Obligations under the Packaging Act (VerpackG, VerpackDG) and the EU Packaging Regulation (PPWR)

Prolytik Schmierstoffe GmbH
Hohenheide 99b
58730 Fröndenberg

Telephone
+49 (0) 2377-91900
+49 (0) 2377-919012

Mobile: 0152/28583960

Office address:
Westerhaar 17
58739 Wickede (Ruhr)

Mail
bjoern.straesser@prolytik.de
www.prolytik.de

Bank details
Volksbank Dortmund
Sort code 441 600 14
Bank account 6426245600
IBAN
DE76441600146426245600
BIC GENODEM1DOR

Sparkasse Unna
Sort code 443 500 60
Bank account 128017
IBAN
DE72443500600000128017
BIC WELADED1UNN

Managing directors
Prolytik Schmierstoffe GmbH
Frank Wopker
Björn Sträßer

Company register
Ort Hamm
HRB 6777

Tax reference number
31657630922

VAT registration number
DE269992609

Place of jurisdiction
Hamm

Wickede, August 2026

Dear Sir or Madam,

Thank you very much for your enquiry regarding the implementation of the Packaging Act (VerpackG), the future EU Packaging Regulation (Regulation 2025/40/EU) (PPWR) and the national implementing regulation (VerpackDG), to which we are pleased to respond as follows:

The overarching objectives of the PPWR – a greater focus on sustainability, circularity and the reduction of environmental impact – are in line with Prolytik's guiding principles and core values. The responsible and sustainable use of natural resources is a fundamental aspect for Prolytik Schmierstoffe GmbH and is therefore part of our corporate guidelines. Prolytik is committed to fulfilling its obligation to comply with the applicable and relevant environmental regulations (the principle of legal compliance) and to the continuous improvement of environmental protection. For many years, we have also been consistently reducing our environmental impact, such as energy consumption, waste and pollutants, both in production and in our products.

Three sets of regulations are currently applicable and relevant to the subject of packaging and packaging waste in Europe and Germany:

1) **VerpackG (noch gültig bis August 2026)**:
   the German Packaging Act (Act on the Placing on the Market, Take-Back and High Quality Recycling of Packaging (Packaging Act – VerpackG)
2) **PPWR (gültig in der EU seit Februar 2025):**
   Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste. The provisions are to be applied in parts in all EU Member States from 12 August 2026.
3) **VerpackDG:**
   The Packaging Law Implementation Act (VerpackDG) aligns the national legal framework for packaging waste with the PPWR.

We would like to provide you with the following information regarding packaging:

- Our company is subject to the regulations; we are an economic operator in a defined area within the meaning of the new definitions set out in the PPWR,
- We naturally comply with the obligations under the PPWR, which include, for example:
  - The minimisation requirement (Art. 10 PPWR),
  - compliance with sustainability requirements, including substance bans (Art. 5 et seq. PPWR),
  - reusability and recyclability (Art. 6 PPWR),
  - registration in the manufacturers' register (Art. 44 PPWR),
  - Labelling and information requirements (Art. 12 PPWR),
  - Due diligence obligations, in particular checks in the upstream supply chain (Art. 19 PPWR)

- We are closely monitoring the planned national implementation of the PPWR and are currently identifying any future requirements that may have changed,
- We are currently assessing the extent to which we are affected by the significantly more far-reaching and extensive obligations as a producer under Article 15 (conformity assessment procedures, EU declarations of conformity, preparation of technical documentation):
    - in accordance with Recital 76 of the PPWR, we are not experts in packaging – we are not familiar with the design and manufacturing processes of our packaging
    - in accordance with Article 21 of the PPWR, we do not alter the existing characteristics of the packaging, meaning that we do not compromise the packaging's conformity,

- during supplier approval and goods receipt, we exercise due diligence to ensure compliance with the requirements,
- where non-conformities are identified, we have established standard QM processes for corrective and preventive actions in accordance with the PPWR,
- in the context of market surveillance measures (e.g. regulatory inspections), we cooperate with the relevant authorities and provide the documents required under the PPWR,
- in accordance with Article 19(3) of the PPWR, there are confidentiality obligations and severely restricted obligations to provide information regarding internal documents and evidence. These are, in principle, reserved for the supervisory authorities,
- furthermore, in the context of the current environmental policy focus on the circular economy, we adhere to the long-established waste management principle (prevention, reduction, recycling, disposal) in relation to our packaging as well,
  as part of our internal organisational processes, we have implemented internal procedures and controls to ensure that these processes are carried out pragmatically and in compliance with the law in areas such as procurement, production and sales.

We hope that the information provided above has given you a clear and comprehensive understanding of the implementation of the PPWR.

If you require further information, please do not hesitate to contact us.

Björn Sträßer
Managing Director

Prolytik Schmierstoffe GmbH
Hohenheide 99b
58730 Fröndenberg

Telephone
+49 (0) 2377-91900
+49 (0) 2377-919012

Mobile: 0152/28583960

Office address:
Westerhaar 17
58739 Wickede (Ruhr)

Mail
bjoern.straesser@prolytik.de
www.prolytik.de

Bank details
Volksbank Dortmund
Sort code 441 600 14
Bank account 6426245600
IBAN
DE76441600146426245600
BIC GENODEM1DOR

Sparkasse Unna
Sort code 443 500 60
Bank account 128017
IBAN
DE72443500600000128017
BIC WELADED1UNN

Managing directors
Prolytik Schmierstoffe GmbH
Frank Wopker
Björn Sträßer

Company register
Ort Hamm
HRB 6777

Tax reference number
31657630922

VAT registration number
DE269992609

Place of jurisdiction
Hamm