SDK RESSOURCEN INNOVATIOUN NOHALTEGKEET CIRCULAR ECONOMY
SuperDrecksKëscht®

SuperDrecksKëscht® campaign (SDK)*

Environmental Statement 2024

for the reporting year 2023






*Chargé de mission: Oeko-Service Luxembourg S.A.

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Preliminary note on the terminology used in this environmental statement

Society does not consume waste, it consumes products. Therefore, the **SuperDrecksKëscht® campaign** does not talk about waste - regardless of the legal terms - but about products or end-of-life products or waste products as well as valuable and problematic products.

In this sense, recycling companies and waste recipients are referred to as reverse producers or product recipients, who treat the products delivered by the **SDK** using reverse production processes. Since the management of end-of-life products is a reflection of the consumer society, the **SDK** does not refer to waste management, but to the reverse consumer economy as part of the circular economy.

We believe that the terminology we use promotes and develops the appreciation of a sustainable circular economy and the social awareness of participating in it.

Gender and diversity statement

For ease of reading, this environmental statement generally uses the common masculine form for personal nouns and pronouns. Where personal designations are given only in the masculine form, they refer equally to men, women and diverse persons.

The **SuperDrecksKëscht® campaign** has signed the Diversity Charter Lëtzebuerg **(https://www.chartediversite.lu/en/)** and is thus committed to respecting the social diversity of people regardless of their origin, gender, age or disability/non-disability, to promote it in cooperation with its stakeholders and to fight against any form of discrimination.

1. Context and terminology

1.1 The SuperDrecksKëscht® campaign and the authorised operator

The **SuperDrecksKëscht® campaign** was launched in 1985 by the then Minister of the Environment, Robert Krieps. Since 1990, **Oeko-Service Luxemburg** (OSL) has been the operator (Chargé de mission) responsible for carrying out the missions of the **SuperDrecksKëscht campaign®**. The law of 25 March 2005, supplemented by the law of 15.07.2022, legally defines the operation and the financing of the **SuperDrecksKëscht® campaign**. The current Waste Management Act of 21 March 2012, last amended on 9 June 2022, defines other tasks of the **SuperDrecksKëscht® campaign**.

The **SuperDrecksKëscht® campaign** is a brand developed within the framework of the waste management tasks of the State of Luxembourg. It is based on the strategy defined by the EU, with the following hierarchy: prevention first, followed by preparation for reuse, recycling and any other recovery (e.g. energy recovery), and finally disposal.

The mission of the **SuperDrecksKëscht® campaign** is to use and implement the latest information in order to achieve a sustainable material economy in the ecological and economic sense with high quality. Fulfilment of this task will enable the implementation of a model function in the ecological reorganisation of our society. This role model function should provide impetus for all those involved in the economy to reduce the burden on the environment and increase resource efficiency.

The partners of the **SuperDrecksKëscht® campaign** are the Ministry of the Environment, Climate and Biodiversity, the municipalities, the Chamber of Skilled Trades and Crafts, and the Chamber of Commerce.

From a legal and organisational point of view, this environmental statement refers to Oeko-Service Luxembourg S.A. as the operator (chargé de mission) of the* SuperDrecksKëscht® campaign*. As chargé de mission, Oeko-Service Luxembourg S.A. assumes all legal and other binding obligations such as permits and contracts for the* SuperDrecksKëscht® campaign*. In this environmental statement, the term* SuperDrecksKëscht® campaign *and the abbreviation* SDK *are always used in the sense of this definition. The term "campaign" is also used in the sense of "organisation/company".

SDK RESSOURCEN INNOVATIOUN NOHALTEGKEET CIRCULAR ECONOMY SuperDrecksKëscht®

Campaigns of the Ministry of the Environment, Climate and Biodiversity with its partners: the municipalities, the Environment Agency, the Chamber of Skilled Trades and Crafts and the Chamber of Commerce

LE GOUVERNEMENT DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat et de la Biodiversité

LE GOUVERNEMENT DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat et de la Biodiversité
Administration de l'environnement

CHAMBRE DES MÉTIERS LUXEMBOURG

CHAMBER OF COMMERCE LUXEMBOURG
POWERING BUSINESS

Legal basis:

- **Laws of 25 March 2005 and of 15 July 2022 on the financing of the SuperDrecksKëscht® campaign**
- **Act of 21 March 2012 in the amended version of 09 June 2022 on waste management**

Chargé de mission (authorised operator): Oeko-Service Luxembourg S.A.

1.2 Introduction/foreword

The **SuperDrecksKëscht® campaign** is a brand developed within the framework of the waste management mission of the State of Luxembourg. Resources - Innovation - Sustainability - Circular economy: these four values determine the activities of the **SuperDrecksKëscht® campaign**. The **SDK's** mission is to use and implement the latest information in order to achieve sustainable materials management, both ecologically and economically, with a high level of quality.

Its focus is on the development and implementation of concepts for waste prevention, reuse and recycling, as well as the development and implementation of education and training programmes with social and economic relevance to environmental protection and waste.

All of **SDK's** activities have a positive impact on the climate. With the appointment of a Climate Protection Officer in 2020 and the establishment of a Climate Council in 2021, the **SuperDrecksKëscht® campaign** has given its climate protection strategy a new framework. A climate protection report (see pages 24 and 25) is therefore also included in this environmental statement. The **SDK** sees its activities as climate protection in action and has therefore incorporated this into the brand's external presentation.

The **SuperDrecksKëscht® campaign** has had its environmental management system at its Luxembourg site certified to ISO 14001 since 1998. The EMAS system was also introduced in 2017.

At the beginning of 2017, our environmental management system was certified for the first time in accordance with EMAS and the environmental statement was validated by a government-approved environmental verifier. You now have the 2024 edition of the environmental statement with the 2023 data.

The **SuperDrecksKëscht® campaign** is committed to the continuous improvement of its environmental performance and the management system required for this. The documented management system provides a binding framework for all activities and actions of **SDK** employees. With the additional certification of the environmental management system according to EMAS, we intend to further improve the specific environmental impact of our activities.

The **SuperDrecksKëscht® campaign** is committed to complying with all legal obligations that affect it. As part of its corporate policy and the implementation of the requirements of the EMAS system, the **SDK** has committed itself to firmly integrate environmental protection and the responsible use of natural resources, even beyond its actual area of responsibility in the field of waste management, and to provide its partners and customers with competent advice in this regard. However, the term "environment" does not only refer to "nature", but to the entire living environment, including people themselves.

We see our commitment in terms of our responsibility to society as a whole and have therefore been working with associations, civic organisations and the social economy for many years.

2. Profile of the company

2.1 Development

In the first phase, the **SuperDrecksKëscht® fir Bierger campaign** was launched with the aim of enabling citizens to separate problematic products (waste) from household waste and to dispose of them separately.

In the second phase (from 1992), the **SuperDrecksKëscht® fir Betriber campaign** introduced a waste management concept in small and medium-sized companies, enabling ecological waste management in the sense of a comprehensive separate collection of valuable and problematic products. During this phase, a brand identity was also developed to establish the **SuperDrecksKëscht® campaign** as a consumer brand - "away from the waste image".

Together with the awarding of the **SDK** quality label to participating companies, now certified according to the ISO 14024 standard, companies and institutions are supported on their way to responsible, environmentally friendly and resource-saving behaviour.

In the third phase, the issue of prevention/resource efficiency was increasingly included in the area of institutions/companies. Over time, the **SDK** has acquired extensive expertise in initiating and/or supporting waste prevention activities. Prevention is both qualitative (reduction of hazardous substances) and quantitative (reduction of quantities).

In addition, the "Shop Green" campaign (renamed "Clever akafen" – Clever Shopping - in 2022) has been involving consumers since 2007. Retailers and local producers participate not only in the **SuperDrecksKëscht® fir Betriber campaign**, but also in the trade and distribution of environmentally friendly and resource-efficient products.

In the fourth phase, launched in 2015, the **SDK** addressed a weakness in the circular economy with the resource potential tool - certified according to ISO 14024. The tool makes it possible to examine and evaluate both the recycling processes at the reverse producer and the use of old products in new production processes in terms of resource efficiency.

In 2018, additional activities were added under the auspices of the **SDK**, such as the ECOBOX, as part of the national campaign against food waste. In order to make the **SDK**'s development clearly visible to the outside world, the corporate design was modernised and the core elements of the activities "resources, innovation, sustainability and circular economy" were incorporated into the new logo.

Finally, in 2020, the **SDK**'s training department was renamed **SDK Akademie** and reorganised conceptually.

Selective collection of waste products

Consultancy

Promotion of* Shop Green *products in retail

2. Profile of the company

2.2 Activities and products

The **SuperDrecksKëscht® campaign** uses a number of tools to carry out the missions described above:

▶ The vehicle fleet

For the collection and transport of waste products, the **SuperDrecksKëscht® campaign** has a fleet of vehicles of various types, ranging from small vans and hook-trucks for transporting containers to medium-sized semi-trailers.

The **SDK** also works with partners who collect and recycle products such as used oil, brake fluid, coolant, contaminated fuels, emulsions and used tyres.

Most of the waste products are transported to the product recipients by partner companies.

The service centre

▶ The logistics centre

The **SuperDrecksKëscht® campaign** operates a logistics centre for waste products in L-Colmar-Berg. The treatment of the products ranges from simple temporary storage, picking and sorting to preparation for recycling (dismantling or shredding).

For quality assurance purposes, a number of products are analysed by the company's own laboratory. This is both to ensure clear, ADR-compliant declarations and to guarantee compliance with the quality specifications of the product recipients/reverse producers. The fact that various types of waste are returned to product status through sorting and subsequent quality control is groundbreaking in this context. At present, this includes eyeglasses, candle and wax residues, pallets for repair and reuse, and packaging chips.

Sorting of medicines

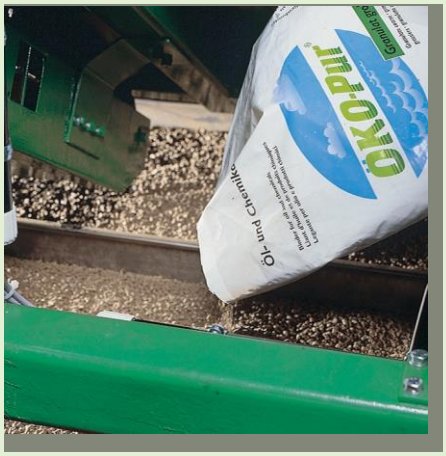
The **SDK** has a stock of collection containers of all types and qualities (cardboard, plastic, metal) for its own use, as well as for sale or transfer to customers).

▶ Products

In addition to the sale of collection containers and accessories for collection points, the **SuperDrecksKëscht® campaign** also sells the oil binder ÖKO-Pur, a product derived from the reverse production of refrigerators and freezers.

As part of the ECOBOX project, a reusable food takeaway system launched in 2018, the **SDK** has taken over the management and distribution of plastic trays.

Other products include the LECOBOX (small container for separate collection of waste products on construction sites) and the Ecobelle (waste container) in 5 different versions.



Use of ÖKO-Pur

2. Profile of the company

2.3 Expertise

▶ Consultancy activities

Advising local authorities, citizens, companies/institutions and other partners is the second focus of the activities of the **SuperDrecksKëscht® campaign**. The consultants are largely field-based and use the **SDK**'s own fleet of mostly electric vehicles.

They focus mainly on waste product prevention and sustainable resource management. In addition to advising citizens on selective collection and waste product prevention, the focus is on developing operational waste management concepts for institutions and companies and, since 2018, specific campaigns as part of the government's initiative against food waste or to promote the repair and reuse of products:

- Offering environmentally friendly products in retail (Shop Green)
- Waste management and prevention in the construction sector
- Waste management and prevention in residential buildings
- Circular economy and resource potential (waste collectors and product recipients)
- Intelligent use of resources (food, reuse of products)

Consultancy activities on waste product prevention

▶ Training (SDK Akademie)

The **SuperDrecksKëscht® campaign** has further expanded its range of training programmes. In addition to education and training for people working in the field of waste management (resource centres, operational waste management), this mainly concerns training courses on ecological cleaning ("Clever Botzen"). On 13 March 2014, the **SDK** operator was officially recognised as a training institution. As of 04 March 2024, the **SDK Akademie** has been certified in accordance with ISO 21001: 2021.

Training courses

The **SuperDrecksKëscht® campaign** is also active abroad in a franchise system through the operator Oeko-Service Luxembourg S.A., namely in Germany, Switzerland and Sweden. These operators work according to the **SDK**'s guidelines.

The **SDK**'s activities have been recognised by the EU Commission. In 2009, the "Clever akafen" activity was awarded the "best practice" label, and in 2010 the overall activity in the area of resource conservation and climate protection was also recognised. In a note from the European Commission published in the Official Journal of the EU in November 2020, the **SDK fir Bierger** and the residential buildings project were named as examples of best practice across Europe. The resource potential as a circular economy tool has been included in the EU Circularity Platform in 2022.

2. Profile of the company

2.4 Organisational structure and premises

The team-oriented organisational structure of the **SuperDrecksKëscht® campaign** is shown in the chart on the next page.

The number of employees of the **SuperDrecksKëscht® campaign** at the end of 2023, including the management, was 86.

The logistics centre is located in a commercial/industrial zone directly on the A7 motorway, Colmar-Berg / Roost exit.

Public transport (bus) is available, but only at limited times. Colmar-Berg has a railway station which is not in the immediate vicinity of the industrial zone.

There are no nature or water protection areas in the immediate vicinity.

The company premises (site) border directly on a residential area (Rue du Faubourg). This is the rear of the logistics centre, which is separated from the residential area by an approximately 100 m long green strip. There is normally no traffic - neither of goods nor of people.

SDK employees

2.5 Compliance

The **SuperDrecksKëscht® campaign** has listed its legal and other binding obligations, including the relevant laws, in a checklist and uses the official **internet platform legilux.lu** to check that it is up to date. The list is regularly updated and evaluated accordingly.

Particularly relevant are the adjacent laws, the Waste Management Act and the law on the operation and financing of the **SuperDrecksKëscht® campaign** (see page 3).

The **SuperDrecksKëscht® campaign** has the following authorisations:

- Import licence for waste products
- Intermediary, dealer and transporter licence for waste products
- Authorisations under waste legislation
- Waste water licences
- Commodo-incommodo licences

All safety-relevant facilities are listed in the commodo-incommodo licences. These are operated as specified.

The other **binding obligations** towards the municipality and other stakeholders are also set out in the checklist.

The **SuperDrecksKëscht® campaign** undertakes to ensure that all legal and other binding obligations are met.

	Abfallwirtschaftsgesetzgebung
1.	Loi du 21 mars 2012 relative à la gestion des déchets, et modifiant 1. la loi du 31 mai 1999 portant institution d'un fonds pour la protection de l'environnement; 2. la loi du 25 mars 2005 relative au fonctionnement et au financement de l'action SuperDrecksKëscht; 3. la loi du 19 décembre 2008 a) relative aux piles et accumulateurs ainsi qu'aux déchets de piles et d'accumulateurs b) modifiant la loi modifiée du 17 juin 1994 relative à la prévention et à la gestion des déchets; 4. la loi du 24 mai 2011 relative aux services dans le marché intérieur
2.	Loi du 3 décembre 2014 modifiant 1) la loi modifiée du 19 décembre 2008 a) relative aux piles et accumulateurs ainsi qu'aux déchets de piles et d'accumulateurs b) modifiant la loi modifiée du 17 juin 1994 relative à la prévention et à la gestion des déchets; 2) la loi du 21 mars 2012 relative aux déchets
3.	Règlement grand-ducal du 24 mars 2015 remplaçant l'annexe V de la loi modifiée du 21 mars 2012 relative aux déchets
4.	Règlement grand–ducal du 24 novembre 2015 modifiant l'annexe II de la loi modifiée du 21 mars 2012 relative aux déchets.
5.	Loi du 18 décembre 2015 modifiant la loi modifiée du 21 mars 2012 relative aux déchets
	SDK-Gesetzgebung (Funktion und Finanzierung)
1.	Loi du 25 mars 2005 relative au fonctionnement et au financement de l'action SuperDrecksKëscht.
2.	Loi du 20 avril 2009 relative à la responsabilité environnementale en ce qui concerne la prévention et la réparation des dommages environnementaux.
3.	Loi du 28 juillet 2014 modifiant l'article 6, paragraphe 1er de la loi modifiée du 20 avril 2009 relative à la responsabilité environnementale en ce qui concerne la prévention et la réparation des dommages environnementaux.

