PFOS), are not used in the manufacturing of the product. According to third-party accredited laboratory testing, PFAS compounds were not detected in the products (detection limit 1.0 µg/kg).
<b>Heavy metals</b>	No heavy metals are intentionally added during the manufacturing process.  Any traces of lead, mercury, cadmium and chromium (VI) present in the product do not exceed 100 ppm in total by weight as regulated in <ul style="list-style-type: none"> <li>• Directive 94/62/EC on Packaging and Packaging Waste and its amendments</li> <li>• TPCH (CONEG): The Model Toxics in Packaging Legislation</li> </ul>
<b>Genetically modified organisms (GMO)</b>	No GMO based raw materials are used in the production process. GMO as defined by EU Directive 2001/18/EC means an organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination
<b>Animal origin</b>	No raw materials of animal origin are used in the manufacturing of the product.
<b>Conflict minerals</b>	Chemicals containing gold (Au), tantalum (Ta), tin (Sn) and wolfram (W) also known as tungsten, are not used in the manufacture of the product.  We also hereby declare that raw materials originating from the Democratic Republic of Congo are not used as raw materials and the product fulfils the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
<b>Epoxy derivatives</b>	2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether ('BADGE' i.e. Bisphenol-A DiGlycidyl Ether), bis(hydroxyphenyl) methane bis(2,3-epoxypropyl) ethers ('BFDGE' i.e. Bisphenol-F DiGlycidyl Ether) and novolac glycidyl ethers (NOGE) as listed in Regulation (EC) No. 1895/2005.
<b>California Proposition 65</b>	Substances listed in California Proposition 65 The Safe Drinking Water and Toxic Enforcement Act of 1986 are not used as raw materials. In case listed substances are present as traces, the exposure is estimated to be below relevant safe harbor levels. If no safe harbor level is given, an internal risk assessment has been performed to show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.
<b>POP Regulation and brominated flame retardants</b>	Substances listed in the Regulation (EC) No 2019/1021 on persistent organic pollutants "POPs" Annex I, including for example polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs).
<b>We do not use</b>	Anthraquinone Azocolourants and azodyes as defined in Annex XVII of REACH Benzophenone and hydroxybenzophenone Bisphenols Formaldehyde Gluten Isopropylthioxanthone (ITX) Melamine 4-methyl-benzophenone (4-mbp) Mono and diglycerides of fatty acids

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	Natural rubber latex materials Optical brighteners Phthalates Polycarbonate Polychlorinated biphenyls (PCBs) Styrene
<b>Allergens</b>	We hereby warrant that substances or products causing allergies or intolerances listed in Regulation (EU) No 1169/2011 Annex II and in the Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA, U.S.A.) are not used as raw materials in the manufacturing process of the product(s). This includes for example cereals, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, lupin and molluscs. The presence of sulphur dioxide and sulphites cannot be excluded, however, their concentration is expected to be much less than the EU limit of 10 mg/kg in the paper.

## CIRCULAR ECONOMY

The papers of the bake and cook family mentioned above are technically 100 % recyclable. All grades without wet strength achieved at least Level B recyclability (Aticelca evaluation method 501:2019) in the testing according to the standard UNI 11743:2019. Also, the broke of all grades without wet strength agent are re-used in our own paper-making process.

Product(s) are certified for use of the 'OK Compost Industrial' and 'OK Compost Home' conformity marks. This means that the products fulfill the requirements of EN 13432, and includes biodegradability (tested according to ISO 14855-1). Heavy metals and the fluorine content lay well below the maximum levels as prescribed by the standards EN 13432 (2000), NF T51-800 (2015), ASTM D6868 (2017) and CAN/BNQ 0017-088 (2010). Composting of the product result in compost that is safe for growing plants. Ecotoxicity was not found when investigated according to EN 13432.

The toxicity to earth worms was tested by independent laboratory according to the ASTM E 1676 method of the compost generated in the disintegration test. The results showed that when the product broke down in the compost, there were no residues or degradation products that would adversely affect the viability and average weight of earth worms.

The papers of the bake and cook family mentioned above can be recycled as paper according to the standards: material recycling EN 13430 and energy recovery EN 13431 (see more information below). Used or polluted papers can be disposed together with food waste in dedicated containers, which will be forwarded to composting or biogas plants. All our papers could be sent for thermal recovery as well.

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**PACKAGING AND PACKAGING WASTE****EU DIRECTIVE 94/62/EC**

We hereby warrant the product(s) is/are in compliance with the requirements of Directive 94/62/EC and its amendment 2004/12/EC. When used as packaging material this conformity is specified as following:

<b>EN 13427 Requirements for the use of European standards in the field of packaging and packaging waste</b>	The procedures and record keeping enabling this declaration are part of Metsä Greaseproof Papers' ISO 9001 and ISO 14001 management systems.
<b>ISO 18601 General requirements for the use of ISO standards in the field of packaging and the environment</b>	
<b>CR 13695-1 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment – Part 1: Requirements for measuring and verifying the four heavy metals present in packaging</b>	Concentrations of four named heavy metals are clearly below the regulated limits.
<b>CONEG Certification / The Model Toxics in Packaging Legislation (USA)</b>	
<b>CEN/TR 13695-2 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment. Part 2: Requirements for measuring and verifying dangerous substances present in packaging, and their release into the environment.</b>	Concentration of substances classified as hazardous is much less than 1 % of the product weight. Substances and mixtures classified as very* hazardous have not been used as raw materials in this product.  <i>*Very hazardous means the following classes of the Global Harmonized System (GHS): Carcinogenicity (Cat. 1A, 1B and 2), Acute toxicity (Cat 1 or 2), Mutagenicity (Cat 1A, 1B and 2), Reproductive toxicity (Cat 1A, 1B and 2), Hazardous to the aquatic environment (Acute 1 or Chronic 1) and Hazardous to ozone layer Cat. 1.</i>
<b>EN 13430 Requirements for packaging recoverable by material recycling</b>	If not used, this product is suitable for material recovery as it is compatible with the known, relevant and industrially available paper recycling technologies in the EU.
<b>EN 13431 Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value</b>	If not used, this product is suitable for energy recovery, as it is composed of much more than 50 % of organic content.
<b>ISO 18605 Energy recovery</b>	
<b>EN 13432 Requirements for packaging recoverable through composting and biodegradation. Test scheme and evaluation criteria for the final acceptance of packaging</b>	Product(s) are certified for use of the 'OK Compost Industrial' and 'OK Compost Home' conformity marks. See the Chapter 'Circular economy'.
<b>ISO 18606 Organic recycling</b>	

**REACH**

We hereby warrant that the requirements of REACH Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals are fulfilled and only chemicals complying with the provisions laid down in the regulation are used in the manufacture of the paper products of the bake and cook family. The papermills are downstream users of chemicals.

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The paper products comply with the relevant restrictions set forth in Annex XVII of REACH Regulation on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. Furthermore, substances subject to authorisation listed in Annex XIV are not used.

According to REACH Regulation chemical and article suppliers are required to inform downstream users regarding the presence of substances listed on the Candidate List of Substances of Very High Concern (SVHC) for Authorisation above the reporting limit. Based on information received from upstream suppliers the paper products do not contain Substances of Very High Concern above the reporting limit of 0,1%.

## DISCLAIMER

The information provided in this statement applies only for the greaseproof products as delivered and may not substitute necessary end use testing. Andreas Th. Bausch GmbH & Co.KG shall not be liable for any damage or injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of the product for a particular application or end use.

The information given in this statement has been verified by the producing paper mill at the date of its publication and it shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available.

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Winsen (Luhe), January, 2025

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