SDK Geliefte Klimaschutz SuperDrecksKëscht®

Aktion SuperDrecksKëscht® (SDK)*

Sustainability report 2025

* operator: Oeko-Service Luxembourg S.A.

CONTENTS

Chapters 1, 2, 3 and 7 form part of the 2026 Environmental Statement, which is supplemented in this report by Chapters 4, 5 and 6. The full Environmental Statement can be found at:

Preliminary remark on the terminology used in this environmental statement

Society does not consume waste, but products. The **SuperDrecksKëscht® /SDK campaign** therefore refers – irrespective of the legal terms – not to waste, but to products or end-of-life products or waste products, as well as valuable and problematic products.

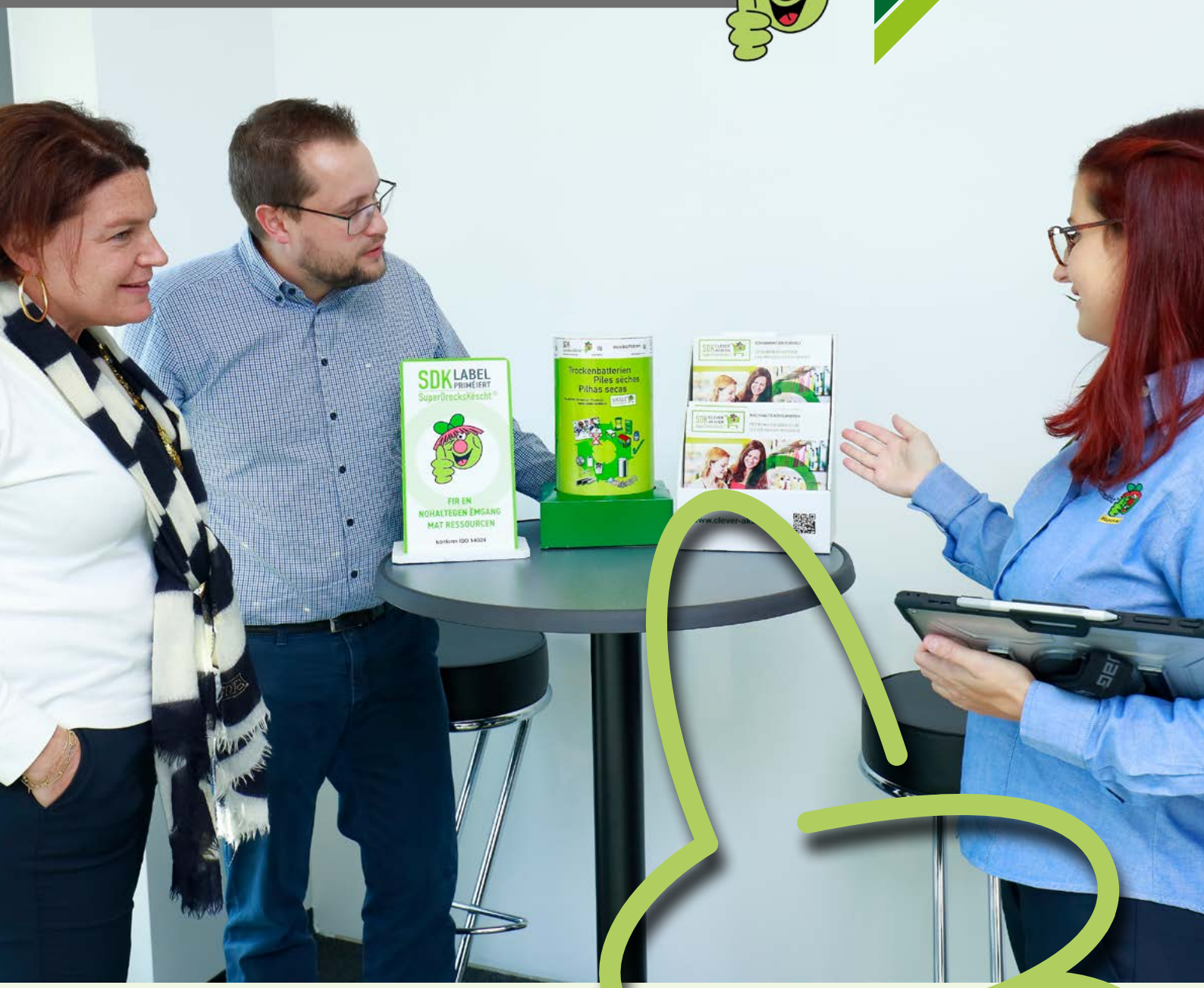
In this sense, recycling companies and waste recipients are referred to as return producers or product recipients who treat the products delivered by **SDK** using return production processes. Since the management of end-of-life products reflects consumer society, **SDK** does not refer to waste management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

We are convinced that the terminology we use promotes and further develops the appreciation of a sustainable circular economy and social awareness of participation in it.

Gender and diversity statement

For reasons of easier readability, the usual masculine form is generally used in this environmental statement for personal nouns and pronouns. Insofar as personal designations are only given in the masculine form, they refer to men, women, and diverse persons in the same way.

The **SuperDrecksKëscht® campaign** has signed the Luxembourg Diversity Charter (www.chartediversite.lu) and is thus committed to implementing social diversity among people regardless of their origin, gender, age, or disability/non-disability, as well as promoting it in cooperation with its stakeholders and working against all forms of discrimination.



1. CONTEXT AND PURPOSE

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1.1. SuperDrecksKëscht® campaign and authorised operator

The **SuperDrecksKëscht® campaign** was launched in 1985 by the then Minister for the Environment, Robert Krieps. Since 1990, Oeko-Service Luxembourg S.A. (OSL) has been commissioned as the operator (Chargé de mission) to carry out the tasks of the **SuperDrecksKëscht® campaign**. The Act of March 25, 2005, supplemented by the Act of July 15, 2022, legally defined the functioning and financing of the **SuperDrecksKëscht® campaign**. The current Waste Management Act of March 21, 2012, last amended on June 9, 2022, defines further tasks of the **SuperDrecksKëscht® campaign**.

The **SuperDrecksKëscht® campaign** is a brand that was developed as part of the waste management tasks of the State of Luxembourg. It is based on the strategy specified by the EU, with the hierarchy of prevention before preparation for reuse, before recycling, before other (e.g., energy) recovery, and before disposal of waste.

It is the task of the **SuperDrecksKëscht® campaign** to use and implement the latest information in order to achieve sustainable material management in an ecological and economic sense with high quality. The performance of these tasks then enables the organization to act as a role model in the ecological restructuring of our society. This role model function is intended to provide impetus to all participants in the economy with the aim of reducing environmental impact and promoting resource efficiency.

In addition to the Ministry of the Environment, Climate, and Biodiversity, the partners of the **SuperDrecksKëscht® campaign** are the municipalities, the Chambre des Métiers, and the Chambre de Commerce.