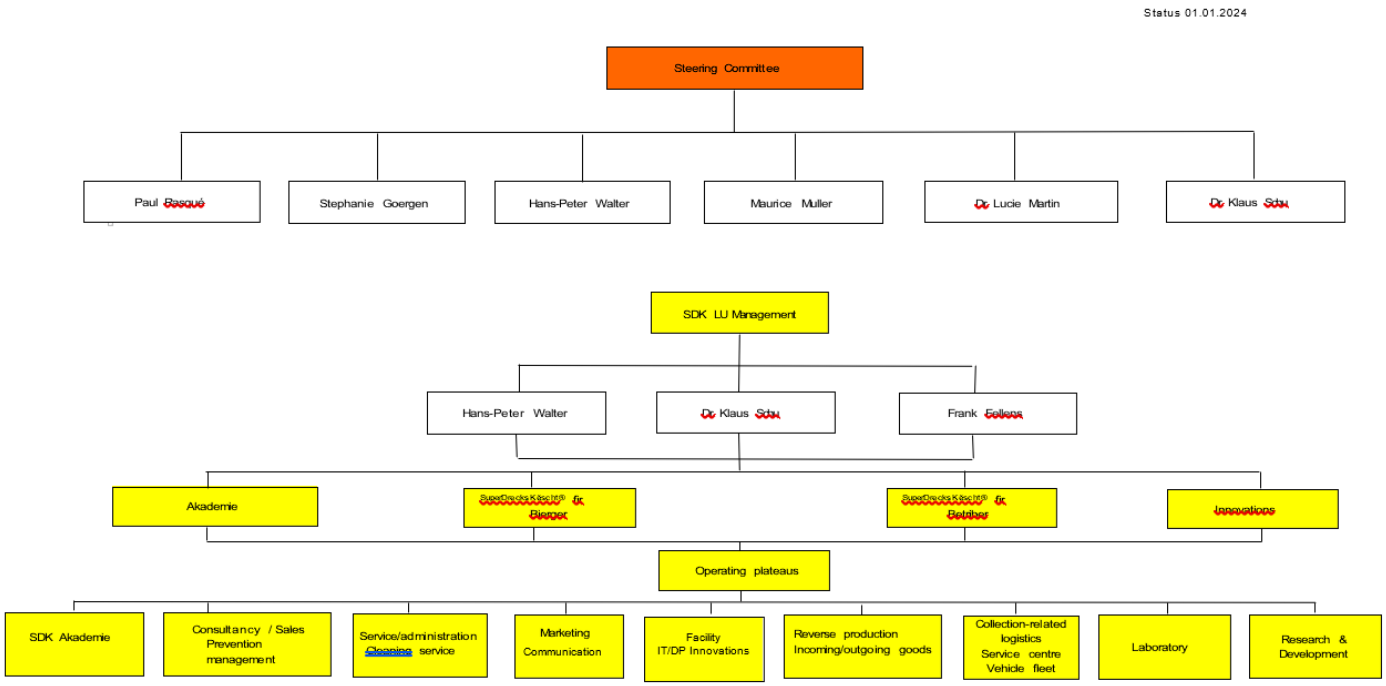
Extract from the Official Gazette
Status/last update: December 2023

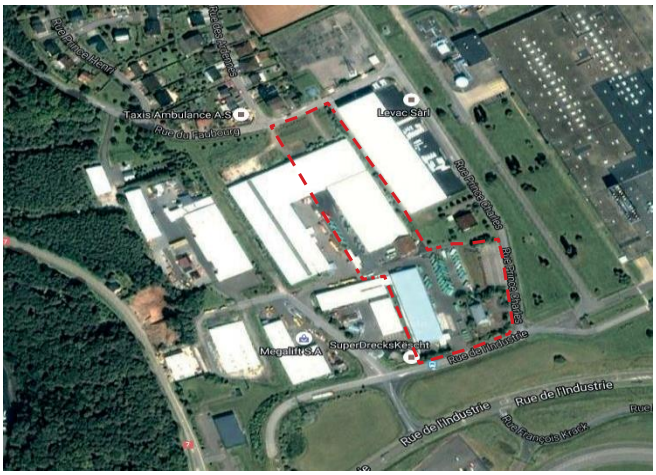
▶ Note on the sectoral reference document on waste management (Decision (EU) 2020/519)

The best practices mentioned in the reference document - waste management strategy, specific waste management plans, promotion of waste prevention, reuse, waste treatment for material recycling (circular economy) - are among the core tasks of the **SuperDrecksKëscht® campaign** (see also the environmental programme, in particular the indirect environmental aspects). The resource potential tool developed by the **SDK** in accordance with ISO 14024 is of particular importance here. A review of the reference document shows that the recommendations are largely met, where applicable. For example, the environmental performance key indicators specified in the document have been used for a long time (e.g. for the collection of healthcare waste from private households). The document will continue to be consulted regularly and the relevance of the references and environmental performance indicators will be reviewed.

Organisation chart and premises

Organisation chart of the structure of the SuperDrecksKëscht® campaign (SDK) – the operator Oeko-Service Luxembourg S.A.





The organisation chart for 2023 has not changed since last year. Only the representatives of the the Environment Agency and the Chamber of Skilled Trades and Crafts have changed.

The site plan shows the premises of the logistics centre in the industrial zone Piret, Colmar-Berg (outlined in red) and the adjacent buildings.

3. The environmental management system of the SuperDrecksKëscht® campaign

3.1 The environmental management system

Since the introduction of ISO 14001 in 1998, the environmental policy and its environmental guidelines have become the basis for the implementation of the environmental management system (EMS) and the continuous improvement of the company's environmental performance. It documents the responsibility of the company management and all employees towards the environment and the transparency of environmental performance towards customers, owners, business partners and other interested parties.

Various documents serve as a guide for all employees, in particular the training documents **"Brand SuperDrecksKëscht® campaign'"**, "ISO 14001", "ISO 14024" and "ESR-Label", the annual reports / sustainability reports and the **SDK** handbook. They provide information on the purpose and implementation of the EMS, internal processes, responsibilities and relevant legislation.

The management of Oeko-Service Luxembourg S.A., the operator of the **SuperDrecksKëscht® campaign**, is responsible for the continuous development of the system. The Steering Committee (SC) advises and discusses all relevant issues, makes recommendations and submits proposals. The SC is supported by the Environmental Management Officer (EMO) and other authorised persons. The EMO keeps the EMS documentation up to date, including all key figures, prepares the environmental statement and is the contact person for employees and those with functions relevant to environmental protection (e.g. administration: environmental aspect of "Procurement of goods and services").

The EMO also co-ordinates all matters related to the EMS and informs the Steering Committee on behalf of management about the development of the system. Based on this information, the SC makes recommendations after consultation and discussion. Management provides the necessary resources for the continuation of the environmental programme.

The EMS is designed to be a dynamic system. **Every employee** can and should be involved in the development of the EMS and contribute to the achievement of the environmental objectives. Therefore, an internal suggestion scheme enables all employees to submit change requests and suggestions.
Management and the EMO are available to employees for questions and suggestions. Information is also exchanged through direct

communication (meetings, hallway chats, internal e-mails) and, when appropriate, incorporated into the EMS.

As part of the sustainable development and the stakeholder management programme, two new bodies were created in 2022: the Climate Protection team and the CSR team, which support the EMO on related issues.

As part of the implementation of the Whistleblower Protection Act of 16 May 2002, two reporting channels have been established. The reporting channels are used for the confidential reporting of complaints, objections and claims. A member of the Works Council is available to employees. The Environmental Management Officer is available to all professional stakeholders and those involved in the ISO 14024 certification. This also applies to reports concerning the protection of human rights.

The **Logistics Centre Monitoring Committee** meets three times a year. Its members include the Steering Committee, the Management, the Safety Officer and the EMO of the **SuperDrecksKëscht® campaign**, neighbours, representatives of the municipality and the emergency services (fire brigade) of Colmar-Berg.

The process of the environmental management system based on the environmental policy is as follows: definition of environmental objectives ➔ detailed reports ➔ assessment ➔ planning measures ➔ implementation ➔ monitoring of results

Regular internal and external environmental audits and **employee involvement** are designed to promote continuous improvement in environmental performance by updating the environmental objectives and keeping the EMS running.

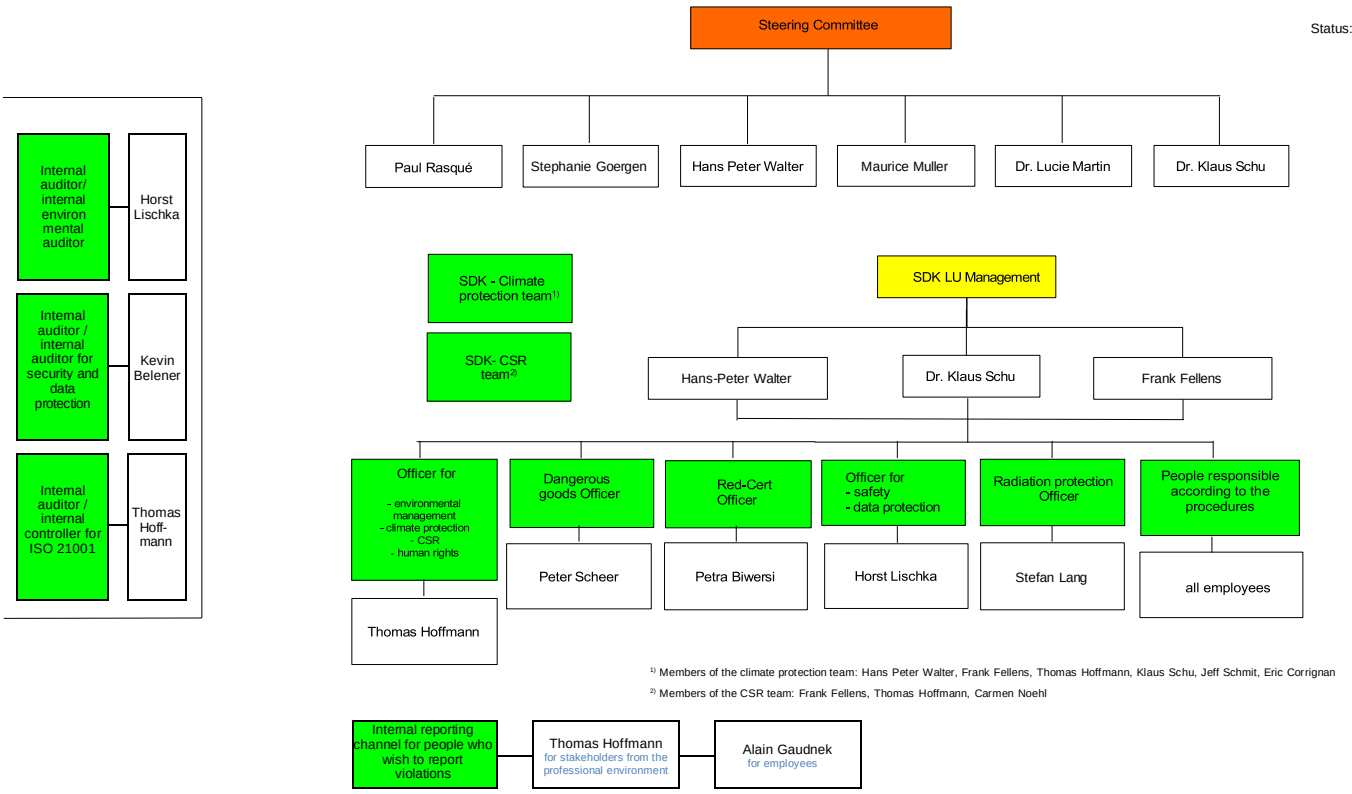
Through the publication of the environmental statement, which is regularly updated and validated by an external environmental verifier, we inform customers, business partners and **other interested parties** about the company's environmental performance. Interested parties are listed in the annual report/sustainability report and assessed using an opportunity/risk matrix.

Other relevant reports are:

- the climate protection report,
- the CSR Officer's report,
- the report on the protection of human rights.

Overview of the Steering Committee, the people in charge and the company representatives

Organisation chart steering committee with management and environmental management officer



3. The environmental management system of the SuperDrecksKëscht® campaign

3.2. The environmental policy

The actions and activities of the **SuperDrecksKëscht® campaign** and its employees are based on the following principles and binding guidelines:

The core competences of the **SuperDrecksKëscht® campaign** are the aspects of an ecological and sustainable economy and the relevant advice for consumers, institutions and companies with regard to consumption and waste management, in particular with the aim of avoiding waste.

In addition to the **SDK**'s responsibility to protect the environment, social responsibility is also of key importance in the company's activities. The following applies:

The activities of the **SuperDrecksKëscht® campaign** are always planned and carried out - with the active involvement of employees - in such a way as to save natural resources as much as possible, minimise harmful environmental impacts and comply with applicable legislation.

In order to continuously improve environmental performance, the Steering Committee sets targets and updates programmes for their implementation.

Performance indicators are defined and made publicly available to measure and monitor environmental performance.

When purchasing products and services, the **SDK** gives preference to those that are produced or provided in accordance with the principles of resource-efficient and sustainable management. As far as possible, the **SDK** encourages its business partners and suppliers to operate according to the same principles.

The **SuperDrecksKëscht® campaign** promotes environmental knowledge and awareness among employees through continuous training and motivates them to act responsibly, even beyond their work.

The impact of the **SDK**'s current and future site activities on the local environment is regularly monitored and assessed.

3.3. Corporate social responsibility[1)]

As mentioned above, the environmental policy also includes important social aspects.

Since 2011, the **SuperDrecksKëscht® campaign** has participated in the national certification system RSE-Label and is certified as a socially responsible company. In this context, the **SDK** has also signed two voluntary commitments: the Diversity Charter in 2019 and the National Business and Human Rights Pact in 2022. See the CSR Officer's report and the Human Rights Officer's report.

ESR ENTREPRISE RESPONSABLE
Stratégie RSE ▪ Gouvernance ▪ Social ▪ Environnement

RESPONSIBILITY EUROPE RE CSR LABEL

1) **Note :** Corporate Social Responsibility (CSR) reports and certificates, including the Human Rights Pact, are not validated by the environmental audits.

Criteria and tasks for the implementation of the environmental policy (Colmar-Berg site): in implementing the environmental policy described in section 2.1, the following environmental code of conduct applies:

Environmental code of conduct

The **SuperDrecksKëscht® campaign** is a resource efficiency brand developed as part of the sustainability of the waste management tasks of the State of Luxembourg. It is based on the EU waste hierarchy and the national legislation of 2012: prevention first, followed by preparation for reuse, recycling and any other recovery (e.g. energy recovery), and finally disposal. Accordingly, the focus is on prevention and thus on resource management.

The mission of the **SuperDrecksKëscht® campaign** is to use and implement the latest information in order to achieve sustainable resource management in an ecological and economic sense with high quality. Fulfilment of this task enables the implementation of a role model function in the ecological reorganisation of society. This role model function is intended to provide impetus for all stakeholders in the economy to reduce the burden on the environment and improve resource efficiency.

With this in mind, the **SuperDrecksKëscht® campaign** is committed to protecting the environment, fulfilling its legal and other binding obligations and continuously improving its environmental management system with the aim of improving its environmental performance.

