

This manufacturer's declaration applies to all production sites of Roland Mills United GmbH & Co KG. It is a constituent part of the product specification. By issuing this manufacturer's declaration we confirm:

1. Rules and Regulations

Legal Conformity:

Our products comply with the pertinent applicable German and EU food and feed regulations. Our production sites are registered in accordance with the Food Hygiene Regulation (EC) No. 852/2004 as well as in accordance with the Feed Hygiene Regulation (EC) No. 183/2005.

Traceability:

The installed tracing systems comply with the requirements of General Food Law Regulation (EC) No. 178/2002.

Genetically modified Organisms (GMO):

Our products are not subject to marking in accordance with Regulations (EC) No. 1829/2003 and 1830/2003, including plants modified by mutagenesis (CRISP CAS).

Allergens:

Our products are labelled with reference to allergens in accordance with the requirements of LMIV (EU) No. 1169/2011. The RMU allergen risk analysis is based on the reference doses of the EU-Vital 4.0 study. Cereals are a natural product. Possible cross-contaminations coming from the field and from the supply chain cannot be excluded despite good milling production practices and careful cleaning in the process (no zero tolerance). Irrespective of the specifics of the production and processing of the raw material grain, we have installed in the past as well as in the future a consistent minimization strategy according to the ALARA (As Low As Reasonably Achievable) principle with regard to botanical impurities with allergenic potential.

According to our assessment and a responsible evaluation for grain milling products, a voluntary supplementary labelling, especially for soy, is inevitable.

This assessment is also confirmed by the current evaluation of the European Grain and Flour Monitoring of the VGMS industry-wide.

Our RMU allergen monitoring is used as a basis for evaluation (4-yearly; with annual updates):

Allergen list 31.12.25	method	Number of all examinations	Ø- average	95 th percentile measurements
period: 01.01.2022–31.12.2025				
Mustard	PCR	205	0,12 mg/kg	1,0 mg/kg
soy	ELISA	468	0,92 mg/kg	3,0 mg/kg
lupines	ELISA	204	0,55 mg/kg	1,0 mg/kg

**Calculation method: Data is determined using the upper bound method. Results below the detection limit (DL) are taken into account with a factor of 0. Analysis values below the limit of quantification (LOQ) are included in the calculation with the full value of the respective laboratory-specific limit of quantification.*

In addition to processing wheat, rye, triticale, spelt and durum, we also grind field beans at our Roland Mills Nord site in Bremen. We guarantee the legal limit of <20 mg/kg for gluten-free goods in accordance with Regulation 828/2014 if this has been agreed on an order-specific basis. The processing steps of the pulses are then consistently separated from the grain processes or corresponding cleaning on steps are incorporated. Our process stage control has confirmed that in this way we reproducibly fall below the legal limit in the bagged Fava bean products.

Transport:

For goods supplied in bulk, the silo vehicles comply with the requirements for transport containers according to the provisions of Regulation (EC) No. 852/2004 Annex II Chapter IV (transport). Silo trailers are checked for their hygiene condition and approved every time before loading. Silo trailers are sealed after loading in order to prevent manipulation of the goods after loading. Before loading of packed goods the vehicles are subject to a hygiene check.

Packaging:

Our products can be supplied in paper or plastic packaging in different pack sizes. The packing material is designed to come into contact with the foodstuffs and satisfies the requirements of Regulation (EC) No. 1935/2004. Furthermore, plastic packaging meets the requirements of VO (EG) 10/2011 and paper packaging meets the requirements of XXXVI. BfR recommendation. We have conformity declarations from the manufacturers.

Calibration law:

The requirements of the German Weights and Measures Act are complied with in our production sites. All product weights invoiced to customers are determined using calibrated scales.

Nanotechnology:

Our products do not contain any nanomaterials according to Regulation (EU) No 1169/2011.

Radiation:

Our raw materials have not been subject to any treatment with ionising radiation or ethylene oxide according to Directive 1999/3/EC. In addition, our raw materials do not contain any radioactive contamination. Grain is regularly tested for radioactivity in Germany. The values measured - especially for caesium-137 - are well below the EU limit of 600 Bq/kg (Regulation (EU) 2016/52) and are mostly below the detection limit (< 0.2 Bq/kg).

Free from animal ingredients:

The product contains no animal ingredients and is manufactured without the use of raw materials of animal origin.

2. Quality Management

Quality Management System:

Our production sites are certified by at least the International Featured Standard (IFS) Food, Q+S (GMP+ approved) and DIN ISO 50.001 (energy management). The relevant certificates can be viewed on our homepage at www.rolandmillsunited.de.

HACCP:

A HACCP system has been installed in every production site, which meets the requirements of Regulation (EC) No. 852/2004 and has been developed according to the standards of the Codex Alimentarius. As well as measures concerning potential chemical and microbiological risks, various fine sieves, magnetic separators and metal detectors have been installed, some of which are directly before loading, to minimise physical risks.

Pest monitoring:

A documented pest monitoring system based on risk analysis has been installed in all production sites. The monitoring, and if necessary, control measures, are only carried out with authorised methods and media by usually external experts.

3. Product Monitoring

Product analysis:

From goods-in to the loading of our end products, the entire production process is accompanied by analyses. External monitoring takes place in addition to these internal inspections.

Residues and contaminants:

All production sites participate in European Cereal Monitoring (ECM) and comply with the control frequency stipulated by it. The cereal samples are subject to risk-based testing for residues and contaminants in accordance with Regulation (EC) No. 2023/915 and Regulation (EC) No. 396/2005.

Microbiology:

The guidance and warning levels for cereal flour products of the German Society for Hygiene and Microbiology (DGHM) apply to cereals and end products. Testing is carried out within the scope of the ECM in accredited laboratories. Milling products are made of grain which contains a natural microflora. Milling processes include measures to reduce the level of microbiology but normally do not kill 100% of the microflora. This is done during heating in our customer's processes. Milling products and dough are not meant to be consumed without prior heating.

Baking tests:

To safeguard our dough rheology values we check our products regularly using standardised baking tests to achieve the desired baking quality.

4. Country of Origin of our Cereal Raw Materials:

In the operating facilities of Roland Mills United GmbH & Co. KG

- Roland Mills Nord GmbH & Co. KG (RMN)
- Roland Mills Ost GmbH & Co. KG (RMO)
- Roland Mills West GmbH (RMW)

wheat, rye, spelt, triticale and durum wheat are milled (in RMN also pulses). The raw materials can come from the following countries:

RMN: Germany, Czech Republic, Denmark, Sweden, Slovakia, Slovenia, Lithuania, Latvia, Poland, Hungary, Romania.

RMO: soft wheat => Germany Durum wheat => Germany, Czech Republic, Slovakia, Austria, Hungary, Poland in exceptional harvest-related cases also USA, Canada and Spain.

RMW: Germany, Netherlands, France, Denmark, Poland, Czech Republic, Hungary.

The country of origin of our ascorbic acid is China.

5. Hazardous materials

Our products are not hazardous substances within the meaning of REACH Regulation (EC) No. 1907/2006. Nevertheless, we have prepared product information sheets which we will be happy to supply on request.

6. Other product labels

Our products are suitable for the production of vegan and vegetarian food.