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

Administration de l'environnement
Grand-Duché de Luxembourg

CHAMBRE DES MÉTIERS LUXEMBOURG

CHAMBER OF COMMERCE LUXEMBOURG
POWERING BUSINESS

This environmental statement refers in legal and organizational terms to Oeko-Service Luxembourg S.A. as the operator (Chargé de mission) of the SuperDrecksKëscht® campaign. Oeko-Service Luxembourg S.A., as Chargé de mission, enters into all legal and other binding obligations, such as permits and contracts, for the SuperDrecksKëscht® campaign. In the following environmental statement, the term SuperDrecksKëscht® campaign and the abbreviation 'SDK' are always used in accordance with this definition. Similarly, the term 'campaign' is used in the sense of 'organization/company'.

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 that was developed as part of the waste management tasks of the Luxembourg state. Resources – Innovation – Sustainability – Circular Economy – these four values determine the activities of the **SuperDrecksKëscht® campaign**. It is the task of the **SDK** to use and implement the latest information in order to achieve sustainable materials management in an ecological and economic sense with high quality.

Its focus is on developing and implementing concepts for waste prevention, reuse, and recycling, as well as developing and implementing training and education programs with social and commercial relevance to environmental protection and waste.

All of **SDK**'s areas of activity 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[1)], the **SuperDrecksKëscht® campaign** has given its climate protection strategy a new framework. For this reason, a climate protection report (see pages 24 and 25) has also been included in this environmental statement. The **SDK** sees its activities as climate protection in action and has therefore also incorporated this into the brand's external image.

Since 1998, **Aktion SuperDrecksKëscht®** has been certified according to ISO 14001 for its environmental management system at its site in L-Colmar-Berg through its operating company. In 2017, the EMAS system was also introduced.

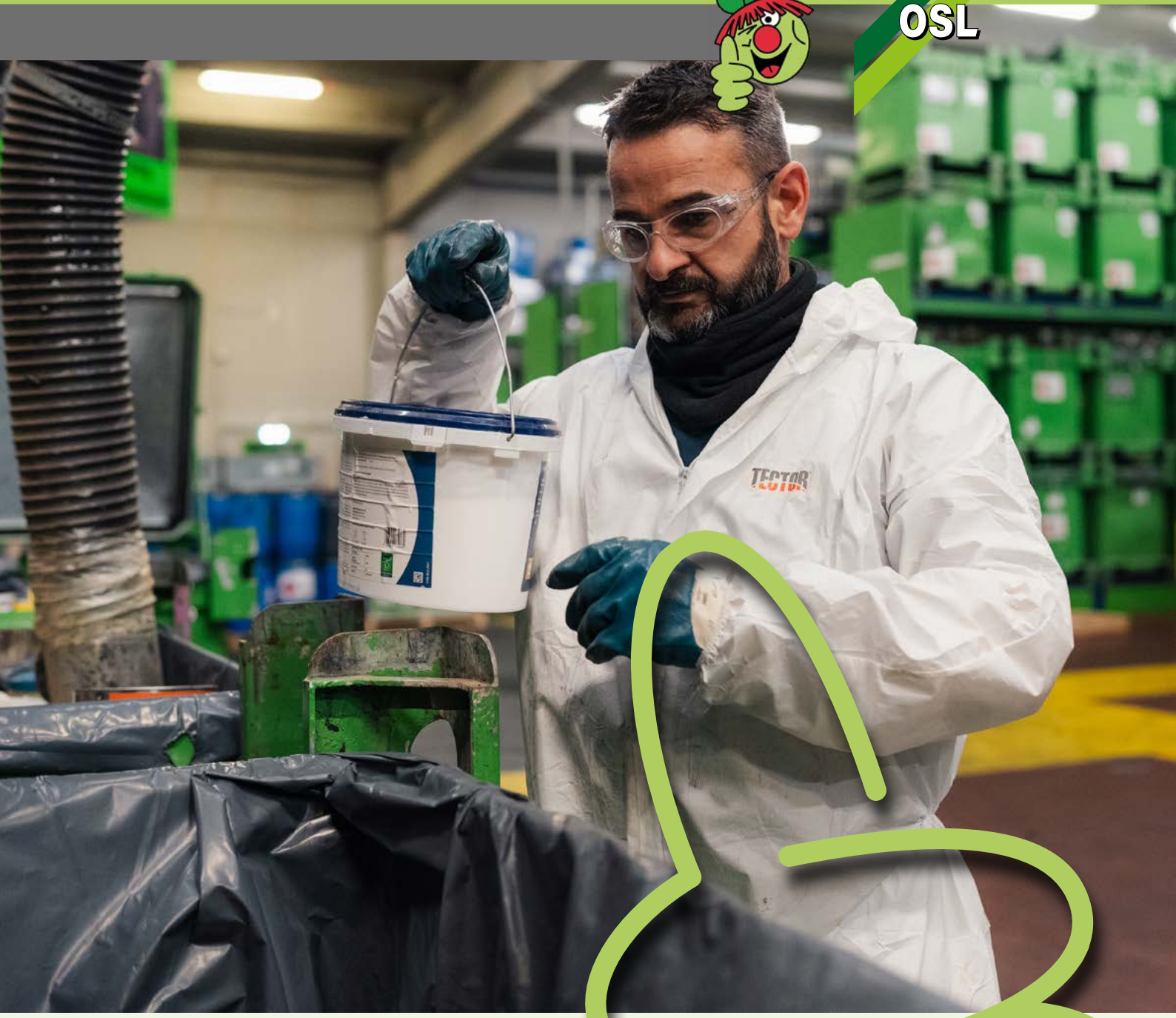
1) At the beginning of 2025, the Climate Council and the CSR/Sustainability Council were merged.

At the beginning of 2017, our environmental management system was initially certified according to EMAS and the environmental statement was validated by a state-approved environmental auditor. You now have before you the consolidated 2026 edition of the environmental statement with data from 2025.

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

The **SuperDrecksKëscht® campaign** is committed to ensuring compliance with all legal obligations that apply to it. As part of its corporate policy and the implementation of the requirements of the EMAS system, **SDK** has committed itself to firmly integrating environmental protection and the responsible use of resources, even beyond its actual area of responsibility in waste management, and to providing its partners and customers with competent advice in this regard. However, the term "environment" refers not only to "nature," but to the entire living environment, including humans themselves.

We see our commitment as a social responsibility and have been cooperating with associations, civic groups, and the social economy for many years.



2.
PROFILE OF SDK/OSL

2. PROFILE OF SDK/OSL

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 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 businesses, enabling ecological waste management in the sense of extensive separate collection of valuable and problematic products. During this phase, a brand identity was also established to build up the **SuperDrecksKëscht® campaign** as a consumer brand – 'away from the image of waste'.

In conjunction with the awarding of the **SDK** quality label, certified according to the ISO 14024 standard, to participating companies, businesses and institutions are supported on their way to responsible, environmentally friendly and resource-efficient practices.