In detail, the **SuperDrecksKëscht® campaign** has set itself the following objectives:

⇨ ***In the context of circular economy and resource management***

- **Saving raw materials through resource efficiency management**
- **Avoiding waste products**
- **Preparing waste products for re-use**
- **Recycling and recovery rather than disposal of waste products**
- **Smart and sustainable product design**
- **New production and reverse production processes**
- **Changing consumption patterns ("sharing economy")**
- **Transparency of all product flows**

⇨ ***In the context of preventive environmental and health protection***

- **Energy management and climate protection**
- **Environmental protection and sustainability of suppliers and processing partners**
- **Environmental accident prevention**
- **Environmental accident procedures - reduction of environmental impact**

⇨ ***In the context of social responsibility***

- **Taking into account the interests of all stakeholders**
- **Respect for social standards at local and global level**
- **Fair conditions for employees and partners**
- **Training, information and environmental awareness**

The following management tasks must be carried out in order to achieve the objectives set:

⇨ ***Direct measures***

- **Measures to minimise emissions during recycling, recovery and disposal of waste**
- **Prevention of accidental emissions and discharges**
- **Pre-evaluation of environmental and social impacts**
- **Environmental and social impact assessment**
- **Verification of compliance with the environmental code of conduct**
- **Actions in the event of non-compliance with the environmental code of conduct**

⇨ ***Indirect measures***

- **Promoting a sense of responsibility among employees**
- **Information and dialogue with all stakeholders**
- **Consultancy for all partners**
- **Adherence to environmental standards by suppliers and formal partners**

Effective from April 2021

Steering Committee

The environmental code of conduct as of April 2021

3. The environmental management system of the SuperDrecksKëscht® campaign

3.4. Interested parties - stakeholders

Stakeholders with whom the **SDK** cooperates and has joint projects are described in detail in the annual report/sustainability report and in the CSR Officer's report.

The **SuperDrecksKëscht® campaign** maintains a matrix listing all interested parties and their respective requirements and expectations. The resulting opportunities and risks are also identified and assessed on this basis. Due to its specific mission, the **SuperDrecksKëscht® campaign** often works as a networker in the field of consumption and reverse consumption. The list of stakeholders therefore includes almost all active players in society. The main opportunity is to support the **SDK**'s strategy on reverse consumption, the main risk is the lack of coherence.

In addition to the contracting authority and the partners of the campaign - which include all Luxembourg municipalities - the employees and the customers, the interested parties include contract partners, other public partners, environmental groups/associations/NGOs, civil protection (police, fire brigade), trade associations, companies, project partners/platforms/interest groups, training institutions, suppliers, the neighbourhood, the public and the media (see table below).

The Logistics Centre Monitoring Committee and the **ULC** (Union Luxembourgeoise des Consommateurs-Consumer Protection Association) play a special role here.

Neighbours, local residents, representatives of the civil protection services (police, fire brigade) and local authorities, as well as the Ministry of the Environment, the Environment Agency, the Chamber of Skilled Trades and Crafts and the Chamber of Commerce are kept informed of the activities of the **SuperDrecksKëscht® campaign**, in particular at the Colmar-Berg logistics centre, as part of the Monitoring Committee. The members have access to the premises at all times. The Monitoring Committee normally meets 3 times a year.

Communication with interested parties is multi-faceted and includes the following tools:

➔ Joint meetings and workshops

➔ Review of public statements, internal programmes and stakeholder initiatives

➔Participation/membership of stakeholder organisations

➔ Direct communication

➔ Information from the media and other public information sources

A separate stakeholder management checklist lists in particular the stakeholders and educational institutions that play a special role in the areas of circular economy and sustainable development. It also lists contact persons and topics. It is updated at least once a year.

Interested parties ISO 14001:2015 - 4.2

Category	Interested party	Obligations - Cooperation	Requirements and expectations	Communication	Opportunities	Risks
Contracting authorities and partners of the campaign	MECDD	Main contracting authority	Main contracting authority	Direct discussions	–	–
	Environment Agency	Main contracting authority	Main contracting authority	Steering Committee	–	–
	Chamber of Skilled Trades and Crafts	Member of the Steering Committee	Member of the Steering Committee	Steering Committee	–	–
	Chamber of Commerce	Member of the Steering Committee	Member of the Steering Committee	Steering Committee	–	–
	Municipalities	Legally responsible for household waste	The SDK as a service provider for the municipalities - consultancy/support	Individual discussions	Support for the SDK reverse consumption strategy	No coherence between municipality and the SDK strategy
	Communal syndicates	Legally responsible for household waste	The SDK as a service provider for the municipalities - consultancy/support	Individual discussions	Support for the SDK reverse consumption strategy	No coherence between municipality and the SDK strategy
	Recycling centres	Facilities for the municipalities and the communal syndicates	The SDK as a service provider for the recycling centres - consultancy/support	Meetings, individual discussions, training	Support for the SDK reverse consumption strategy	No coherence between municipality and the SDK strategy
	Ecobatterien	The SDK is both a service provider and a partner in communication with the public	Contractual performance of the service and compliance with the requirements of the rules of procedure	Meetings of the Monitoring Committee and direct discussions	Support for the SDK reverse consumption strategy: participation in innovation projects	Non-fulfilment of the convention

Extract from the specific stakeholder checklist Status/last update: March 2023

4. Environmental aspects and their potential environmental impact

4.1. Direct and indirect environmental impacts

The **SuperDrecksKëscht® campaign** has an impact on the environment through the processing and treatment of waste products at the Colmar-Berg logistics centre on the one hand, and through its consultancy and administrative activities on the other. Although the environmental impact of the consultancy activities is relatively small compared to the industrial and commercial activities, the objective is to minimise the environmental impact as much as possible by adopting an environmentally aware attitude.

The direct environmental aspects result from the immediate activities at the Colmar-Berg site. These include traffic-related emissions from the collection and transport of waste products.

Due to the nature of **SDK**'s activities, material efficiency (other than energy and water) is not significant within the company as no goods are produced.

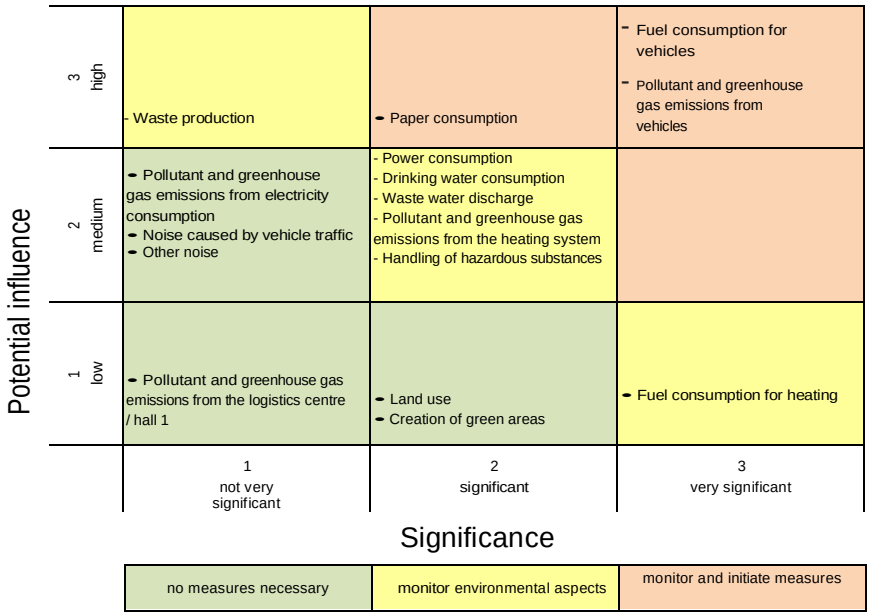
Indirect environmental aspects arise from consultancy activities and, for example, the procurement of office supplies and services (e.g. transport). transports).

Domain	Environmental aspect	direct/indirect	Activity	Environmental impact (risks)
Material efficiency, incl. energy (consumption of resources and raw material)	Paper consumption	d	Office work and consultancy activities	Resource consumption
	Power consumption	d	Handling of waste products in the logistics centre, office and consultancy activities	Resource consumption
	Fuel consumption for heating	d	Heating of logistics centre and administrative buildings	Resource consumption
	Fuel consumption for vehicles	d	Processing of waste products; consultancy activities	Resource consumption
	Drinking water consumption	d	Cleaning of containers, irrigation, sanitary facilities	Resource consumption
Waste water	Waste water discharge	d	Cleaning of containers, sanitary facilities	Release of environmentally harmful products
Waste	Waste production	d	Office and administrative activities, warehouse management, laboratory	Resource consumption
Emissions	Pollutant emissions from vehicles, machinery and heating systems	d	Processing of waste products; consultancy activities, heating of logistics centre and administrative buildings	Emissions of environmentally harmful gases
	Greenhouse gas emissions from vehicles, machinery and heating systems = Scope 1 (GHG Protocol)	d	Processing of waste products; consultancy activities, heating of logistics centre and administrative buildings	Emissions of climate-relevant gases
	Pollutant emissions from electricity consumption = Scope 2 (GHG Protocol)	d	Electricity for logistics centre and administrative buildings	Emissions of climate-relevant gases
	Pollutant emissions from the logistics centre /hall 1	d	Product handling in hall 1	emissions of environmentally harmful and climate-relevant gases
	General emissions related to indirect environmental aspects = Scope 3 (GHG Protocol)	i	Transport, procurement/purchasing, employees	Emissions of climate-relevant gases
Biodiversity	Land use	d	Logistics centre and administrative buildings	Land use
	Creation of green areas	d	Accompanying greenery	Native flora and fauna
Transport	Noise caused by vehicle traffic	d	Own transport; suppliers; hauliers	Noise
Procurement	Purchase of goods for the office and the consultancy activities	i	Office work, consultancy activities, public relations	Resource consumption; environmental aspects of the product manufacturing process
	Purchase of consumables	i	Logistics centre - containers and infrastructure	Resource consumption; environmental aspects of the product manufacturing process
Processing of products	Selection of transport providers	i	Transport of waste products; transport of consumables	Environmental aspects of transport
	Selection of partners and product recipients	i	Processing and recovery of waste products	Environmental aspects of transport; environmental aspects of the reverse production process
Product range (Shop Green)	Sustainable consumption of partners and consumers	i	Selection of eco-friendly products to be promoted in retail	Resource consumption; environmental aspects of the product manufacturing process
Other projects	Sustainable consumption of partners and consumers	i	Support for sustainable products	Resource consumption; environmental aspects of product use

Significant environmental aspects of the **SuperDrecksKëscht® campaign** Status/last update: February 2024

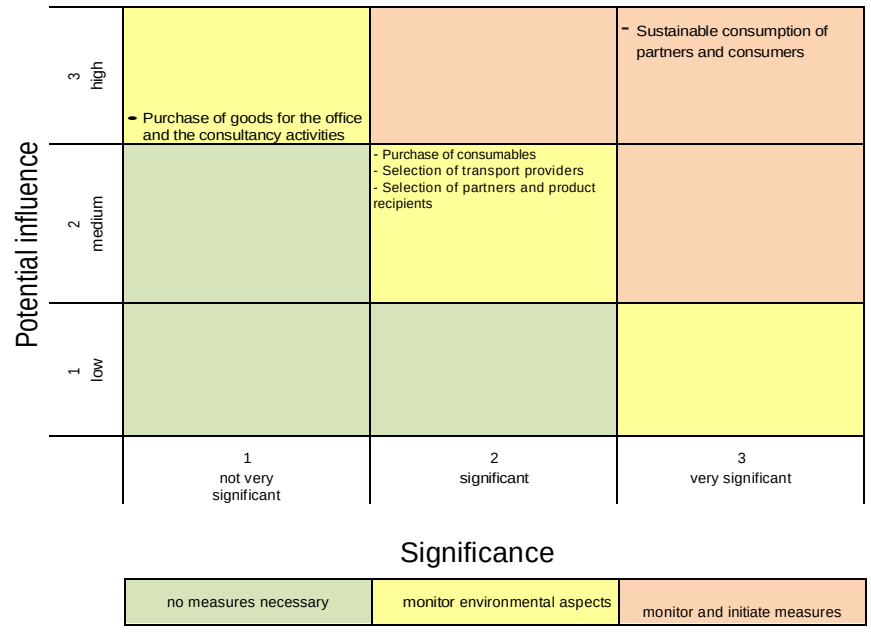
The environmental aspects identified are checked and evaluated at least once a year to determine whether they are still valid. As part of this assessment, the environmental aspects are classified according to their potential influence and their significance, on the basis of precise criteria. The assessment enables us to identify important and relevant environmental aspects, for which we set objectives and measures to improve our environmental performance (see chapter on environmental objectives, the environmental programme).

Presentation of direct and indirect environmental aspects and their assessment



Assessment of direct environmental aspects

Status/last update: February 2024



Assessment of indirect environmental aspects

Status/last update: February 2024

5. Environmental performance – environmental key performance indicators

5.1. Direct environmental aspects

In the following input/output balance, we have summarised the most important data on direct environmental aspects for the last 5 years (the 2019 and 2020 environmental statements are not comparable with the following ones, as the baseline data is different and data corrections have been made).

▶ Input

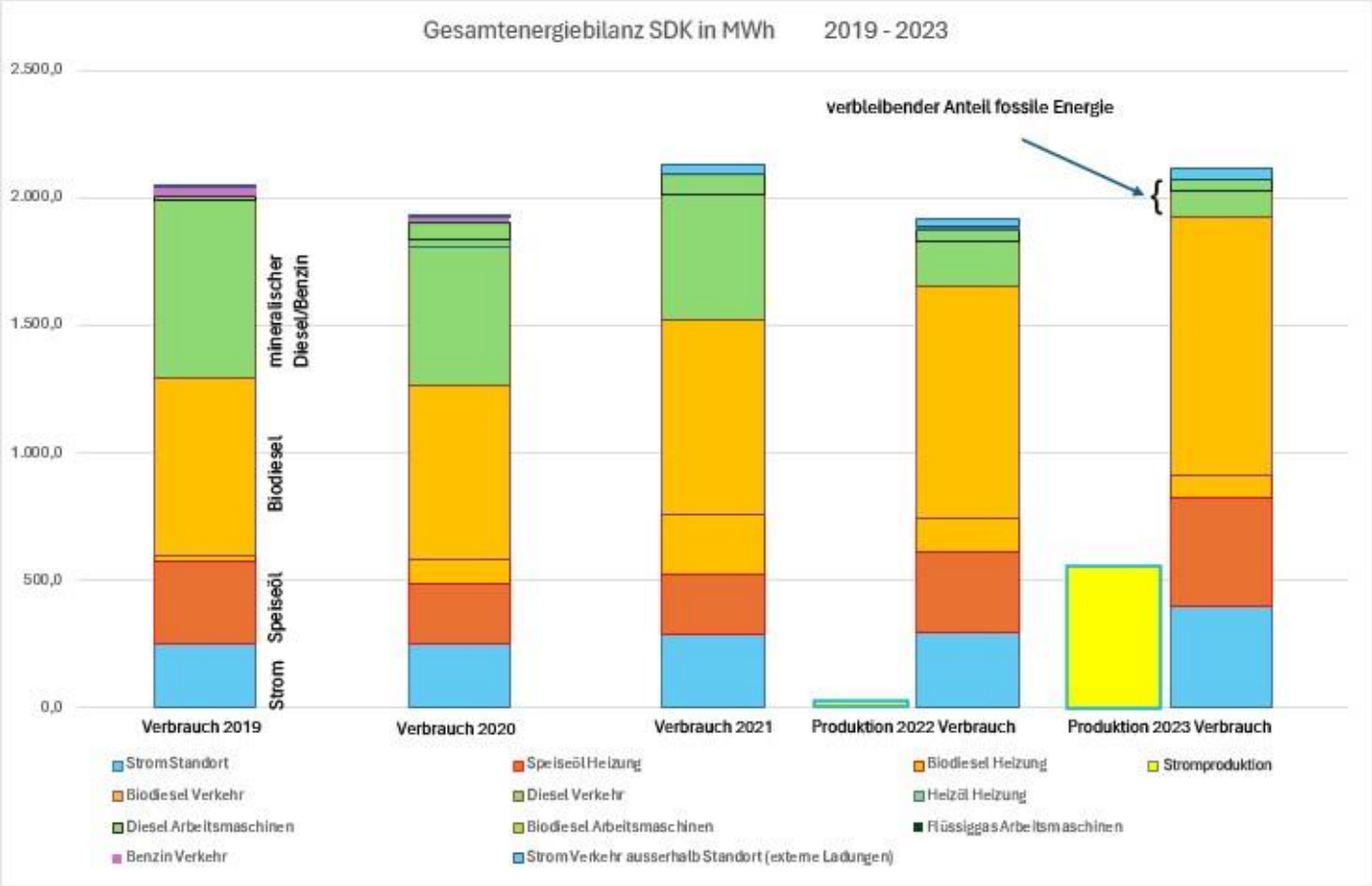
	2019	2020	2021	2022	2023		
Material							
Papierverbrauch[1)]	231.000	215.000	301.500	195.500	223.000	Blatt A4	Büro/Verwaltung
Energie	2.043.035	1.922.961	2.097.770	1.887.946	2.075.205	in kwh	Gesamt, davon
	254.794	254.887	290.012	300.308	399.758	kWh	Strom Standort
	34.007	24.600	24.739	33.732	45.595	l	Speiseöl Heizung
	3.011	11.732	28.235	14.897	9.897	l	Biodiesel Heizung
	0	3.000	0	0	0	l	Heizöl Heizung
	76.795	80.697	90.094	108.207	120.541	l	Biodiesel Verkehr
	68.933	55.834	50.597	17.977	10.071	l	Diesel Verkehr
	1.913	6.817	7.745	4.825	4.775	l	Diesel Arbeitsmaschinen
	0	0	0	737	137	l	Biodiesel Arbeitsmaschinen
	3.871	1.424	474	330	0	l	Benzin Verkehr
umgerechnet in kwh[2)]	318.174	230.256	231.557	315.732	426.769	kwh	Speiseöl Heizung
	27.345	99.018	238.303	125.731	83.534	kwh	Biodiesel Heizung
	697.423	681.080	760.395	913.265	1.017.367	kwh	Biodiesel Verkehr
	693.112	546.616	495.343	175.994	98.591	kwh	Diesel Verkehr
		25.320	0	0	0	kwh	Heizöl Heizung
	19.235	66.738	75.824	47.237	46.747	kwh	Diesel Arbeitsmaschinen
	0	0	0	6.220	1.158	kwh	Biodiesel Arbeitsmaschinen
	0	6.702	2.224	599	1.281	kwh	Flüssiggas Arbeitsmaschinen
	32.953	12.343	4.113	2.861	0	kwh	Benzin Verkehr
	23.577	33.467	66.226	100.858	184.251	kwh	Strom Verkehr (nicht in Gesamtsumme, da bereits in Strom Standort enthalten)
Anteil erneuerbarer Energien am Gesamtverbrauch	63,52%	65,80%	72,47%	87,99%	92,93%		(Grünstrom, Speiseöle, Biodiesel)
Wasser	1.414	1.819	1.787	n.b.	n.b.	m^3	Gesamt, davon
	1.179	1.393	1.234	n.b.	n.b.	m^3	Gemeindewasser
	235	426	553	657	712	m^3	Regenwasser
Grundstücksfläche	21.840	21.840	21.840	21.840	21.840	m^2	davon
	17.940	17.940	17.940	17.940	17.940	m^2	versiegelt
	3.900	3.900	3.900	3.900	3.900	m^2	Grünfläche

