

HDO SK, s.r.o. · Vansovej 2 · 811 03 Bratislava

**Dear Customers**

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Ihre Nachricht vom  
Unser Zeichen **HDO-VB**  
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Myjava, 27 July 2026

**Implementation of the Packaging Regulations PPWR (VO 2025/40/EU) and VerpackDG\***

Dear Sir or Madam,

Please find below our statement regarding the implementation of the EU regulatory framework for packaging, namely Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) and the national Packaging Law Implementation Act (VerpackDG):

Our company is committed to complying with all applicable and relevant environmental regulations (Legal Compliance Principle) and to the continuous improvement of environmental protection. In addition, we have been continuously reducing our process-related environmental impacts for many years.

Three regulatory frameworks are currently relevant in Europe and Germany regarding packaging and packaging waste:

**1) Packaging Act (VerpackG) (expected to remain valid until 11 August 2026):**

the German Packaging Act (Act on the Placing on the Market, Return and High-Quality Recycling of Packaging (Packaging Act – VerpackG)),

**2) Packaging Law Implementation Act (VerpackDG) (expected to become valid from 12 August 2026):**

the Packaging Law Implementation Act (VerpackDG) adapts the national legal framework governing packaging waste to the PPWR.

**3) PPWR (in force in the EU since February 2025):**

Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste. Certain provisions of the regulation will apply from 12 August 2026 onward.

HDO SK, s.r.o.

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Spoločnosť je zapísaná v  
Obchodnom registri Okresného  
súdu Bratislava 1,  
Oddiel: Sro, vložka č.: 44851/B  
Konatelia: Ján Priebracha,  
Mag. Matúš Vidoman

**Regarding Packaging, we would like to inform you as follows:**

According to Recital 76 of the PPWR, we are not packaging specialists and do not have knowledge of the design and manufacturing processes of the packaging or packaging materials used by us.

In accordance with Article 21 PPWR, we generally do not modify the existing characteristics of packaging, meaning that the conformity of the packaging we procure remains unaffected.

Nevertheless, we are currently assessing the extent to which we are affected by the obligations applicable to manufacturers under Article 15 PPWR.

For this purpose, we have contacted our suppliers to obtain information required for the technical documentation in accordance with Article 16 of the EU Packaging Regulation (PPWR).

During supplier approval and goods receipt inspections, we exercise due diligence to ensure compliance with the requirements of the PPWR.

To identify cases of non-compliance, we are establishing quality management processes covering corrective and preventive actions.

As part of our internal organizational and quality management systems, we are implementing procedures and controls to ensure that these processes are carried out in a practical, legally compliant manner and contribute to the reduction of environmental impacts.

We will comply with the obligations of the PPWR applicable from 12 August 2026. Initially, the substance restrictions under Article 5 must be observed for the packaging used by us:

- The sum of the concentrations of lead, cadmium, mercury, and hexavalent chromium contained in packaging or packaging components must not exceed 100 mg/kg.

This requirement is already met by the packaging used by our company.

We are monitoring the national implementation of the PPWR through the VerpackDG and are currently evaluating any future requirements that may be amended or introduced.

In the event of market surveillance activities, we will cooperate with the competent authorities and provide all documentation required under the PPWR.

We hope that the above information adequately explains our implementation of the PPWR.

Best regards,

\* All information has been provided to the best of our current knowledge and belief. No warranties, guarantees, or other legally binding declarations regarding the completeness or accuracy of this information can be given. Any liability for damages arising from the use of this statement or reliance upon it is excluded.

  
Ján Priebracha; Managing Director

Michael  
Schäfers

ppa. Michael Schäfers; Head of Sales

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