In the third phase, the issue of prevention/resource efficiency was increasingly implied in the area of facilities/businesses. Over time, **SDK** has developed comprehensive expertise with which waste prevention activities are initiated and/or supported. Prevention is both qualitative (reduction of hazardous substances) and quantitative (reduction of quantities).

Furthermore, since 2007, consumers have been involved through the 'Shop Green' campaign (renamed 'Clever akafen' - Clever Shopping in 2022). Retailers and local producers participate not only in the **SuperDrecksKëscht® fir Betriber** campaign, but also in the trade and distribution of ecological, resource-efficient products.

In the fourth phase, which began in 2015, the **SDK** is working to address a weak point in the circular economy with the 'resource potential' tool, which is certified according to ISO 14024. This tool makes it possible to examine and evaluate both the recycling processes used by producers and the use of old products in new production in terms of resource efficiency.

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

In 2020, the **SDK** training department was finally renamed the **SDK** Academy and conceptually reorganized.

↑ Consulting

↓ Promotion of Shop Green products in retail stores

2.2. Activities and products

As part of the tasks described above, the **SuperDrecksKëscht® campaign** uses various instruments:

→ VEHICLE FLEET

For the purpose of collecting and transporting waste products, the **SuperDrecks-Këscht® campaign** has a fleet of various types of vehicles, ranging from small transporters to hook vehicles for container transport and medium-sized semi-trailers.

In addition, **SDK** cooperates with partners who collect and recycle products such as waste oil, brake fluid, coolant, contaminated fuels, emulsions, and old tires.

The transport of waste products to the product recipients is mainly carried out by partner companies.

→ LOGISTICS CENTER

The **SuperDrecksKëscht® campaign** operates a logistics center for waste products in L-Colmar-Berg. The products are handled in a range of ways, from simple temporary storage to picking and sorting to preparation for recycling (dismantling or shredding).

For quality assurance purposes, a range of products are analyzed by the company's own laboratory. This serves both to ensure clear, ADR-compliant declaration and to guarantee compliance with the quality specifications of the product recipients/return producers. A pioneering aspect in this context is the fact that, through sorting and subsequent quality control, various types of waste are returned to product status. This currently applies to gas cylinders, glasses, candle and wax residues, pallets for repair and reuse, and packaging chips.

↓ The Service-Center

For its own use, but also for sale or transfer to customers, **SDK** has a reservoir of collection containers of all types and qualities (cardboard, plastic, metal).

→ PRODUCTS

In addition to selling collection containers and accessories for collection stations, the **SuperDrecksKëscht® campaign** distributes the oil binding agent Oeko-PUR, which is a product from the recycling of refrigerators.

As part of the 'ECOBOX' project launched in 2018, a reusable system for taking food away for later consumption, **SDK** has taken over the management and distribution of the plastic trays.

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

2.3. Competencies

→ CONSULTING

Advising municipalities, citizens, businesses/institutions, and other partners is the second focus of the SuperDrecksKëscht® campaign. The consultants work largely in the field and use their own fleet of cars, most of which are electric vehicles.

The focus of the consulting services is on waste prevention and sustainable resource management. In addition to advising citizens on selective collection and the avoidance of problematic products, the focus is on developing waste management concepts for institutions and businesses and, since 2018, specific campaigns as part of the government initiative against food waste or to promote the repair and reuse of products:

- → Offering environmentally friendly products in stores (Shop Green)
- → Waste management and prevention in the construction sector
- → Waste management and prevention in residences
- → Circular economy and resource potential
  (Waste collectors and product recipients, manufacturers)
- → Intelligent use of resources
  (Food, reuse of products)

↑ Sorting of medicines

↓ Application of Oeko-Pur

→ FURTHER TRAINING (SDK ACADEMY)

The **SuperDrecksKëscht® campaign** has further expanded its range of training measures. In addition to training and further education for people working in the field of waste management (resource centers, operational waste management), this primarily concerns educational projects with schools in cooperation with the relevant ministry. On March 13, 2014, the operator of the **SDK** received official recognition as a training institution. Since September 4, 2023, the **SDK** Academy has been certified according to ISO 21001: 2021.

2.4. Organizational structure and location

The team-oriented organizational structure of the **SuperDrecksKëscht® campaign** can be seen in the diagram on the following page.

At the end of 2025 the **SuperDrecksKëscht® campaign** had 87 employees, including management.

The logistics center is located in a commercial/industrial zone directly on the A7 motorway, exit Colmar-Berg/Roost. There is a connection to public transport (bus), but only at limited times. Colmar-Berg has a train station, which is not located in the immediate vicinity of the industrial zone.

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

The company premises are directly adjacent to a residential area (Rue du Faubourg). This is the rear of the logistics center, which is separated from the residential area by a 100-meter-long green strip. There is generally no goods or public traffic here.

↓ **The employees of SDK**

2.5. Compliance

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

Particularly relevant are the adjacent laws, the waste management legislation, and the law on the functioning and financing of the **SuperDrecksKëscht® campaign** (see page 3).

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

- Broker, dealer, and transport permit for waste products
- Waste management permits
- Wastewater permits
- Commodo-Incommodo permits
- Registration for waste transport

All safety-related facilities are listed in the Commodo-Incommodo permits. These are operated as specified. Other binding obligations towards the municipality and other stakeholders are also recorded in the aforementioned checklist.

The **SuperDrecksKëscht® campaign** undertakes to ensure compliance with all legal and other binding obligations that apply to it.