[1)] eingekaufte Mengen

[2)] Umrechnung Energie
Speiseöl; DIN EN ISO 3675, DIN EN ISO 51000-3
Basis: Energieetikette für Personenwagen Schweizer Bundesamt für Energie Jan 2017
Umrechnungswerte kg in l nach BDB- Bundesverband der deutschen Bioethanolwirtschaft
Deutscher Verband Flüssiggas e.V.

5.1 Direct environmental aspects

▶ Input – energy balance



Energy balance with electricity consumption on site and with external charging (blue), cooking oil (red), biodiesel (yellow) and fossil diesel (in 2020 also heating oil) in MWh. The graph shows that the share of fossil fuels has been significantly reduced again in 2023. See pages 21, 22 and 29 for more details.

▶ Output

	2019	2020	2021	2022	2023		
Stromerzeugung							
	0,00	0,00	0,00	9.563	575.999	kWh	PV-Anlage seit 30.11.2022

Emissionen							Gesamt, davon
CO_2 [1]	194.388,28	152.878,11	136.359,97	49.370,47	27.107,66	kg	Verkehr
NO_x	387,41	356,84	352,41	347,66	355,07	kg	Verkehr
Feinstaub	11,56	10,23	9,97	9,92	10,24	kg	Verkehr
TOC	2,75	8,46	16,95	65,93	2,39	kg	Logistikzentrum / Halle 1 [2]
CO_2		19.320,73	20.689,38	12.761,49	12.894,12	kg	Arbeitsmaschinen [3]
CO_2	0	0	0	0	0	kg	aus Strom [4]
CO_2	0	8760	0	0	44,92	kg	aus Heizung [5]
CO	20	54	-	100,5	97	ppm	aus Heizung [6]
Gesamt CO_2 (Scope 1)		180.958,84	157.049,35	62.131,96	40.046,70	kg	

Abfall	9.891	11.231	15.268	41.212	70.688	kg	Gesamt, davon [7]
				12.752	24.021	kg	Abfall aus Rückproduktion [8]
	716	624	300	270	7.700	kg	Erdaushub/Grünschnitt
	1.854	3.640	1.173	9.846	2.230	kg	Altbestände /Archive
	4.600	2.700	8.442	14.472	32.358	kg	Öl- und Fettabscheiderinhalt
	2.721	4.267	5.353	3.872	4.379	kg	aus Büro, Verwaltung

1) hier sind nur die durch fossile Treibstoffe verusachten CO_2-Emissionen angegeben
2) da die Emissionen sehr gering sind (maximal zugelassener Wert von 400 kg TOC) , ist der Einfluss der Umgebungsluft hoch
3) die Werte wurden 2020 erstmals ermittelt
4) 100 % Naturstrom aus erneuerbaren Energien, daher CO_2-Neutralität
5) 2019/2021-2022: 100 % Biodiesel resp. Speiseöle, daher CO_2-Neutralität; 2020 wurden ausnahmsweise 3000 l Heizöl genutzt; 2023 CO_2-Wert basierend auf Ökobilanz von 2022; ansonsten nur CO-Werte vorhanden
6) 2018-2019 Mittelwert der Messungen - kein Totalwert; 2020 Mittelwert aus einer Messung, 2021 kein Messwert vorliegend - 2022 Mittelwert aus einer Messung; Commodo-Incommodo-Genehmigung schreibt lediglich Stichproben alle 2 Jahre vor.
7) Die Zahlen 2022 und Vorjahre sind nicht vergeichbar (siehe Details zum Abfall).
8) ab 2022 erstmal erhoben

1) Emissionen: Die Berechnungsmethode wurde 2021 umgestellt und die Daten an neu berechnet.
Die Daten aus den Umwelterklärungen 2019 und 2020 sind daher nicht mit den Folgenden vergleichbar.
Datenbasis der Berechnung CO_2equ neu: nach Verbrauch in DLSV-Leitfaden Berechnung von THG-Emissionen (Tank to Wheel) Stand 20
sowie ab 2023: aus Tabelle K.1 - DIN EN ISO 14083:2023 Quantifizierung und Berichterstattung über Treeinhausgasemissionen von Transportvorgängen (ebenfalls Tank to Wheel)
Datenbasis Stickoxide und Feinstaub neu: nach Verbrauch in kWh/l - Maximalwerte aus der Norm Euro 6

Notes on the energy balance:

In 2023, 78.25% of the vehicle fleet's energy consumption was covered by biodiesel purchased from partners who esterify the collected cooking fats/oils into biodiesel. As a result, the company's own activities have replaced fossil diesel and significantly reduced CO_2 emissions (see CO_2 balance sheet).

Since 2015, used cooking oil has been used directly as fuel for the site's central heating system. The direct use of cooking fats/oils is CO_2 neutral. Otherwise, biodiesel has been used for heating. This is also CO_2 neutral (except 2020).

Details on the individual environmental aspects can be found on the following pages. Further information on the direct environmental aspects can be found in the Environmental Management Officer's 2023 report, which is available on request.

5.1 Direct environmental aspects

▶ Energy: electricity

Total electricity consumption increased by 33.1% to 399,758 kWh in 2023. This is due to an increase in the proportion of electricity used for charging electric vehicles, as a result of the provision of company cars for commuting.

Since 2020, the share of electricity consumed by electric vehicles has been calculated separately for the different types of charging (charging at the logistics centre, public charging points and private charging according to user information). Charging at the logistics centre is provided by 8 charging columns with 2 charging points each, as well as additional high-voltage plugs on the logistics centre site, in particular in hall 1 (warehouse entrance and exit/reverse production). The estimated share of EV charging at the logistics centre in 2023 is 141,171 kWh or 36.06%. The likely share in 2019 has been extrapolated (the first EVs were purchased at the end of 2017).

Excluding consumption for charging electric vehicles, the **SDK** centre's electricity consumption increased by 10.1% from 232,037 kWh to 255,587 kWh, which corresponds to the 2021 level and is within the expected fluctuation range. Relative to the number of employees, consumption increased to 3,551.8 kWh, which is also within the fluctuation range.

Green electricity

The **SuperDrecksKëscht® campaign** has been using green electricity (Enovos Naturstrom) for several years.

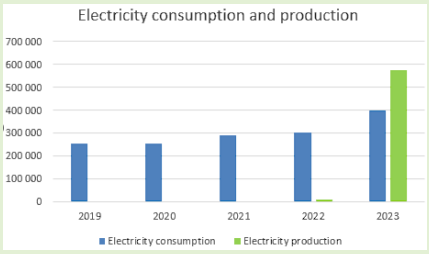
Electricity production

The PV system was connected to the grid on 30 November 2022. In 2023, a total of 575,999 MWh of electricity was produced. In 2023, 176,241 kWh more electricity was produced than consumed.

Impact

The use of electricity from renewable energy sources has minimised the impact on the environment. The use of fossil fuels is avoided. The use of green electricity is CO_2 neutral. Thanks to the PV system, the site produces a significant part of its own consumption.

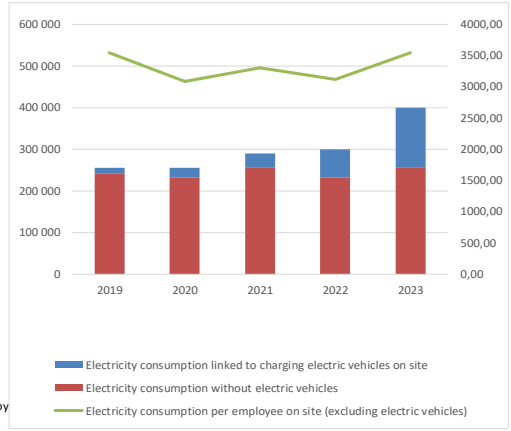
Photovoltaic (PV) system in 2022



Electricity consumption

	2019	2020	2021	2022	2023	
Adjusted* number of employees	68,31	75,37	77,24	74,36	71,96	
	2019	2020	2021	2022	2023	
Electricity consumption	254 794	254 887	290 012	300 308	399 758	in kWh
Electricity production	0	0	0	9 563	575 999	in kWh
Balance	-254 794	-254 887	-290 012	-290 745	176 241	in kWh
Electricity consumption linked to charging electric vehicles on site	12 434	21 888	35 018	68 272	144 171	
of which electric vehicles[1)]	4,88%	8,64%	12,07%	22,73%	36,06%	
Electricity consumption without electric vehicles	242 360	232 999	254 994	232 037	255 587	
	2019	2020	2021	2022	2023	
Electricity consumption per employee on site (excluding electric vehicles)	3548,19	3091,40	3301,32	3120,45	3551,79	in kWh per employ

kWh per employee total kWh



[1)] Determined by a survey of users kWh/100 km, less external charges

5.1 Direct environmental aspects

▶ Energy: heating

Heating

Since 2015, the entire site has been supplied with heat via a central heating system in hall 1.

Total fuel consumption at the Colmar-Berg site in 2023 was 55,492 litres, of which 45,595 litres (42,175 kg) was used cooking oil and 9,897 litres was biodiesel. This represents an increase of 14.2% compared to the previous year. This is due to the slightly lower calorific value of used cooking oil, weather-related fluctuations and fluctuations in demand for reverse production.

This means that more than 80% of the energy demand was covered by used cooking oil. Using these two heating fuels saves fossil fuels. In terms of CO_2 equivalents, this corresponds to a saving of 137.3 tons of CO_2 compared to 100% fuel oil (see also the CO_2 balance sheet).

The aim is to further increase the proportion of used cooking oil from Luxembourg's national collection of problematic products.

Emissions and odours from the use of used cooking oil have not been a problem.

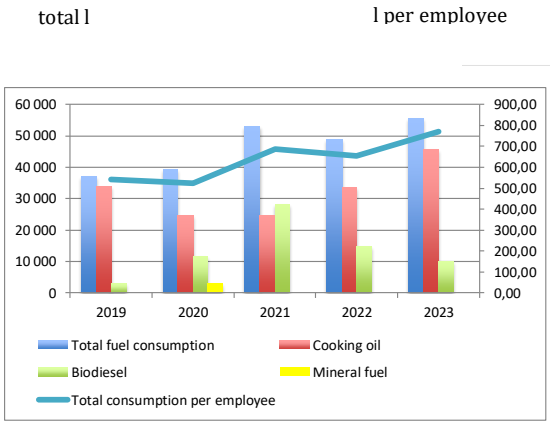
Impact

The use of biodiesel and used cooking oil since 2015 has minimised the impact on the environment. Fossil fuels are generally not used, except in well-founded individual cases. The use of biodiesel and used cooking oil is CO_2 neutral. Transport distances are minimised, especially with the use of used cooking oil, which is collected exclusively in Luxembourg.

[1] Calculated on the basis of 0.266 kg CO2 /kWh according to the German Federal Environment Agency / Brandenburg State Office for the Environment 2017.

Treatment of used cooking oil for the heating system

	2019	2020	2021	2022	2023	
Adjusted* number of employees	68,31	75,37	77,24	74,36	71,96	
	2019	2020	2021	2022	2023	
Total fuel consumption	37 017	39 332	52 974	48 611	55 492	in l
Cooking oil	34 007	24 600	24 739	33 732	45 595	in l
Biodiesel	3 011	11 732	28 235	14 879	9 897	in l
Mineral fuel		3 000	0	0	0	in l
	2019	2020	2021	2022	2023	
Total consumption per employee	541,94	521,86	685,84	653,72	771,16	in l per employee
Cooking fat consumption per employee	497,86	326,39	320,29	453,63	633,62	in l per employee
Biodiesel consumption per employee	44,08	155,66	365,55	200,09	137,54	in l per employee
Diesel consumption (min.) per employee	0,00	39,80	0,00	0,00	0,00	in l per employee



Cooking oil: basis balance sheet of quantities processed in the logistics centre in 2023

Biodiesel: basis balance sheet of quantities processed in 2023

5.1 Direct environmental aspects

▶ Water / waste water

Process water

Due to technical problems with water meters on the part of the municipality of Colmar-Berg, there is no reliable data on drinking water consumption in 2023. Despite intensive efforts by the management and the Environmental Management Officer, no solution has been found. Following a detailed analysis of the consumption points, the pipe system and the 3 meters/counting points carried out in April 2022, it is likely that one of the 3 meters is counting and billing quantities of water that have not been consumed by the SDK/OSL.

Rainwater consumption in 2023 was calculated at 712 m^3 (previous year 657 m^3). Rainwater was used for tank cleaning, vehicle cleaning and watering the green areas.

Drinking water

Drinking water is drawn from the water supply using the Inowatio system.

Waste water

All waste water from the reverse production processes (in particular the cleaning of buckets used to collect kitchen oils/fats), as well as from the storage areas for containers with oil-contaminated products and the washing area for the external cleaning of containers, is channelled through coalescence or grease separators and checked before being discharged into the public sewerage system. The volume is not measured. The volume of waste water is roughly equivalent to the water consumption. There is no direct discharge of rainwater/surface water into receiving waters.

Impact

The use of rainwater on the one hand and the use of coalescence or grease separators on the other minimise the impact on the environment.

Rainwater supply[1)]

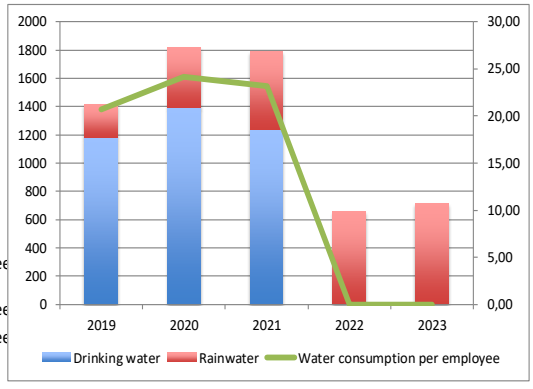
Drinking water from the water pipe

1) The rainwater saving is shown by a separate water meter.

Water consumption

	2019	2020	2021	2022	2023	
Adjusted* number of employees	68,31	75,37	77,24	74,36	71,96	
	2019	2020	2021	2022	2023	
Total water consumption	1414	1819	1787	unk.	unk.	in m^3
Drinking water	1179	1393	1234	unk.	unk.	in m^3
Rainwater	235	426	553	657	712	in m^3
	2019	2020	2021	2022	2023	
Water consumption per employee	20,70	24,13	23,14	unk.	unk.	in m^3 per employee
Drinking water consumption per employee	17,26	18,48	15,98	unk.	unk.	in m^3 per employee
Rainwater consumption per employee	3,44	5,65	7,16	8,84	9,89	in m^3 per employee

* Full-time equivalents



5.1 Direct environmental aspects

▶ Biodiversity and land use

Green areas

Native plant species have been used in the planting of the green areas. The green area between hall 1 and the Colmar-Berg residential area was planted with native, high-stemmed fruit trees. Diseased trees were replaced in 2019 and an insect-friendly flower meadow was also sown in 2019 as part of the national "no pesticides" campaign.

The green areas around the administration building, planted in 2006, were recultivated and partially replanted when the building was extended. In 2019, two pine trees were felled for road safety reasons and replaced with native trees.

Nesting aids and an insect hotel were installed to improve biodiversity. A compost heap also contributes to biodiversity.

In 2020, another large insect hotel was built next to the residential area at the flower meadow.

Land use

The administration building was extended in 2014. The sealed container storage area was built over and no other area was sealed. The building was constructed according to specifications, using environmentally friendly materials, and the building was optimised in terms of energy and energy technology (e.g. through the use of LED lighting).

Pesticides

The **SuperDrecksKëscht® campaign** is a member of the "Ouni Pestiziden" (without pesticides) platform. Apart from a few justified exceptions, no pesticides are used in the open air and against animal pests.

Impact

Apart from the sealing of the area, there is no negative impact on the soil. The measures mentioned (flower meadow, nesting aids, insect hotel, fruit trees) make a positive contribution to local biodiversity.

The surface area used in the reporting period remained unchanged from 2014 at 21,840 m², of which 17,940 m² is sealed and 3,900 m² are green areas.

High-stemmed fruit tree

Insect hotel and bird feeder

Administration building extension

Large insect hotel and flower meadow

5.1 Direct environmental aspects

▶ Emissions

The emission measurements on 10 November 2022 to monitor compliance with the OEL values (emissions in the air at the workplace) were carried out by Luxcontrol ("organisme agréé"). The permitted limits were not exceeded in any of the work areas. As measurements must be carried out every 64 weeks, no measurements were carried out in 2023.

Emission measurements in the exhaust air (dust, heavy metals and VOCs) were also carried out on 10 November 2022. The values were all well below the respective specific limit values. There were also no measurements in 2023.

Sorting and transfer station with filter system and continuous emission monitoring

Washing area with oil and grease separator

Heating system

The exhaust gases from the heating system are checked regularly by an authorised specialist company (heating installer).

Transport

The figures for the CO_2 calculation for trucks are based on the DLSV guidelines. Until 2022, the value of 2.67 kg CO_2 equ/l diesel fuel was also used for vans and cars. From 2023 they are based on the DIN EN ISO 14083:2023 standard (3.17 CO_2 equ/kg = 2.67 kg CO_2 equ/l). The figures for nitrogen oxides and particulates are the maximum values from the European emission standards.

Impact

Neither the measurements carried out as part of the operating permit for the protection of health in the workplace, nor the measurement of exhaust air emissions give rise to any action. Toxic substances (heavy metals, etc.) emitted after exhaust air filtration are well below the limit values. The heating system produces low CO emissions and the use of renewable energy sources does not generate any CO_2 emissions.

Details can be found in the Environmental Management Officer's report. Please also refer to the separate Climate Protection report (following pages).

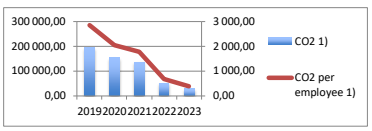
Transport-related emissions

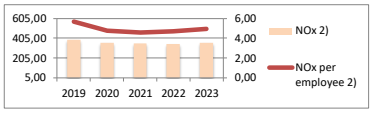
	2019	2020	2021	2022	2023	
Number of employees, full-time equ	68,31	75,37	77,24	74,36	71,96	
	2019	2020	2021	2022	2023	
CO_2 [1]	194 388,28	152 878,11	136 359,97	49 370,47	27 107,66	in kg
NOx [2]	387,41	356,84	352,41	347,66	355,07	in kg
Fine particles [2]	11,56	10,23	9,97	9,92	10,24	in kg
	2019	2020	2021	2022	2023	
CO_2 per employee [1]	2 845,87	2 028,37	1 765,41	663,94	376,70	in kg per employe ·
NO_x per employee [2]	5,67	4,73	4,56	4,68	4,93	in kg per employe ·
Fine particles per employee [2]	0,17	0,14	0,13	0,13	0,14	in kg per employe ·

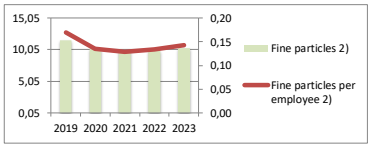
[1] 2019-2021 only $C0_2$ emissions caused by fossil fuels. Transport services using biodiesel and electricity are not counted. Since 2022: according to the ecobalance for biodiesel from used cooking fats, a value of 0,004539 kgC02e/l is taken into account for biodiesel. Electricity is still not taken into account.

[2] Only emissions from fuels are shown here. Transport using electricity since 2017 is not taken into account.

total kg kg per employee







The calculation method was changed in 2021 and the data was recalculated from 2017. Data from previous years' environmental statements are therefore not comparable.
Database for the new CO2equ calculation: according to consumption in the DLSV guide Calculation of GHG emissions (Tank to Wheel) Version 2013-03
new : 2023 value of table K.1 - DIN EN ISO 14083:2023 Quantification and reporting of greenhouse gas emissions from transport
Database Nitrogen oxides and fine particles New: based on fuel consumption in kWh/l - maximum values based on Euro 6 standard

5.1 Direct environmental aspects - emissions

Preliminary CO_2 balance sheet according to the GHG Protocol

In 2020, the **SDK** drew up its first CO_2 balance sheet based on the international Greenhouse Gas Protocol (GHG) standard by identifying and quantifying direct and indirect greenhouse gas emissions to the extent possible. A Climate Council has been in place since 2021.

The balance sheet mainly covers the emissions caused by the operator of the **SuperDrecksKëscht® campaign** at the site, as well as emissions from upstream and downstream processes. Details can be found in the detailed climate protection report, which is constantly updated and also contains the objectives and planned prevention measures.

Scope 1 – direct emissions

Total direct emissions in 2023:

➔ Transport: 27.1 tons of CO_2 equivalents from vehicles (trucks, vans, cars). This compares with 194.4 tons of CO_2 equivalents in 2019 (a reduction of more than 86%). This is due to the sharp increase in the use of biodiesel and electric vehicles.

➔ Heating: the direct use of collected used cooking oil and biodiesel in the central heating system avoided a total of 137.34 tons of CO_2 equivalents that would have been produced if fossil heating oil had been used.

➔ Machines: these are high pressure cleaners, roller packers (compactors) and sweepers. The existing gas-powered forklift has already been replaced by an electric forklift in 2021. Various measures (replacement of fossil diesel with biodiesel, new second-hand gas sweeper using gas from collected gas bottles, etc.) have reduced emissions to 12.9 tons of CO_2 equivalents.

If the emissions resulting from the use of used cooking oil and biodiesel for heating were to be offset, the consumption of the vehicle fleet and machinery would be significantly reduced.

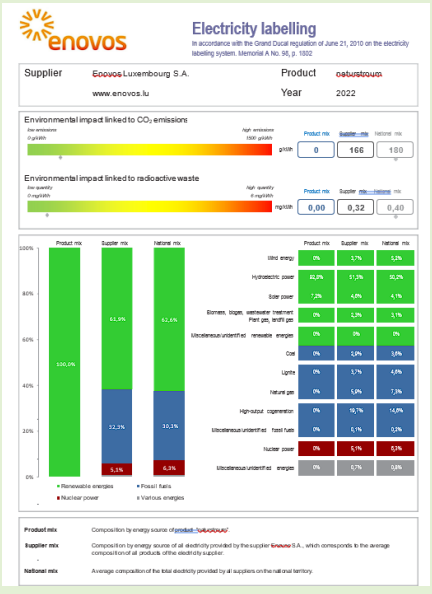
Scope 2 – indirect emissions

Indirect emissions were:

➔ Electricity on-site: as mentioned above, this is natural electricity purchased from enovos. The electricity label for this product, in accordance with the Grand-Ducal Regulation of 21 June 2010, indicates 0 kg CO_2 equivalent.

➔ Electricity production: in 2023, 176,241 MWh more electricity will be produced than consumed. The CO_2 savings due to the use of natural electricity and the production of green electricity totalled 143.20 tons of CO_2 equivalents compared to the national electricity mix.

➔ Electric vehicles: these are charged on site, through the national Chargy system and through private charging. In general, the use of electric vehicles is also reported as 0 kg CO_2 equivalents, as a very high proportion of these vehicles are powered by green electricity.



Electricity mix from nova-Naturstrom 2022

5.1 Direct environmental aspects - emissions

Scope 3 – indirect emissions

Data on scope 3 emissions was recorded in full for the first time in 2023 for the 2022 reporting year. As not all scope 3 calculations for 2023 are yet available, data for 2022 is also provided below. The full detailed climate protection report for the 2022 reporting year is available on the **SDK** website.

Scope 3a – indirect emissions from upstream activities

➔ **3.1 Purchased goods and services** (logistics containers, office supplies, etc.). Purchases are made in accordance with the supplier and product guidelines described on page 14 (point B.6). A total of 169.2 tons of CO_2 equivalents has been calculated for 2022.

➔ **3.2 Capital goods**
Purchases are made in accordance with the supplier and product guidelines described on page 14 (point B.6).
Photovoltaic system: the upstream chain, production and installation of the PV system purchased in *2022* generated 582.5 tons of CO_2 equivalents.
Renault Zoe: the upstream chain, production and downstream chain of 29 vehicles purchased in *2022* generated 727.9 tons of CO_2 equivalents.
SAP collection containers (counted as capital goods): the upstream chain, production and downstream chain account for 36.3 tons of CO_2 equivalents
In *2022*, a total of 1,559.7 tons of CO_2 equivalents was calculated.

3.3 Upstream chain of fossil fuels used in *2022*, a total of 83.97 tons of CO_2 equivalents has been calculated.

➔ **3.4 Upstream transportation and distribution**
This refers to the processing of waste in Luxembourg by partners and the transport of waste products from the logistics centre to the product recipient. A total of 174.19 tons of CO_2 equivalents has been calculated for *2022.*

Scope 3b – indirect site-related emissions

➔ **3.5A** Internal waste: the management of self-produced waste is based on the **SDK fir Betriber** concept and is prevention-orientated. The calculation of the waste generated in *2023*, including waste from reverse production, results in a quantity of 142.36 tons of CO_2 equivalents [1).]

➔ **3.5B** Collected and treated waste: the resource potential concept favours sustainable and resource-oriented treatment and recycling processes. Based on ZWS Carbon Metric Factors data, a saving of 416.9 tons of CO_2 equivalents was calculated for *2023*.

➔ **3.6** Business travel: business trips abroad that are not made with company cars are rare. In total, business travel (flights, train journeys) by 9 employees in *2023* resulted in emissions of just 1.1 tons of CO_2 equivalents.

➔ **3.7** Employee commuting: in the autumn of 2022, all employees who had been with the company for two years or more and did not yet have a company car were provided with electric vehicles, which are mainly charged on site with electricity produced by the company. This "leaves" only 36.47 tons of CO_2 equivalents.

Scope 3c – indirect emissions from downstream activities

Only category 9 is relevant here.

➔ **3.9** Downstream transportation and distribution
This takes into account the travel of participants to training and meetings, as well as employees working for Ligue HMC. A value of 32.99 tons of CO_2 equivalents has been calculated for 2023.

In general, climate protection is at the heart of all **SDK** activities under the slogan "Geliefte Klimaschutz" (climate protection in action).

1) Calculation basis: ZWS Carbon Metric Factors 2020 (Zero Waste Scotland)

5.1 Direct environmental aspects

▶ Waste products

In 2023, 70,687.8 kg of waste was generated (compared to 41,212 tons in the previous year), including waste from reverse production. The main reason for this is the disposal of decommissioned used cooking oil containers (8,598 tons) and collection boxes (6,283 tons; not reported separately before), which account for the increase in the waste from reverse production.

Furthermore, the volume of separator contents and green waste is far higher than the previous year. A particularly large amount was cut back in 2023 when maintaining green spaces. All of the waste categories mentioned, as well as the processing of old stock, are non-cyclical. A year-on-year comparison does therefore not make sense.

Waste from offices/administration amounted to 4,379 kg in 2023, which is about the same as in previous years. Annual comparisons make more sense here. The non-recyclable residual waste included in this figure was 1,103.5 kg, or 25.2%. It also included 2,769.9 kg of valuable products (63.2%) and 505.9 kg of problematic products (11.6%).

Internal waste collection station

Impact

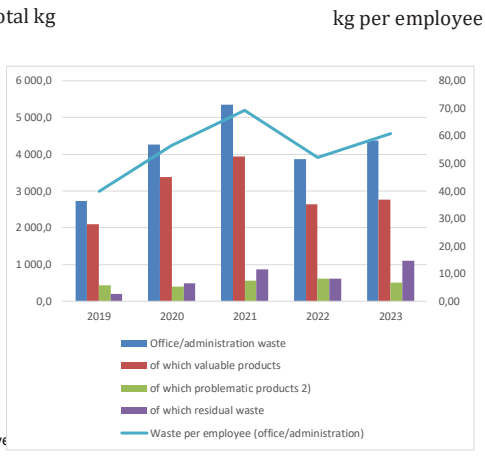
The amount of recyclable and problematic products from the office and logistics centre is low overall, as the **SuperDrecksKëscht® fir Betriber** concept not only separates waste to a large extent, but also implements prevention measures. Internal waste management has been awarded the ISO 14024-certified **SDK fir Betriber** label.

As part of the resource potential, the **SDK** checks the reverse production processes at the product recipient. Inspection and certification are carried out in accordance with the ISO 14024 standard, with the aim of maximising the proportion of material recycling (reuse of raw materials - circular economy). Of course, this also applies to internal waste products.

	2019	2020	2021	2022	2023	
Adjusted* number of employees	68,31	75,37	77,24	74,36	71,96	
Total waste	9 890,8	11 230,5	15 268,3	41 211,6	70 687,8	in kg
Reverse production waste	unlisted	unlisted	unlisted	12 751,8	24 020,9	in kg
Oil and grease separator contents/sludge[1) 2)]	4 600,0	2 700,0	8 442,0	14 472,0	32 358,0	in kg
Old stocks/archive/special treatments[3)]	1 854,0	3 639,5	1 173,0	9 845,9	2 229,9	in kg
Excavated earth/construction waste/greer	716,0	624,0	300,0	270,0	7 700,0	in kg

	2019	2020	2021	2022	2023	
Office/administration waste	2 720,8	4 267,0	5 353,3	3 871,9	4 379,0	in kg
of which valuable products	2 100,9	3 375,8	3 932,9	2 645,0	2 769,6	in kg
of which problematic products [2)]	427,9	400,3	551,4	619,4	505,9	in kg
of which residual waste	192,0	490,9	869,0	607,5	1 103,5	in kg

	2019	2020	2021	2022	2023	
Waste per employee (office/administration)	39,83	56,61	69,31	52,07	60,85	in kg per employe



5.1 Direct environmental aspects

▶ Traffic/transport

Vehicles and mobility

The goal of equipping the entire fleet with fuel-efficient vehicles is gradually being put into practice. Since 2017, 56 electric vehicles are in use. Where EVs are not yet possible due to insufficient range (trucks, vans), the latest emission control technology (Euro 6d-temp) is used.