↓ **Excerpt from the legal register**
Status february 2026

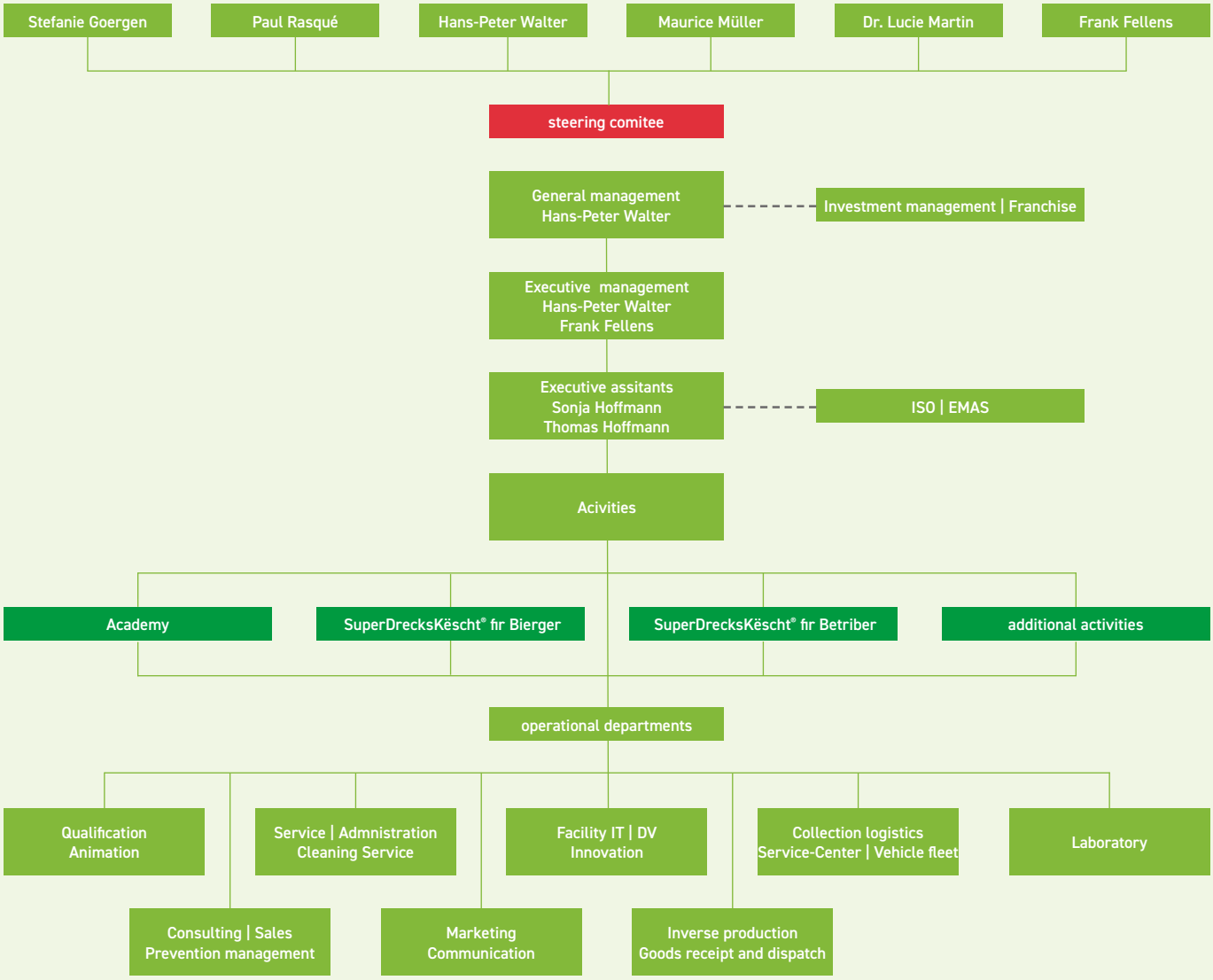
Wesentliche Gesetze für SuperDrecksKëscht
Stand: Februar 2026

N°	Kategorie	Bereich	Name	Mémoria / EUI	Jahr	Statut	Relevanz
1	Abfallgesetzgebung	Abfall	Richtlinie 2008/98/EG des Europäischen Parlaments und des Rates vom 19. November 2008 über Abfälle	EU	2008	modifiziert durch Verordnung 1357/2014 2015/1127 201/997 2018/851 2023/1542	hoch
2	Abfallgesetzgebung	Abfall	Loi du 21 mars 2012 relative à la gestion des déchets, et modifiant 1) 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	2012A060	2012	modifiziert durch 2022A267	hoch
3	Abfallgesetzgebung	Abfall	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	2014A225	2014		hoch
4	Abfallgesetzgebung	Abfall	Règlement grand-ducal du 24 mars 2015 remplaçant l'annexe V de la loi Modifiée du 21 mars 2012 relative aux déchets	2015A060	2015		hoch
5	Abfallgesetzgebung	Abfall	Règlement grand–ducal du 24 novembre 2015 modifiant l'annexe II de la loi Modifiée du 21 mars 2012 relative aux déchets.	2015A227	2015		hoch
6	Abfallgesetzgebung	Abfall	Loi du 18 décembre 2015 modifiant la loi Modifiée du 21 mars 2012 relative aux déchets	2015A256	2015		hoch

→ NOTE ON THE SECTOR-SPECIFIC REFERENCE DOCUMENT ON WASTE MANAGEMENT (DECISION (EU) 2020/519)

The best practices specified in the reference document – waste management strategy, specific waste management plans, promotion of waste prevention, reuse, waste treatment for material recovery (circular economy) – are among the core tasks of the **SuperDrecksKëscht® campaign** (see also the environmental program, in particular regarding indirect environmental aspects) . The resource potential tool developed by **SDK** in accordance with ISO 14024 is also of particular importance here. A review of the reference document shows that the recommendations have been largely fulfilled, where applicable. The environmental performance indicators specified in the document have been in use for a long time (e.g., for the collection of waste products from the healthcare sector in private households).

2.6. Organizational chart and company premises



↑ The 2025 organizational chart has changed slightly compared to the organizational chart in last year's environmental statement. There have been changes in the management of **SDK**.

← The site plan shows the location of the logistics center in the Zone Industrielle Piret, Colmar-Berg (circled in red) and the adjacent buildings.

3. THE ENVIRONMENTAL MANAGEMENT SYSTEM

3. THE ENVIRONMENTAL MANAGEMENT SYSTEM OF OSL/SUPERDRECKSKËSCHT® CAMPAIGN

3.1. Environmental management system

Since the introduction of ISO 14001 in 1998, the environmental policy and guidelines have formed 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, primarily the training documents 'Marke **Aktion SuperDrecksKëscht®**', 'ISO 14001', 'ISO 14024' and 'ESR Label', the annual reports/sustainability reports and the **SDK** manual. They provide information about the purpose and implementation of the EMS, internal processes, responsibilities, and relevant legal regulations.

The management of Oeko-Service Luxembourg S.A., as the operator of **Aktion SuperDrecksKëscht®**, is responsible for the continuous operation of the system. The steering committee (SC) advises and discusses all relevant topics, makes recommendations, and submits proposals. The management is supported by the environmental management officer (EMO) and other designated persons. The UMB keeps the EMS documentation, including all key figures, up to date, drafts the environmental statement, and is the contact person for employees and those with environmental protection-related functions (e.g., administration: environmental aspect "procurement of goods and services").

Furthermore, the UMB coordinates all EMS matters and informs the steering committee about the development of the system on behalf of the management. Based on this information, the steering committee makes recommendations after consultation and discussion. The management/executive board provides the necessary resources for the continuation of the environmental program.

The EMS is designed as a dynamic system. Every employee can and should contribute to the development process of the EMS and participate in the achievement of environmental goals. For this reason, there is an internal suggestion scheme through which all employees can submit change requests and suggestions.

The management and the UMB are available to employees as contact persons for questions and suggestions. Information is also exchanged in direct communication (meetings, "corridor conversations," internal emails) and, if necessary, incorporated into the EMS.

In 2022, two new committees were established as part of sustainability and stakeholder management: the Climate Protection Team and the RSE Team, which support UMB in related matters. These two committees were merged in 2025, and the works council is also involved.