The number of kilometres travelled in 2023 was 1,813,313, which is significantly higher than the figure for 2022 of 1,295,928 kilometres (+39.9%). In addition to the normalisation of the COVID pandemic, which was still noticeable in 2021, this is also due to the fact that increased employee commuting is included here. This is due to the sharp increase in the number of cars (+54.5%) as a result of the provision of company cars for commuting. However, the use of the company's own renewable electricity (PV system) to charge the cars and the reduction in the use of fossil fuels by employees (who previously mostly travelled to and from work in combustion engine cars) has had a significant positive impact on the CO_2 balance sheet.

Fuels / energy

Due to the high number of company cars, consumption increased to 1,300,209 kWh. Of this, 751,812 kWh (57.9%) came from trucks, 132,602 kWh (10.2%) from infomobiles and door-to-door collection vehicles and 415,795 kWh (31.9%) from cars. The share of fossil fuels was only 7.58% in 2023. 78.25% was covered by biodiesel. At 184,251 kWh, the share of electricity from electric vehicles (mainly green electricity) was 14.17% (compared to 8.5% in the previous year).

The average fuel consumption of the trucks was 471.19 kWh/100 km (approx. 52.35 litres), that of the infomobiles and door-to-door collection vehicles 107.95 kWh/100 km (approx. 11.89 litres). The fuel consumption of the cars was 27.18 kWh/100 km. These figures are in line with the previous year.

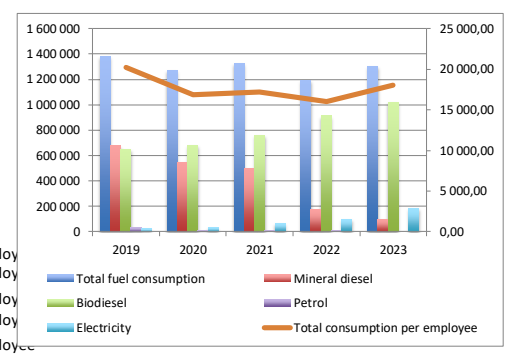
Use of biodiesel

Fuelling station with waste collection station

E-vehicles at the charging stations

Energy consumption - mobility (in kWh)

	2019	2020	2021	2022	2023	
Adjusted* number of employees	68,31	75,37	77,24	74,36	71,96	
	2019	2020	2021	2022	2023	
Total fuel consumption	1 380 149	1 273 506	1 326 077	1 192 979	1 300 209	in kWh
Mineral diesel	674 858	546 616	495 343	175 994	98 591	in kWh
Biodiesel	648 151	681 080	760 395	913 265	1 017 367	in kWh
Petrol	33 563	12 343	4 113	2 861	0	in kWh
Electricity	23 577	33 467	66 226	100 858	184 251	in kWh
	2019	2020	2021	2022	2023	
Total consumption per employee	20 205,59	16 896,73	17 168,27	16 043,28	18 068,50	in kWh per employ
Diesel consumption per employee	9 880,03	7 252,43	6 413,03	2 366,78	1 370,08	in kWh per employ
Biodiesel consumption per employee	9 489,03	9 036,49	9 844,58	12 281,67	14 137,95	in kWh per employ
Petrol consumption per employee	491,37	163,76	53,25	38,48	0,00	in kWh per employ
Electricity consumption per employee	345,17	444,04	857,41	1 356,35	2 560,47	in kWh per employee



5.1 Direct environmental aspects

▶ Paper consumption

Paper consumption can be estimated on the basis of the quantities purchased, although it is not possible to define precise annual quantities. Quantities therefore fluctuate, despite increasing digitisation.

▶ Hazardous substances

Most of the waste products handled by the **SuperDrecksKëscht® campaign** are hazardous substances and are mainly subject to the legislation on dangerous goods (ADR legislation). Accordingly, the vehicles used for the collection are equipped in accordance with ADR standards.

The logistics centre for the temporary storage and processing of the collected products is equipped in accordance with the legal requirements. This includes occupational health and safety and fire safety precautions. It also includes appropriate training for employees.

▶ Noise

The site of the **SuperDrecksKëscht® campaign** does not emit any noise that exceeds the legal limits.

▶ Traffic volume

The volume of traffic to and from the logistics centre by own and third-party vehicles (suppliers, deliverers) is low and does not cause any exceptional nuisance to the neighbourhood.

Impact

The storage of problematic products does not have a negative impact on the neighbourhood. Noise and traffic do not cause exceptional nuisance to the neighbourhood.

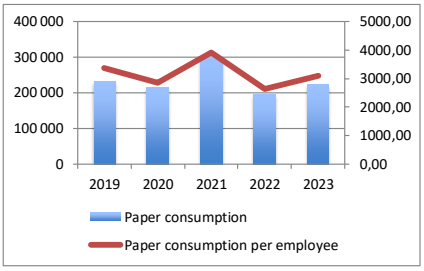
Paper consumption

	2019	2020	2021	2022	2023	
Adjusted* number of employees	68,31	75,37	77,24	74,36	71,96	
Paper consumption (annual purchase, conversion to A4)	231 000	215 000	301 500	195 500	223 000	sheet
Paper consumption per employee	3381,88	2852,59	3903,42	2629,10	3098,94	sheet per employee

Average 2017-2021 233 200,00 sheets

* Full-time equivalents

total A4 sheets A4 sheets per employee



5.1 Direct environmental aspects

Contingency planning for operational incidents

As part of the activities of the **SuperDrecksKëscht® campaign** described in chapter 2, in particular with regard to the conditioning and treatment of problematic waste products, a safety management system is in place that focuses in particular on preventive fire protection and emergency measures. There is an emergency folder containing all essential information on the alarm system and other information relevant to emergencies.

The hazard detection system is the central instrument in which all information from the leakage and explosion sensors, the fire alarm system and the operating status of the main safety equipment is collected. On the one hand, the messages accumulated in the hazard detection system are transmitted via SMS to the smartphones of the emergency call centre, the warehouse coordinator, the plant security and the safety officer. On the other hand, the messages are displayed on PCs in the reception, administration, warehouse coordinator's office and the technical room. In addition, the messages can also be displayed in an app available to the site security and emergency call centre.

In addition, regular maintenance and servicing is carried out, the regularity of which is monitored using a checklist. Of particular note are the following:

- The annual maintenance of the fire detection system was carried out on 25/10/2023. The hazard detection system was serviced on 14/11/2023.
- The annual maintenance of the smoke and heat extraction system was carried out on 09/08/2023
- EX sensor inspections on 26/04/2023 and 08/11/2023.
- Fire water system inspections on 12/04/2023 and 03/10/2023.
- Annual maintenance of fire extinguishers on 30/03/2023.
- Annual maintenance and repair of extinguishing water barriers 01 and 09 on 24/10/2023 and 25/10/2023.
- Inspection of first aid kits on 17/11/2023.
- Annual maintenance of VOC system sensors on 26/04/2023 and 08/11/2023.

All maintenance and servicing activities for 2023 are listed in the Safety Officer's report.

Evacuation and fire drills

Evacuation drills were carried out on an operational sector-specific basis as part of the operating instructions. Training was given on the practical use of small fire extinguishers.

An exercise with external intervention forces (CGDIS) was carried out on 16 December 2002.

Since the Colmar-Berg logistics centre started operations in 1990, there have been no incidents with significant environmental impact.

All incidents in 2023 are listed in the Safety Officer's report.

5.1 Direct environmental aspects

Environmental performance indicators – summary of key performance indicators

Environmental performance can be visualised using key indicators and is therefore comparable from year to year. In accordance with the requirements of the EMAS III Regulation, the key performance indicators are defined as follows:

Figure A - Total annual impact of direct environmental aspects

Figure B - The adjusted number of employees (full-time equivalents - conversion to 100%) has been used as a reference for environmental performance

Figure R - Indicates the ratio of A/B as a parameter for year-on-year comparisons

▶ Key performance indicators 2019 - 2023

Kernindikatoren		2019	2020	2021	2022	2023		
Zahl der Mitarbeiter (Vollzeitäquivalente)	B	68,31	75,37	77,24	74,36	71,96		
Papierverbrauch	A	231.000	215.000	301.500	195.500	223.000	Blatt	
Papierverbrauch pro Mitarbeiter	R	3.381,88	2.852,59	3.903,42	2.629,10	3.098,94	Blatt pro MA	
Wasser	A	1.414	1.819	1.787	n.b.	n.b.	in m^3	
Wasserverbrauch pro Mitarbeiter	R	20,70	24,13	23,14	n.b.	n.b.	in m^3 pro MA	
Trinkwasserverbrauch pro Mitarbeiter	R	17,26	18,48	15,98	n.b.	n.b.	in m^3 pro MA	
Regenwasserverbrauch pro Mitarbeiter	R	3,44	5,65	7,16	7,44	9,89	in m^3 pro MA	
Energieeffizienz								
Strom	A	254.794	254.887	290.012	300.308	399.758	in kWh	
Stromverbrauch pro Mitarbeiter	R	3.730,22	3.381,81	3.754,69	4.038,57	5.555,28	in kWh pro MA	Starke Zunahme wg. Elektromobilität
Heizung								
Gesamtverbrauch pro Mitarbeiter	R	541,93	521,85	685,84	653,73	771,15	in l pro MA	Seit 2016 werden für die Beheizung des Logistikzentrums ausschliesslich Kraftstoffe aus regenerativen Quellen genutzt
Speiseölverbrauch pro Mitarbeiter	R	497,85	326,39	320,29	453,63	633,62	in l pro MA	
Biodieselverbrauch pro Mitarbeiter	R	16,84	155,66	365,55	200,09	137,53	in l pro MA	
Heizölverbrauch pro Mitarbeiter	R	0,00	39,80	0,00	0,00	0,00	in l pro MA	
Mobilität								
Kraftstoff (Verkehr)	A	1.380.149	1.273.506	1.326.077	1.192.978	1.300.209	in kWh	
Gesamtverbrauch pro Mitarbeiter	R	20.206	16.897	17.168	16.043	18.069	in kWh pro MA	Der Anteil an Kraftstoff aus regenerativer Quelle (Biodiesel und Strom) betrug 2023 92,5 %.
Dieselverbrauch pro Mitarbeiter	R	9.880	7.252	6.413	2.367	1.370	in kWh pro MA	
Biodieselverbrauch pro Mitarbeiter	R	9.489	9.036	9.845	12.282	14.138	in kWh pro MA	
Benzinverbrauch pro Mitarbeiter	R	491	164	53	38	0	in kWh pro MA	
Stromverbrauch für Mobilität pro Mitarbeiter	R	345	444	857	1.356	2.560	in kWh pro MA	In Gesamtstromverbrauch enthalten.
Stromproduktion								
pro Mitarbeiter	R	0,00	0,00	0,00	128,60	8.004,43	in kWh pro MA	Die Produktion startete am 30.11.2022
Emissionen aus Verkehr								
CO_2 pro Mitarbeiter	R	2.845,87	2.028,37	1.765,41	663,94	376,70	in kg pro MA	CO_2: hier sind nur die durch fossile Treibstoffe verusachten CO_2-Emissionen angegeben. Die Verkehrsleistung, bei der
NO_x pro Mitarbeiter	R	5,67	4,73	4,56	4,68	4,93	in kg pro MA	
Feinstaub pro Mitarbeiter	R	0,17	0,14	0,13	0,13	0,14	in kg pro MA	
Abfall Gesamt	A	9.891	11.231	15.268	41.212	70.688	in kg	Die Zahlen 2019-2021 und 2022-2023 sind nicht vergleichbar. In der Gesamtsumme ab 2022 ist der Abfall aus der Rückproduktion dabei, dieser wurde in den Vorjahren nur unvollständig berücksichtigt.
davon Öle/Fette/Abscheiderinhalte	A	4.600	2.700	8.442	14.472	32.358	in kg	
davon problematische Abfälle aus Büro/Verwaltung	A	428	400	551	619	506	in kg	
davon sonstiger Abfall aus Büro/Verwaltung	A	2.293	3.867	4.802	3.253	4.379	in kg	
Abfälle aus Büro/Verwaltung - Gesamt pro Mitarbeiter	R	39,83	56,61	69,31	52,97	60,85	in kg pro MA	
Flächenverbrauch	A	21.840	21.840	21.840	21.840	21.840	m^2	
Flächenverbrauch pro Mitarbeiter	R	319,74	289,77	282,76	293,71	303,50	m^2 pro MA	

As stated in the environmental policy, the aim of the environmental management system is to reduce the environmental impact of direct environmental aspects.

5.2 Indirect environmental aspects

The indirect environmental impact of the activities of the **SuperDrecksKëscht® campaign** are presented and assessed using criteria catalogues and checklists. Similar products and services are grouped together.

The analysis takes into account the potential impact of the product, its ingredients and packaging. In the case of services, the direct and indirect environmental impacts are analysed as far as possible. This includes:

- the environmental impact of working with suppliers and service providers in administration and consultancy
- the environmental impact of the reception/collection of products
- the environmental impact of product transport
- the environmental impact of product storage
- the environmental impact of processing / recycling products

In the case of partners and product recipients, the criteria for cooperation are set out in contracts. Partners and product recipients are assessed according to criteria that include indirect environmental impacts.

Since the end of 2015, the ISO 14024-certified resource potential certification tool has been used for product recipients. This primarily assesses recycling output streams with a view to maximising the proportion of secondary raw materials generated.

The resource potential assessment generates metrics that allow the "resource performance" of product recipients to be assessed and the best performer to be selected from among alternatives.

Potential indirect environmental impacts are analysed and assessed as early as the selection of partners and product recipients.

As part of the Shop Green campaign, important indirect environmental aspects of administration and consultancy activities are analysed and evaluated. Naturally, this primarily concerns the product groups concerned.

The activities of the training department reduce relevant indirect environmental impacts for partners. This applies in particular to training courses on ecological washing and cleaning. Unfortunately, it is not possible to quantify the positive effects.

The main objective of the **SuperDrecksKëscht® campaign** is to make citizens and companies aware of ecological and waste-reducing consumption. The reduction of indirect environmental impacts is therefore a key objective.

▶ Packaging / consumables

The **SDK**'s environmental policy focuses not only on the analysis, presentation and evaluation of packaging materials, but also on their prevention. All packaging is reused as much as possible. This includes cardboard boxes and plastic containers. For example: the plastic buckets frequently used by **SDK fir Bierger** to collect used cooking fats and oils are washed in the company's own cleaning station and returned to the collection points for distribution to citizens/households (more than fivefold circulation).

Similarly, contaminated plastic drums emptied during the refilling/conditioning process are cleaned by an external service provider and reused by the **SuperDrecksKëscht® campaign**.

▶ Suppliers and service providers

The basic requirement for cooperation with suppliers is the award of the **SDK** label or at least membership of the **SDK fir Betriber**. This ensures that at least the criteria for ecological waste management are implemented by all partners.

If products or services cannot be obtained from the above-mentioned suppliers, preference will be given to those with environmental/sustainability certification. It goes without saying that suppliers should be located close to the site.

▶ Product recipients

As described above, product recipients are checked according to criteria that include indirect environmental impacts. The basic requirement is that all legally required permits are valid.

The principle of proximity is also an important factor for product recipients. The existence of environmental/sustainability certifications such as EMAS, ISO 14001, ISO 9001, ISO 50001 or specialised waste management companies is also taken into account.

▶ Transporters

As described above, transporters and partners for disposal are also assessed according to criteria that include direct environmental impacts. The basic prerequisite is the existence of all legally required permits and environmental/sustainability certifications.

▶ Information for employees and customers

Articles on sustainability topics are regularly communicated via the internal email distribution list. In addition, all employees are regularly informed about environmental issues through training programmes.

As mentioned above, the main task of the **SuperDrecksKëscht® campaign** is to inform and raise awareness among customers, i.e. private households, companies and institutions. This is achieved through a range of instruments such as print media, radio, internet, training courses, exhibitions and animations for children.

An important partner is the Consumer Protection Association (**ULC**).

The information and awareness-raising activities are not limited to waste prevention issues, but regularly go beyond them to include other issues related to environmentally friendly and sustainable consumption.