↓ Participation MANIFESTO 2025

As part of the implementation of the Whistleblower Protection Act of May 16, 2023, two reporting channels were set up. 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 stakeholders from the professional environment and those involved in ISO 14024 certification. This also applies to reports relating to the protection of human rights.

The monitoring committee of the logistics center meets three times a year. In addition to the steering committee, the management, the safety officer, and the UMB of the **SuperDrecksKëscht® campaign**, its members include neighbors, municipal officials, and emergency services (fire department) from the municipality of Colmar-Berg.

Based on the environmental policy, the environmental management system process is as follows: Definition of environmental objectives ⇢ assessments ⇢ evaluation ⇢ action planning ⇢ implementation ⇢ performance review

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

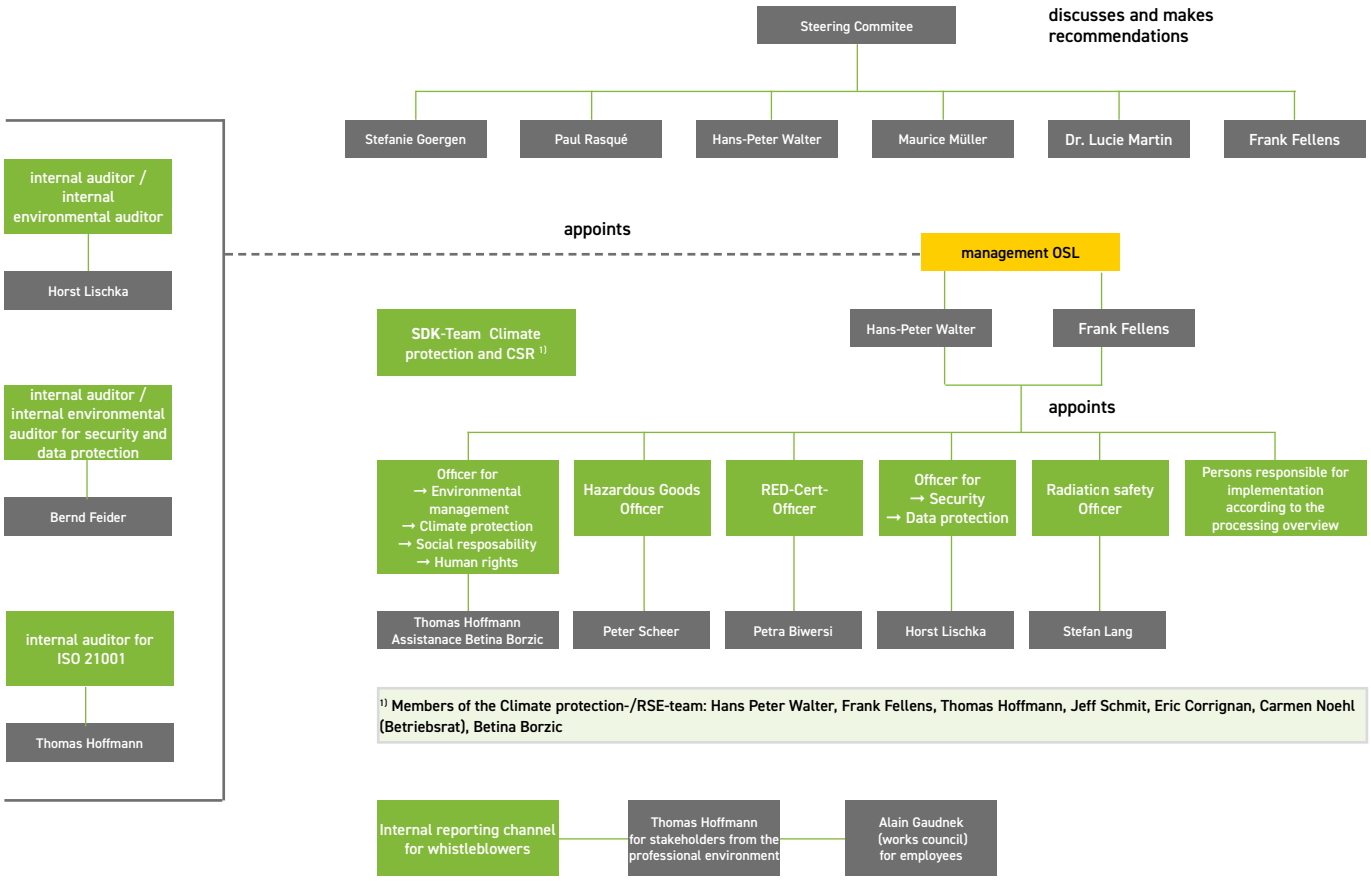
By publishing an environmental statement that is updated at regular intervals and validated by an external environmental verifier, we inform customers, business partners, and other interested parties about the company's environmental performance. The stakeholders/interested parties are listed in the annual report/sustainability report and are evaluated using an opportunity-risk matrix.

Other relevant reports are:

- the climate protection report,
- the report of the RSE representative,
- the report on the protection of human rights

OVERVIEW OF THE ADVISORY BOARD, THOSE RESPONSIBLE, AND THE COMPANY REPRESENTATIVES

Organizational chart ISO 14001 / EMAS with functions and areas of responsibility



3.2. Code of conduct and environmental code

The actions and activities of the **SuperDrecksKëscht® campaign** and its employees are based on principles and binding guidelines set out in the employee guidelines, the environmental code, and the code of conduct.

The core competencies of the **SuperDrecksKëscht® campaign** are aspects of ecological and sustainable business practices and providing advice to consumers, institutions, and companies on consumption and waste management, with the particular aim of waste prevention.

In addition to its responsibility for protecting the environment within the scope of **SDK**'s activities, social responsibility is also of great importance. The following applies:

↓ Code of Conduct 2025

The activities of the **SuperDrecksKëscht® campaign** are planned and carried out with the active involvement of employees in such a way that natural resources are conserved as much as possible, harmful environmental impacts are minimized, and the applicable legal regulations are strictly adhered to.

In order to continuously improve environmental performance, the steering committee sets targets and updates programs for their implementation.

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

When procuring products and services, **SDK** gives preference to those that are manufactured or offered in accordance with the principles of a resource-efficient and sustainable economy. Within the scope of its possibilities, it encourages its business partners and suppliers to follow equivalent principles.

To ensure compliance with the procurement criteria, training was conducted in 2025 for all employees involved in procurement, providing detailed information about the criteria and their implementation.

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

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

Code of Conduct

CRITERIA AND TASKS FOR IMPLEMENTING THE ENVIRONMENTAL POLICY (COLMAR-BERG SITE)

The following environmental code applies to the implementation of the tasks and objectives described in section 3.2 (as of June 2024; next page)

↓ The environmental code of conduct as of June 2024
(Translation of the German original)

Environmental Code

The **SuperDrecksKëscht campaign®** is a resource efficiency brand that was developed as part of the sustainability of the waste management tasks of the State of Luxembourg. Its orientation is based on the EU waste hierarchy and the national legislation of 2012: prevention before preparation for reuse, before recycling, before other recovery (e.g. energy recovery) and before disposal. Accordingly, the focus is on prevention and therefore resource management.

It is the task of the **SuperDrecksKëscht campaign®** to use and implement the latest information in order to realize a sustainable resource management in the ecological and economic sense with high quality. Performing this task enables the implementation of a role model function in the ecological reorganization of society. This role model function is intended to provide impetus to all stakeholders in the economy with the aim of reducing the burden on the environment and improving resource efficiency.

With this in mind, **Aktion SuperDrecksKëscht®** 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 goals:

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

- **Saving raw materials through resource efficiency management**
- **Avoidance of waste products**
- **Preparing waste products for reuse ('re-use')**
- **Recycling and recovery instead of disposal of waste products**
- **Intelligent and sustainable product design**
- **New production and reverse engineering processes**
- **Change in consumption patterns ('sharing economy')**
- **Transparency of all product flows**

➪ ***As part of general environmental precautions and health protection***

- **Energy management and climate protection**
- **Environmental protection and sustainability at suppliers and processing partners**
- **Prevention of environmental accidents**
- **Environmental accident procedures - Reduction of environmental impact**

➪ ***In the context of social responsibility***

- **Consideration of the interests of all stakeholders**
- **Compliance with social standards at local and global level**
- **Fair framework conditions for employees and partners**
- **Training, information and awareness-raising in environmental protection**

The following management tasks must be implemented in order to achieve the targets set:

➪ ***Direct measures***

- **Measures to minimize emissions during the recycling, recovery and disposal of waste**
- **Avoidance of accidental emissions and discharges**
- **Advance assessment of impacts on the environment and society**
- **Assessment of environmental and social impacts**
- **Checking compliance with the environmental code**
- **Measures in the event of non-compliance with the Environmental Code**

➪ ***Indirect measures***

- **Promoting a sense of responsibility among employees**
- **Information and dialog with all stakeholders**
- **Advice for all partners**
- **Compliance with environmental standards by suppliers and contractual partners**

June 2024

Management and environmental management officer

3.3. Corporate social responsibility[1)]

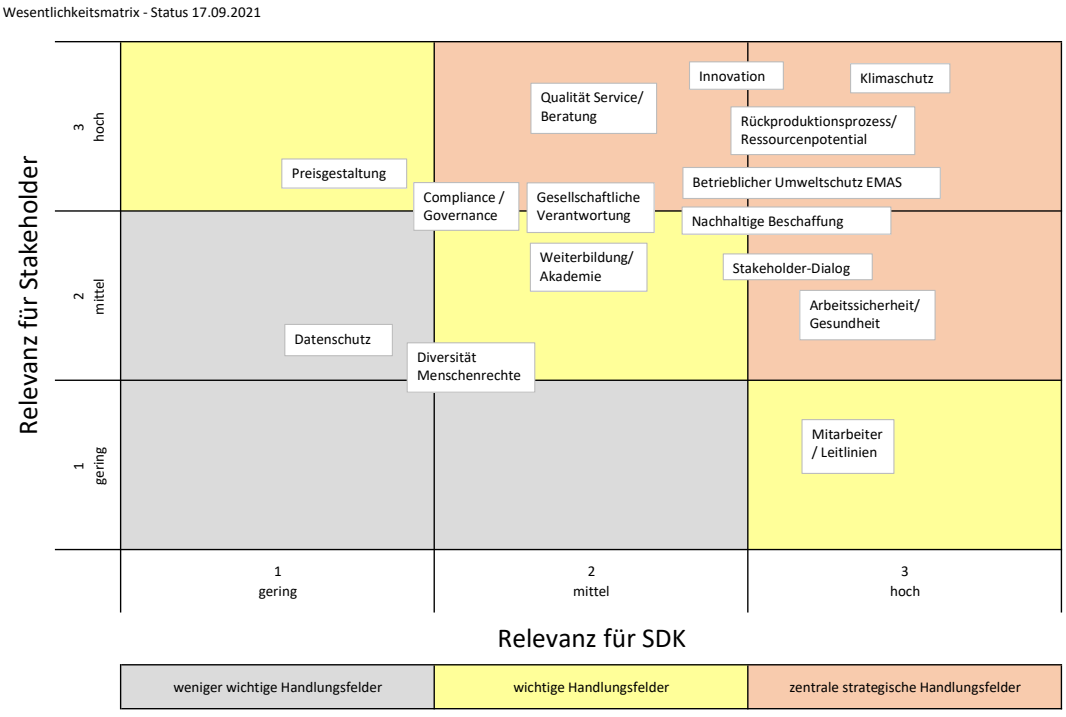
As mentioned, the environmental policy also includes essential social aspects. In this regard, the **SuperDrecksKëscht® campaign** has been participating in the national RSE label certification system since 2011 and is certified as a socially responsible company. Within this framework, **SDK** has also signed two voluntary commitments, namely the 2019 charter for the promotion of diversity and the 2022 national human rights pact. Reference is made here to the report of the RSE officer and the report of the human rights officer.

3.4. Materiality matrix

Materiality analysis is a key tool in sustainability management and strategic corporate governance. It serves to identify and prioritize those issues that are of particular importance to a company and its stakeholders. The aim is to create transparency, use resources in a targeted manner, and lay the foundation for credible reporting.

As part of a materiality analysis, potentially relevant environmental, social, and economic issues were systematically identified and evaluated. Both the impact of business activities on the environment and society (impact perspective) and the financial risks and opportunities for the company (financial perspective) were taken into account.

[1)] Note: Reports and certificates relating to corporate social responsibility (CSR), including the human rights pact, are not validated by the environmental reports.



↑ **Materiality matrix**
Status 2021 (in German)

3.5. Stakeholders

The annual report/sustainability report and the report of the CSR officer provide a detailed introduction to **SDK**'s stakeholders with whom it cooperates and carries out joint projects.

The **SuperDrecksKëscht® campaign** maintains a matrix listing all interested parties and their relevant requirements and expectations. On this basis, the resulting opportunities and risks are also identified and evaluated. Due to its special role, **SDK** is often active as a networker in the area of consumption and recycling. Therefore, the list of stakeholders represents almost all socially active players. The main opportunity here is the support of the **SDK** recycling strategy, while the main risk is a lack of coherence.

In addition to the client and the action partners—which include all Luxembourg municipalities—and the employees and customers, the stakeholders are: partners with whom contracts exist, other public partners, environmental groups/associations/NGOs, civil protection (police, fire department), trade associations, companies, project partners/platforms/interest groups, training institutions, suppliers, neighbors, the public, and the media (see table below).

Communication with internal stakeholders (employees) is carried out using a variety of tools. Employees are closely involved in the continuous improvement process through:

- Department, team, and working group meetings/employee appraisals
- Meetings between management and the works council

An anonymous online employee survey is planned for 2026.