5.3 Management – key performance indicators

The annual report/sustainability report published each year contains further information on the activities of the **SuperDrecksKëscht® campaign**. It includes a series of management indicators related to indirect environmental performance. These include (see extract on the following pages 33 and 34):

➔ Quantities of problematic products collected from private households

➔ Number of consultancy activities carried out by telephone and e-mail for citizens and companies/institutions

➔ Number of companies/institutions advised and audited on waste management

➔ Number of partners and product recipients audited on legal compliance and environmental performance

➔ Number of internal and external training courses, topics and number of participants

➔ Number of visitors (guided tours) to the logistics centre

➔ Number of information stands/exhibitions etc. to inform the public and the business community

and other management performance indicators related to the **SDK**'s innovation projects, such as the number of participants in the ECOBOX project and the number of ECOBOXes distributed to reduce food waste.

Environmental status indicators are also included.

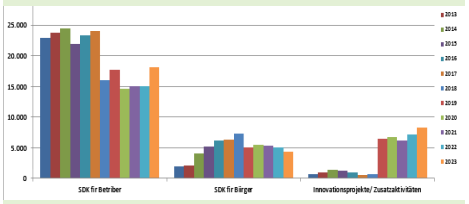
Both environmental management indicators and environmental status indicators are based on the requirements of ISO 14031.

The annual report is distributed to stakeholder representatives and other interested parties on request in the first half of the following year. In addition to the German version, a French and an English version are also available on the website www.sdk.lu. The annual report/sustainability report is based on the requirements of the Global Reporting Initiative (GRI).

5.3 Management - key performance indicators (excerpt from the SDK sustainability report)

▶ Advice for citizens and companies/institutions

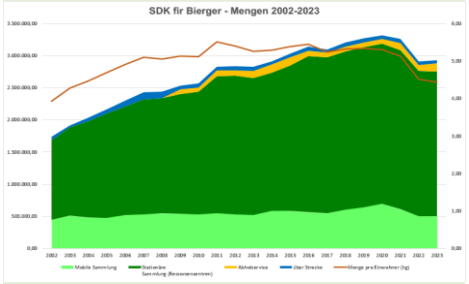
The number of contacts by e-mail or telephone in 2023 is at the same level as in the previous year. Of the 30,755 customer contacts, 18,121 were related to **SDK fir Betriber**, 4,331 to **SDK fir Bierger** and 8,303 to extra activities.



Advice by phone and e-mail 2012-2023

▶ Quantities of problematic products collected from citizens

The total amount of the **SDK fir Bierger** collected in 2023 was 2,934.9 tons. This represents a slight increase of 0.8% compared to 2022. During the same period, the population increased by approximately 2.4% to 660,800 people. The recorded quantity of problematic products per year and per inhabitant has therefore continued to decrease and amounts to 4.44 kg. This is a positive development, which is also confirmed by the results of the national residual waste analysis.



Recorded quantities of problematic products from private households 2002 – 2023

▶ Waste products treated at the logistics centre

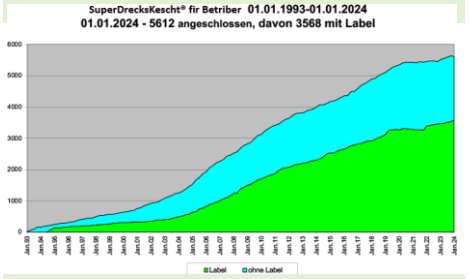
In 2023, the logistics centre received 4,415.7 tons of valuable and problematic products. In 2022, the figure was 4,425.7 tons, only slightly more. In 2023, 4,354.2 tons were transported from the logistics centre to the product recipients. In 2022, the figure was 4,412.4 tons, 1.3% less than the previous year.

▶ Quality assurance by the SDK laboratory

The number of samples of "products" and "unknown products" was the same as in previous years, with a total of 1,965 samples. The number of indoor air/radioactivity and special batch analyses was also in line with the previous year at 9,377.

▶ Concepts for companies/institutions

As of 31 December 2002, 5,612 institutions/companies were affiliated. Among other things, 2,169 analyses and concepts were prepared and 2,308 label audits were carried out. A total of 7,126 visits were made to companies/institutions. These included 264 initial consultations and 32 training sessions. The number of labelled companies/institutions as of 31 December 2008 was 3,568, which represents a share of 63.6% (previous year 62.8%). The number of people employed by affiliated organisations on 31 December 2023 was 295,286.



Affiliated and labelled companies in 2023

▶ Audits of partners and product recipients

During 2023, 43 meetings were held with product recipients. The resource potential tool was also used here (see point 2 - Advice/Sales). In addition, 19 meetings were held with product recipients or partners at the Colmar-Berg site, including online conferences. The calculation of resource potential according to the **SDK** concept was updated for most product streams.

In 2023, of the 14 partners who signed the updated 2022 agreement, 9 were awarded the **SDK** quality label, of which 7 were awarded the diploma (label for 5 years or more).

5.3 Management - key performance indicators (excerpt from the SDK sustainability report)

▶ SDK fir Bierger and extra activities

Shop Green

The "Clever akafen" (buy smart) campaign was renamed "Shop Green" in 2022. The reason for this was the wish of the retail partners to emphasise that the campaign is about promoting environmentally friendly products. The national campaign, which has been recognised by the EU Commission, promotes environmentally friendly and low-waste products in retail with the "Shop Green" label. The number of participating shops was 194 on 31 December 2023.

Clever Iessen

The campaign promotes reusable containers to take away food from restaurants, canteens and takeaways and was launched in June 2018. It continued to develop positively in 2023. By 31 December 2023, 143 restaurants and 158 canteens/school cafeterias were affiliated. 27,907 500 ml containers and 82,188 1000 ml containers, i.e. over 110,000 units, had been distributed by this date.

Resource potential

The concept enables the recycling and disposal processes (reverse production processes) at the waste recipient (product recipient) to be checked and evaluated for resource efficiency. By 31 December 2023, a total of 132 reverse production processes had been certified for 47 partners of the **SuperDrecksKëscht® campaign** and other stakeholders.

Ecological waste management in residential buildings

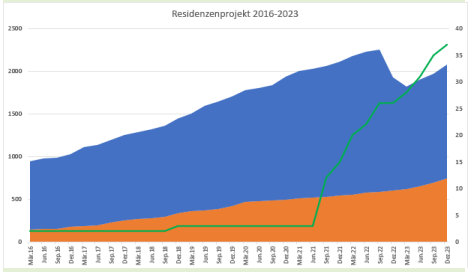
By 31 December 2023, a total of 93 property management companies had signed up, with 6,005 residential buildings. Of these, 749 were equipped. The number of labelled residential buildings increased from 26 in the previous year to 37 in 2023.

Repair & Share

The overall aim of the online platform is to extend the lifespan of goods in the interests of resource efficiency and to reduce resource consumption through shared use. "Flécken a Léinen" was renamed "Repair & Share" in 2022. As of 31 December 2023, 122 companies offering repairs and 33 companies offering a rental service were registered.

▶ SDK Akademie

The **SDK Akademie** is an overarching tool for raising awareness, providing information and offering qualifications as part of the activities of the **SuperDrecksKëscht® campaign** (**SDK fir Bierger, SDK fir Betriber** and extra activities). The **SDK** participated in 20 events in 2023 as part of its efforts to raise awareness among citizens. A total of 171 internal training courses were held in 2023. More information can be found in the **SDK Akademie**'s annual report.



Residential buildings registered and equipped in 2023

6. Environmental programme – current and future projects 2023 - 2026

The environmental programme of the **SuperDrecksKëscht® campaign** is presented below. In line with the tasks set out in the national sustainability strategy, the objectives related to indirect environmental aspects predominate.

It is also difficult to quantify the environmental objectives related to direct environmental aspects. Additional objectives (1, 2 and 7) have been added in 2021 and 2022.

Direct environmental aspects

Objective	**1. Climate neutrality or positive CO_2 balance sheet by 2025**
Measures	Further development of the CO_2 balance sheet and climate protection report for scope 3. Preparation of a complete CO_2 balance sheet for scope 3 for 2022 and 2023.
Responsible e.	Management, **SDK** Climate Council
Due date	Ongoing; target: 31/12/2025
Status	Publication of 3 climate protection reports 2019-2021 with ongoing addition of scope 3 data. Complete climate protection report incl. scope 3 in 2022.
Evaluation	Positive development. The 2022 energy audit, the installation of a photovoltaic system and the purchase of additional electric vehicles mean that the target is likely to be achieved earlier than planned.

Objective	**2. Circular economy: close regional material cycles by working with local producers**
Measures	Promotion of **SDK** Circular products; target to introduce more **SDK** Circular products remains unchanged.
Responsible e.	Management, coordination of extra activities
Due date	Ongoing; target remains: at least 1 additional **SDK** Circular product by 31 December 2025
Status	**SDK** Circular label; ensuring legal compliance with authorities; management of existing **SDK** Circular products; another product was realised in 2023 with the Ecobloc. Continue to investigate which products could be considered.
Evaluation	**SDK** Circular is not the only tool to support the circular economy. In general, the **SDK** is keen to support all stakeholders who promote the circular economy.

Objective	**3. Optimise disposal logistics to reduce energy**
Measures	No specific new measures. Monitoring of current status.
Responsible e.	Management, coordination of collection logistics
Due date	Review by 31/12/2024
Status	The optimisation of route planning through GPS monitoring has been implemented using the Webfleet system.
Evaluation	The goal of optimising logistics has been largely achieved through the purchase of new low-emission vehicles (see below), high-capacity utilisation and the Webfleet system. This is also reflected in the reduction of kilometres driven in logistics, which fell by a further 7.3% between 2022 and 2023.

Direct environmental aspects

Objective	**4. Produce electricity**
Measures	Installation of a PV system completed. Commissioning (grid connection) on 30.11.2022.
Responsible e.	Management, innovation coordination
Due date	not applicable
Status	Electricity production is running. In 2023, the PV system produced 575.999 MWh of electricity, which corresponds to a saving of 103.68 tons of CO_2 equivalents.
Evaluation	Target successfully achieved.

Objective	**5. Reduce vehicle emissions (CO_2, nitrogen oxides, particulates) by 20% by 2023 compared to 2014**
Measures	2020/2021: increased use of public transport; purchase and replacement of existing vehicles. The number of kilometres travelled has been reduced thanks to an increase in working from home (partly due to COVID, but also due to improved work organisation, which was introduced at the end of 2019). Continuation of measures 2022 - 2024: further increase in the use of public transport; further replacement of fossil-fuelled vehicles with electric drives or climate-neutral fuels.
Responsible e.	Management, innovation coordination
Due date	Annual review as part of CO_2 balance sheet review
Status	In 2023, cars were also replaced by electric or other energy-efficient and low-emission vehicles. As part of the climate protection strategy, all employees who have been with the company for two years or more were offered a company e-vehicle in 2022. By expanding the charging infrastructure, the electricity produced by the PV system can be used directly to power the vehicles. At the end of 2023, there were 56 EVs in the fleet.
Evaluation	By 2023, CO_2 emissions were 67.3% lower than in 2014 and NOx emissions had fallen by 42.6%, while fine particulate emissions had fallen by only 9.6%. The objective has therefore been largely achieved.

Objective	**6. Reduce paper consumption by 40% per employee by 2023 compared to 2014 through digitisation**
Measures	Completed in 2020: expansion of the customer portal functions; purchase of additional tablets; introduction of a digital document management system for consultancy activities; replacement of newspapers and magazines with e-paper versions. Planned measures for 2022 and 2023: continuation of the digitisation measures. 2023: digital holiday application and management tool; expansion of the ELO tool to other areas.
Responsible e.	Management, IT coordination, coordination of consultancy activities
Due date	Review by 31 December 2024 at the latest
Status	Further digitisation measures are being implemented, e.g. extension of the ELO archiving tool to other services.
Evaluation	Objective not achieved. It has been established that further paper savings are hardly possible at present. This is more of a medium-term goal. New objective postponed to 2027.

6. Environmental programme – current and future projects 2023 - 2026

Direct environmental aspects

Objective	**7. Warehouse logistics: conversion of fossil-fuelled machinery to renewable sources (new2022)**
Measures	Measures in 2023: further optimisation, replacement of machines (electric high-pressure cleaners)
Responsible e.	Management, innovation coordination, reverse production coordination
Due date	Review by 31 December 2024 at the latest
Status	Measures have been implemented as far as possible.
Evaluation	Positive development. The fuel consumption figures for machines in 2023 show that the changeover has already been largely successful. Further improvements are currently not possible as they are not economically viable and do not make sense in terms of the CO_2 balance sheet.

Indirect environmental aspects

As stated in the environmental policy, the aim of the environmental management system is to reduce the environmental impact of direct environmental aspects. As far as indirect environmental aspects are concerned, quantification is not meaningful due to the data situation.

Objective	**1. Increase consumption of sustainable products (non-food sector) - Shop Green**
Measures	Ongoing adaptation/development of criteria; 2019: increased inclusion of packaging (sustainability, circular economy); update criteria; explore other possible product categories 2020: update criteria; start market analysis 2021: further development of the concept, market support and qualification of sales staff 2022: renaming of "Clever akafen" to "Shop Green". Reason: request from retail partners to emphasise more clearly that it is about promoting environmentally friendly products. 2023: Market support; inclusion of the “Leave on” product category in personal care products, development of an online tool to inform and raise awareness among retail staff. 2024: introduction of the “Leave On” product group; further intensive market support.
Partner	Retailers, suppliers, manufacturers, Confederation (of commerce), Union luxembourgeoise des consommateurs, ministries, EBL
Responsible e.	Management, coordination of consultancy and extra activities, coordination of communication
Due date	Review by 31 December 2024 at the latest
Status	Successful implementation of the change from “Clever akafen” to “Shop Green”. Further development with the existing tools, in particular the ongoing market analysis.
Evaluation	The market analyses were continued in 2023. The response to “Shop Green” continues to be positive from both retailers and consumers.

Indirect environmental aspects

Objective	**2. Welcome kit and information leaflet - information for citizens and new residents of municipalities to promote waste sorting and prevention**
Measures	Publicity via consultancy activities; placement of welcome kits in municipalities/syndicates 2021: carry out market analysis to determine current needs. Based on the results of the market analysis, the distribution of the welcome kits will be continued according to the wishes/needs of the municipalities. 2022-2023: the distribution of the welcome kits will be continued according to the wishes/needs of the municipalities. 2023 and 2024: distribution of the information leaflet for publication in the municipality's bulletin
Partner	Producer systems: Ecotrel, Ecobatterien, Valorlux, as well as the municipalities and communal syndicates
Responsible e.	Management, coordination of consultancy activities & innovation projects et communication coordinator
Due date	Review by 31 December 2025 at the latest
Status	The welcome kit was only used a few times in 2023. The information leaflet, on the other hand, is increasingly being used. 63 out of 102 municipalities show their interest by placing their municipal logo.
Evaluation	Other municipalities will not use the welcome kit. Instead, they will make greater use of other tools, such as the information leaflet for their bulletins.

Objective	**3. Integrate sustainability-related topics in schools**
Measures	2018: creation of concrete, practical documents in line with the curricula; testing in selected partner schools; topics: sustainable waste management, sustainable consumption, sustainable living in the community, … 2019: expansion to the national level; other projects: joint development and use of practical materials (media, films, stories, posters) on sustainable consumption; YouTube channel 2020: further development of digital offers (e.g. YouTube tutorials). 2021 – 2024: development and use of practical materials (media, films, stories, posters) on sustainable consumption is pursued.
Partner	Primary schools, secondary schools, Maison Relais
Responsible e.	Management, SDK Akademie coordination
Due date	Review by 31 December 2024 at the latest
Status	Projects are being implemented
Evaluation	Cooperation with the relevant institutions (SCRIPT, IFEN) has been established.

6. Environmental programme – current and future projects 2023 - 2026

Indirect environmental aspects

Objective	**4. Further develop national collection systems in the retail sector to improve the collection of recyclable and problematic products and reduce residual waste**
Measures	2018-2021: participation in the development of the national waste app to present all offers for the collection of waste products; installation of collection cabinets (e.g. Cactus, Auchan); further cooperation in the implementation of the national waste management plan with the aim of standardising the collection systems. Since 2022: cooperation in the implementation of the national waste management plan with the aim of further developing the collection systems in the retail sector will be continued.
Partner	Producer systems: Ecotrel, Ecobatterien, as well as the municipalities or communal syndicates, Luxembourg Confederation of commerce
Responsible e.	Management, coordination of consultancy activities and extra activities, coordination of communication
Due date	Review by 31 December 2024 at the latest
Status	The new version of the national legislation has been finalised. The **SDK** continues to support the Ministry of the Environment and the Environment Agency in the further development of collection systems, but is now explicitly limited to problematic products.
Evaluation	The **SDK** has now mainly a supportive role and is limited to problematic products.