Neighbors, residents, civil protection (police, fire department), and community representatives, as well as the Ministry of the Environment, the Environmental Administration, the Chamber of Trades, and the Chamber of Commerce, are kept informed about the activities of the **SuperDrecksKëscht® campaign**, particularly at the Colmar-Berg logistics center, through the monitoring committee. Members have access to the company premises at any time.

- As a rule, the monitoring committee meets three times a year.
- Communication with interested parties is diverse and uses the following instruments, among others:
- Joint meetings and workshops
- Review of public statements, internal programs, and initiatives by stakeholders
- Participation/membership in interest groups
- Direct communication
- Information from the media and other public sources

The Logistics Center Monitoring Committee and the consumer protection association ULC (Union Luxembourgeoise des Consommateurs) play a special role.

↑ **The Service Centre's mobile collection service**

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

Category	Stakeholder	Commitments - Collaboration	Requirements and expectations	Obligations - Cooperation	Opportunities	Risks
Principal and campaign partners	MECB	Contracting authority	Contracting authority	Steering Committee and direct discussions	—	—
	Environmental Administration	Principal authority	Principal authority	Steering Committee and direct discussions	—	—
	Chamber of Crafts	Member of the steering committee	Member of the steering committee	Steering Committee and direct discussions	—	—
	Chamber of Commerce	Member of the steering committee	Member of the steering committee	Steering Committee and direct discussions	—	—
	Municipalities	Legally responsible for household waste	**SDK** as a service provider for municipalities - Consulting/Support	One-on-one meetings	Support for the **SDK** philosophy/environmental policy	Lack of alignment between municipal and **SDK** strategies
	Municipal syndicates	Legally responsible for household waste	**SDK** as a service provider for municipal syndicates - Consulting/Support	One-on-one meetings	Support for the **SDK** philosophy/environmental policy	Lack of alignment between municipal and **SDK** strategies
	Resource centers	Facility for municipalities, municipal syndicates	**SDK** as a service provider for resource centers – consulting/support	Meetings, one-on-one discussions, professional development	Support for the **SDK** philosophy/environmental policy	Lack of alignment between municipal and **SDK** strategies
Contractual partners	Ecobatterien	**SDK** is the contractor	Contractual fulfillment of services and compliance with obligations defined by the legal reglementation	Monitoring committee meetings and direct discussions	Support for the **SDK** philosophy/environmental policy	Non-compliance with the convention
	Ecotrel	**SDK** is a contractor and partner in public communication	Contractual fulfillment of services and compliance with obligations defined by the legal reglementation	Monitoring committee meetings and direct discussions	Support for **SDK**'s philosophy/environmental policy: Participation in innovation projects	Non-compliance with the convention
	Valorlux	Contractual partner	Contractual fulfillment of mutual obligations	Direct discussions	Support for **SDK**'s philosophy/environmental policy: Participation in innovation projects	Non-compliance with the convention
	Cooperation partner	Partner operates in accordance with the quality and environmental criteria specified by **SDK** (collection on behalf of **SDK** + transport to product recipients)	**SDK** as consultant, certification body, auditor	Visits, meetings, training sessions, audits	Support for the **SDK** philosophy/environmental policy	Non-compliance with the convention; environmental scandals
	Product recipients	Contractual partners	Reliability and transparency on the part of the product recipient	Visits, meetings, audits, audits Resource potential	Support for the **SDK** philosophy/environmental policy	Non-compliance with the convention; environmental scandals

↑ **Excerpt from the comprehensive stakeholder checklist Status/ last updated: January 2026**

4. SOCIAL RESPONSIBILITY – OUR COMMITMENT TO SOCIETY

4. SOCIAL RESPONSIBILITY – OUR COMMITMENT TO SOCIETY

Sustainability encompasses not only environmental and economic responsibility, but also social responsibility. The **SuperDrecksKëscht® campaign**'s commitment is evident, for example, in the employment of disabled staff or in the involvement of neighbours, the local fire brigade and local authority representatives within the framework of the monitoring committee. The **SDK** has therefore been awarded the ESR label for sustainability and social responsibility by the INDR (Institut national pour le développement durable et la responsabilité sociale des entreprises; www.esr.lu).

Key aspects of the organisation's social commitment are already outlined in sections 3.2 to 3.5 of this sustainability report as part of the environmental statement. This section therefore supplements that by addressing the commitment to human rights and protection against discrimination, responsibility for its own employees, as well as activities in the areas of information, awareness-raising and support for citizens, and, as part of this, the **SDK Academy**.

4.1. Protection of human rights and against discrimination

HUMAN RIGHTS

On 6 July 2022, **SDK** signed the National Pact on Business and Human Rights, thereby committing itself to raise awareness of human rights among employees and stakeholders, appoint a human rights officer, train its employees on human rights issues, implement a corporate strategy for identifying human rights issues, establish a process for reporting human rights violations, and publish an annual human rights report.

As part of the implementation of the Whistleblower Protection Act of 16 May 2023, two reporting channels were set up in 2023. The reporting channels are intended for the confidential submission of complaints, objections and claims. A member of the works council is available to employees. The Environmental Management Officer is available to all stakeholders from the professional sphere as well as to parties involved in the context of ISO 14024 certifications. This also applies to reports concerning the protection of human rights.

DIVERSITY / INTEGRATION OF DISADVANTAGED PEOPLE

On 26 September 2019, **SDK** signed the Diversity Charter, in which it commits to respecting diversity. This applies both internally in relation to its own employees and with regard to external stakeholders.

The **SuperDrecksKëscht® campaign** awards a proportion of its contracts to social economy organisations that employ socially disadvantaged people. Examples include the Service de l'Entraide (CNDS) and the delivery of meals by ATP (Ateliers thérapeutiques) Schieren.

There is a long-standing close collaboration with the Ligue HMC regarding the employment of people with disabilities at the **SDK**'s logistics centre. These individuals are trained and given further training by the **SDK**. The group consists of a total of 10 employees and two social workers at the site. The employees are responsible for sorting data storage media (video and audio cassettes, CDs/DVDs, vinyl records), toner cartridges, ink cartridges, PU foam cans, plastic film, polystyrene and foam parts (PE, EPS), lamps, medicines, candles and waste electrical and electronic equipment. Following consultation with those in charge, Ligue HMC staff may also be deployed for other tasks (e.g. cleaning and dismantling kitchen fat buckets).

The Infocenter, which welcomes visitors during training sessions and tours, is accessible via a wheelchair-accessible path. In addition, a ramp has been installed to make the remaining step at the car park entrance barrier-free. The Infocenter also features a disabled-accessible toilet.

The **SDK** website also features an accessibility function.

↓ **Cleaning of kitchen oil and fat containers with the support of the Ligue HMC**

4.2. Responsibility towards staff

GUIDELINES FOR INTERACTING WITH ONE ANOTHER

All staff members have undertaken to respect the following guidelines in their conduct and interactions with one another:

- Punctuality and personal appearance (punctuality, cleanliness in the workplace, clean and appropriate work attire)
- Careful and responsible use of the resources provided (responsible care and maintenance of all resources and infrastructure, such as computers, vehicles, etc.)