Objective	**5. Further develop/replace input-based recovery rates by an output-based tool that represents realistic recovery of (secondary) raw materials (resource potential)**
Measures	2018-2021: promotion continued; campaign at EU level, national authorities; recruitment of additional partners for certification (both reverse production and production); review of resource potential for **SDK** consumables; review of resource potential for new products - including repairability Since 2022: measures from previous years are updated. Existing certifications have been updated or renewed. Placement at EU level will continue.
Partner	Product recipients, producers of goods and consumables
Responsible e.	Management, coordination of consultancy activities & extra activities, coordination of communication
Due date	Review by 31 December 2024 at the latest
Status	The resource potential is part of the **SDK Circular** products. Another approach is the cooperation with the RAL 950 quality label, but there has been no significant further development.
Evaluation	The dissemination of the resource potential - the certification of further reverse production processes - has unfortunately not been realised as desired. Only one product - Geobloc, see direct environmental aspects (2) - was certified.

Indirect environmental aspects

Objective	**6. Raise awareness of the circular economy among institutions and companies**
Measures	Ongoing: information for companies and institutions as part of the **SDK fir Betriber**; reference to the resource potential and further innovation projects as part of the waste management concept; active cooperation in partner projects Support for the House of Sustainability and the Fit 4 Sustainability and SME Packages programmes as part of the "Klimapakt fir Betriber" initiative.
Partner	House of Sustainability, Luxinnovation and Ecoinnovation Cluster; LIST, University of Luxembourg, Klimapakt municipalities
Responsible e.	Management, coordination of consultancy activities and extra activities
Due date	Review by 31 December 2024 at the latest
Status	Ongoing review of requirements. The circular economy will continue to be discussed in the institutions and companies. Information will be provided through partner projects.
Evaluation	Planned measures are being implemented. Sensitisation of companies through ongoing information on innovation projects. It is not possible to quantify and evaluate success.

Objective	**7. Further develop residential collection systems to improve collection of valuable and problematic products and reduce residual waste - Equip affiliated residential buildings with waste locks**
Measures	2018-2020: continuous advice and support for setting up collection points; support for setting up waste locks; development of a cost-effective model to increase the attractiveness of waste locks; campaign for further waste locks; 2021: intensive promotion of the label; new concept for awarding the label Since 2022: measures will be continued. Implementation of training courses for both property managers and residents, focusing on a "train-the-trainer" approach
Partner	Residential buildings, property management companies, GSPL (Association of Property Management Companies), municipalities; billing service providers
Responsible e.	Management, coordination of consultancy activities and extra activities, communication coordinator, project manager for residential buildings
Due date	Review by 31 December 2024 at the latest
Status	As a result of the new legislation, the demand for the **SDK**'s services has developed positively. The number of labelled residential buildings is now 37.
Evaluation	In 2023, the trend was also positive and in line with the objectives.

Objective	**8. Reduce food waste - design and use of reusable containers for catering and events (ECOBOX)**
Measures	Distribution of over 100,000 ECOBOXes by the end of 2022; coordination and testing of further reusable containers; cooperation with municipalities for the use of ECOBOXes at events and festivals. 2020/2021: further strengthening of the cooperation with municipalities, canteen operators and caterers; 2022: promotion of the "Partyrent" offer

Environmental programme – current and future projects 2023 - 2025

Indirect environmental aspects

... measures	Since 2023: general promotion of reusable containers in the catering sector. Support other suppliers in Luxembourg. Further promotion of the ECOBOX.
Partner	Ministry, IMS, Horesca, canteens, restaurants, clc, Chamber of Commerce, Chamber of Skilled Trades and Crafts
Responsible e.	Management, coordination of consultancy activities and extra activities, communication coordinator, project team "Clever Iessen"
Due date	Review by 31 December 2024 at the latest
Status	The measures are being implemented.
Evaluation	Positive development: more than 110,000 ECOBOXes distributed by 31 December 2023.

Objective	**9. Increase the number of people qualified by the training department; expand the training programme**
Measures	2018/2019: improvement of the department's management system; targeting of national actors in the professional and life-long training sector // 2020-2021: further diversification, expansion, implementation of the concept; increase in the number of offers in cooperation with national training institutions; further development of the management system and the software used. 2022: offers in cooperation with national training institutions; further development of the management system. 2023: ISO 21001 certification; development of an online tool/app to reach even more people. 2024: launch of the online tool/app
Partner	ADEM, municipalities, public institutions, schools
Responsible e.	Management, coordination of the SDK Akademie
Due date	Review by 31 December 2024 at the latest
Status	The measures are being implemented. En 2022, a new strategy paper was agreed with the Ministry of the Environment in order to better meet the requirements regarding the SDK Akademie.
Evaluation	The SDK Akademie programmes have been very well received. The number of participants is high.

Objective	**10. Saving resources through a sharing economy - Repair & Share project**
Measures	Ongoing: attract more businesses; promote craft businesses offering repairs; develop website with general information on repairs. 2020-2021: discussions with Repair Café and other stakeholders to further develop the offer; continued collaboration and networking with existing projects such as Social ReUse or Rethink. Carry out market analyses. As a result of the reorientation of the concept, the project was renamed "Repair & Share". The internet platform has been revised as planned. The project will continue to be promoted with the Chamber of Skilled Trades and Crafts in 2023 and 2024. The aim is to attract more participating companies.

Indirect environmental aspects

Partner	Ministries, Chamber of Skilled Trades and Crafts, Chamber of Commerce, Oekozenter Pafendall, Ecotrel, INDR, Repair-Café Luxembourg, Cell
Responsible e.	Management, coordination of consultancy activities and extra activities, coordination of communication, project team "Share & Repair"
Due date	Review by 31 December 2024 at the latest
Status	The conceptual revision was completed at the end of 2022. The promotion is currently being stepped up, although the number of registered companies has not increased significantly.
Evaluation	The project is strongly influenced by the framework conditions (EU and national legal framework). Positive development can only be expected in the medium term.

Objective	**11. Green Events: making events more environmentally friendly by avoiding and sorting waste**
Measures	2019: launch of the campaign in September; creation of a website; increased consultancy activities; awarding of the first "Green Events" and "Mir engagéieren eis" labels 2020/2021: measures were maintained; increased cooperation with municipalities; further awarding of "Green Events" and "Mir engagéieren eis" labels. 2022: measures were maintained. 2022, 2023, 2024: measures are maintained. Increased support for events; cooperation with municipalities; cooperation in the Green Business Events project. Publication of a brochure for municipalities.
Partner	Oekozenter Pafendall, ministries, municipalities
Responsible e.	Management, coordination of consultancy activities and extra activities, coordination of communication, project manager
Due date	Review by 31 December 2024 at the latest
Status	Measures are being implemented. Local authorities are more involved in the promotion and implementation, not least because of the legal framework.
Evaluation	The response is also increasingly positive due to the new legal framework. The project is progressing well.

Objective	**12. Integration and awareness-raising of refugees regarding the handling of waste products/resources**
Measures	Ongoing: continuous support for institutions; further improvement of collection; sensitising refugees to prevention; increased training since 2023 according to the "train-the-trainer" approach.
Partner	ONA (formerly OLAI)
Responsible e.	Management, training coordination, project team
Due date	Review by 31 December 2024 at the latest
Status	Continuous examination of requirements
Evaluation	Monitoring and training activities continued as planned in 2023. Quantitative data on effective prevention (currently) not possible.

6. Environmental programme – current and future projects 2023 - 2025

Indirect environmental aspects

Objective	**13. Continue to reduce the risk potential of problematic products in private households**
Measures	2018-2020: awareness campaigns on railway sleepers and treated wood, lithium batteries in collaboration with Ecobatterien, handling of medicines, aerosols, paints/varnishes. 2021: continuous monitoring of developments; continuation of the campaigns. In 2021, a particular focus was on fireworks/explosives and the hazard potential of high-energy (lithium) batteries. 2022, 2023, 2024: measures are maintained; continuous monitoring of developments.
Partner	Municipalities, Ecobatterien, health sector
Responsible e.	Management, coordination of consultancy activities and extra activities, **SDK fir Bierger**
Due date	Review by 31 December 2024 at the latest
Status	The measures are being implemented. In general, the topic was further promoted in 2023. Prevention effects are noticeable. However, new products "appeared" in 2023 that did not play a role in previous years and represent new potential hazards, in this case nitrous oxide containers.
Evaluation	The measures were implemented as planned.

Objective	**14. Practical implementation of the barter economy to reduce waste in schools (see also point 3.)**
Measures	2019 and 2020: installation of swap cabinets in secondary schools; accompanying information (rules of use) and awareness-raising; accompanying workshops; 2021: implementation by the **SDK Akademie**; accompanying information and awareness-raising; accompanying workshops; participation of the **SDK** in the "Nachhaltigkeitscheck in der Schule" (Sustainability Check in Schools) project.
Partner	Schools, ministries
Responsible e.	Management, coordination of the **SDK Akademie**
Due date	Project completed
Status	No further specific measures.
Evaluation	Project completed. The topic has been included in general education for sustainable development.

Objective	**15. Implement the circular economy in the construction sector: improve resource efficiency through better planning**
Measures	Ongoing information and awareness-raising; cooperation with architects; cooperation on a building material passport for subsequent demolition; application of the resource potential concept; development of instruments for the separate collection of waste products; 2018-2021: introduction and sales of the LECOBOX; 2022-2024: continuation of the measures.
Partner	Architects, LIST, university, construction industry, Administration des Bâtiments Publics, Training Institute of the Construction Industry (IFSB), other public property developers

Indirect environmental aspects

Responsible e.	Management, coordination of consultancy activities and extra activities, project team "construction"
Due date	Review by 31 December 2024 at the latest
Status	Medium-term planning. SNHMB (Société Nationale des Habitations à Bon Marché), a major public-sector property developer, has now included the **SDK fir Betriber** label in its tender criteria for the construction sector.
Evaluation	The importance of the **SDK**'s consultancy activities is also growing as a result of the new legal framework. A positive development.

Objective	**16. Further reduce contaminated sites in agriculture and viticulture**
Measures	Ongoing: advise agricultural and wine-growing businesses on joining the **SDK fir Betriber**; continue to track needs through cooperation with MBR and ASTA; until 2021: managing the processing and recycling of film and other plastics, as well as vineyard stakes and fruit tree stakes from agriculture
Partner	Ministry of Agriculture, MBR (Maschinenring), ASTA (Administration of Technical Agricultural Services)
Responsible e.	Coordination of consultancy activities and extra activities, project team "agriculture"
Due date	Project completed
Status	Ongoing review of requirements with the help of the partners MBR and ASTA. The **SDK** is available to provide advice as needed.
Evaluation	The expertise gained by the **SDK** in the collection of agricultural film and stakes is now being used by third parties. The project has been completed. The response to the advice provided to farms continues to be positive.

Objective	**17. Reduce problematic products still present in private residual waste (new objective 2019/2020; see also point 13)**
Measures	2020/2021: awareness-raising among citizens through public relations/advertising; measures were continued in particular for pharmaceuticals and cosmetics, aerosol cans and paints/varnishes; continuous monitoring of developments. 2023: based on the results of the residual waste analysis, the focus was on paints/varnishes, medicines, aerosol cans and new bituminous waste.
Partner	Municipalities, retailers, pharmacies
Responsible e.	Coordination of consultancy activities and extra activities, coordination of communication, project manager of the **SDK fir Bierger**
Due date	Review by 31 December 2024 at the latest
Status	Current volume balance sheets as a basis for information and awareness-raising campaigns
Evaluation	The analysis of residual waste in 2022 shows a significant decrease in problematic products in residual waste, which indicates increased awareness and prevention. The amount of problematic waste per year and per inhabitant has also decreased in 2023. The objective is therefore well on track.

With this environmental statement 2024, covering the year 2023, we want to inform our employees, customers and the interested public about the environmental protection at the **SuperDrecksKëscht® campaign**. We guarantee the truthfulness of the information contained in this environmental statement and release it for publication. The management/board of directors is responsible for the content and release of this environmental statement.

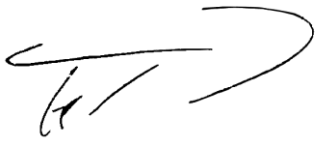
Furthermore, by signing this document, we reaffirm our commitment to comply with all legal and other binding obligations that affect us.

We also confirm our commitment to continuous improvement of our environmental performance and the management system required to achieve this.

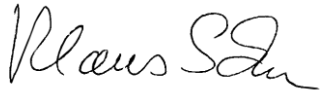
The management of the **SuperDrecksKëscht® campaign –** the operator **Oeko-Service Luxembourg S.A.**

Colmar-Berg, March 2024

Signatures



Hans-Peter Walter, Oeko-Service Luxembourg S.A. (operator)



Dr. Klaus Schu, Oeko-Service Luxembourg S.A. (operator)

Frank Fellens, Oeko-Service Luxembourg S.A. (operator)

The next updated environmental statement will be published in April 2025.
The next consolidated environmental statement will be published in April 2026.

Declaration of validity

The environmental verifiers listed below confirm that the site, as stated in this updated environmental statement of the organisation SDK SuperDrecksKëscht/ Oeko-Service Luxembourg SA, with the registration number LU-000005, meets all the requirements of Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009, as amended on 28 August 2017 and 19 December 2018, on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).

Name of the environmental verifier	Registration number	Authorised for the sectors (NACE)	
Christian Ruhe	DE-V-0386	38	Collection, treatment and disposal of waste
Markus Grob	DE-V-0363		
Dr. Georg Sulzer	DE-V-0041	70.22 85.59.2	Management consultancy activities Professional adult education

By signing this declaration, it is confirmed that:

- the verification and validation have been carried out in full compliance with the requirements of Regulation (EC) No 1221/2009 as amended by Commission Regulation (EU) 2017/1505 and (EU) 2018/2026,
- the result of the verification and validation confirms that there is no evidence of non-compliance with the applicable environmental legislation, and
- the data and information in the environmental statement provide a reliable, credible and truthful picture of all the organisation's activities.

This declaration is not the same as an EMAS registration. An EMAS registration can only be carried out by a Competent Body in accordance with Regulation (EC) No 1221/2009. This declaration shall not be used as an independent basis for informing the public.

Berlin, 10 July 2024

Christian Ruhe
Environmental verifier DE-V-0386

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Environmental verif. DE-V-0213
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D-12435 Berlin

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Markus Grob
Environmental verifier DE-V-0363

Dr. Georg Sulzer
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SDK RESSOURCEN INNOVATIOUN NOHALTEGKEET CIRCULAR ECONOMY

SuperDrecksKëscht®

Glossary and list of abbreviations

ADR	European Agreement concerning the International Carriage of Dangerous Goods by Road
a	annum (lat.) = year
CO	Carbon monoxide
CO_2	Carbon dioxide
DIN EN ISO 14001	Environmental management systems - requirements with guidance for use (internationally recognised standard)
ECOBOX	Reusable containers for transporting and storing food
EMAS III	Eco-Management and Audit Scheme Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a community eco-management and audit scheme, as amended in 2017 (Regulation (EU) 2017/1505) and 2018 (Regulation (EU) 2018/2026)
EMO	Environmental Management Officer
EMS	Environmental Management System
kWh	kilowatt hour
l	litre
Label ESR	Socially responsible company - Luxembourg label for socially responsible companies
LECOBOX	Mini container for separate collection of valuable and problematic products
LED	light-emitting diode
MECDD	Ministry of the Environment, Climate and Sustainable Development
NOx:	nitrogen oxides
PM	Particulate Matter
SDK	SuperDrecksKëscht® campaign
SO_2	sulphur dioxide
to	ton
TOC	Total Organic Carbon
ULC	Union Luxembourgeoise des Consommateurs (Consumer Protection Association)
VOC	Volatile Organic Compounds

Ministry of the Environment, Climate and Biodiversity
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LE GOUVERNEMENT
DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat et de la Biodiversité

Environment Agency
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L-4361 Esch-sur-Alzette
Tel: 40 56 56 -1

LE GOUVERNEMENT
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Ministère de l'Environnement, du Climat et de la Biodiversité
Administration de l'environnement

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