- Motivated support for restructuring measures (willingness to implement all restructuring measures, contributing suggestions for improvement, consistent flexibility)
- Adherence to the **SDK** culture (honest and open interaction with one another, respect for other employees, support for others, particularly new employees)
- Compliance with quality and safety guidelines (adherence to agreements in individual work areas, as well as compliance with and implementation of the environmental code in accordance with EMAS/ISO 14001)

There is a procedure in place for suggestions for improvement. Successful suggestions are rewarded. Compliance with the guidelines is reviewed annually. Any deviations are discussed in a staff appraisal where necessary.

INTERNAL DIVERSITY

The workforce at **SDK** is very diverse in terms of gender, age and nationality. There are no differences in this regard when it comes to the allocation of management positions and salaries. **SDK** employs staff of the following nationalities, amongst others: Luxembourg, Germany, Italy, Belgium, Portugal, France.

WORKING HOURS

SDK employees have individual flexibility in organising their workplace and working hours within the framework of the agreements. The option to organise weekly working hours flexibly has been in place for years.

Personal appointments can also be attended to between 8.00 am and 5.00 pm. Where working from home is possible, this option can be utilised flexibly. Arrangements are made within the team or department. The option to disconnect (be unreachable) is also explicitly authorised by management.

Flexibility also applies to total working hours. All feasible variations are possible here, e.g. in addition to 80% (most common), also 90% (36 hours), 75% (30 hours) and 70%. Parental leave can be flexibly combined with total working hours.

Management and coordinators discuss the working situation and potential for improvement during staff meetings.

WELL-BEING IN THE WORKPLACE

In the offices/administration department, height-adjustable desks have been installed in recent years to enable back-friendly working. In the production department, a lifting aid ('exoskeleton') was introduced in 2023, which also helps to protect the back.

↓ **Employee recognition for long-standing service in 2025**

In 2024, a room was made available where 'Fitness at Work' sessions are held regularly once a week.

In addition to their salary, employees receive a gift on birthdays and for events such as weddings and births. 'Milestone' work anniversaries are recognised from 10 years onwards and every 5 years thereafter with a celebratory ceremony.

Other benefits include a free fruit basket and free drinks (water, coffee, tea, juices; milk and oat milk).

WORKS COUNCIL

The current Works Council was newly elected in 2024. It consists of four members and represents the interests of all employees. Within the framework of the ISO 14001 and RSE certifications, the Health and Safety Officer and the Sustainability Officer continue to look after the interests of the employees.

HEALTH AND SAFETY

On 30 October 2018, **SDK** signed the national Vision Zero Accidents charter. The health and safety officer is responsible for health and safety and regularly checks compliance with safety regulations, such as the wearing of safety goggles and protective clothing in the logistics centre. This also includes regular measurements of workplace air quality and employee exposure in the reverse logistics production area. For new recruits, as well as as part of ongoing staff development, the health and safety officer regularly conducts refresher training on operational procedures.

Employees can take part in driver safety training and first-aid training (first-aiders). First aid training is mandatory for employees with direct customer contact and for employees who have direct contact with hazardous products or handle hazardous products. A list of first aiders is accessible to all employees. Training on the use of fire extinguishers is also offered regularly.

INDUCTION AND PROFESSIONAL DEVELOPMENT

All new employees start on their first day with a detailed tour of the premises and a personal introduction to all staff present on that day. An induction plan, spanning several weeks, enables the new employee to familiarise themselves with all areas of **SDK**'s operations.

In-house career development is regularly discussed in staff meetings. In-house events designed to facilitate informal interaction among staff take place regularly and are organised by both management/coordinators and the works council.

Based on the competency profile (job description), all staff are provided with opportunities for ongoing personal development. In addition to compulsory training for all staff in the respective department, everyone is given the opportunity to take up individual offers, such as those aimed at improving language skills.

↑ Measurement at the filter tower

All employees are given the opportunity to take on more responsibility, as well as to change their area of work.

Following a prolonged absence due to illness or family leave, a reasonable period of re-induction is granted. Employees facing personal crises are granted appropriate support.

Employees seeking a different challenge outside **SDK** are fully integrated until their departure.

4.3. The SDK Academy

The **SDK Academy** is a cross-cutting tool designed to raise awareness, provide information and offer training within the framework of the **SuperDrecksKëscht® campaign** (**SDK fir Bierger**, **SDK fir Betriber** and additional activities). It offers a wide range of information, awareness-raising and training programmes on the topics of sustainable action, resource conservation and the circular economy.

As part of its public awareness-raising efforts, the **SDK** took part in 18 events in 2025. These included the YEP-Schoulfoire, the Foire Agricole d'Ettelbruck and the BNE-Foire. In 2025, 13 groups comprising 150 participants visited the **SuperDrecksKëscht® campaign** at the Colmar-Berg site.

As part of awareness-raising efforts for children, pupils and students in primary schools, Maison Relais, secondary schools and higher education institutions, 521 activities took place in 2025. This enabled 8,782 pupils to be reached.

In the context of further training, the **SDK Academy** focuses on collaboration with sector-specific partners. In 2025, training courses were held in collaboration with partners such as the Chamber of Crafts, House of Training, IFSB, INAP, IFEN, Horesca and CNFPC. Furthermore, specific training courses were held for staff at the resource centres and for cooperation partners of the SuperDrecksKëscht® initiative. A total of 236 training modules were held, attended by 2,848 participants. As part of the project for refugee accommodation (in collaboration with the ONA – Office National de l'Accueil), seven training courses were conducted for carers.

Internal qualification: The deployment of qualified staff to manage the **SuperDrecksKëscht® campaign** is mandatory. With this in mind, OSL staff were trained in 179 internal training modules in 2025.

The total training volume of the **SDK Academy**'s activities in 2025 amounted to:

- external provision: 785 activities with 12,534 participants
- internal training: 179 modules with 324 person-days.

↑ **Visite SDK by the Chamber of Commerce 2025**

↓ **Participation in the Yep Schoulfoire 2025**

Since 2023, the **SDK Academy** has been the first institution in Luxembourg to be awarded ISO 21001 certification, which stands for the quality of an educational organisation. The surveillance audit on 21 July 2025 revealed no non-conformities.

4.4. Advice for consumers and businesses

Information and awareness-raising, outreach and training are the main areas of activity for the **SuperDrecksKëscht® campaign** and are aimed at all sections of society. In 2025, 28,647 customers and partners were advised via telephone and email, covering 29,469 topics; of these, 5,648 were general enquiries regarding waste management. Based on 250 working days, 118 questions were answered per day.

For staff and partners who also provide advisory services, there is a digital portal which, in addition to the latest brochures and leaflets, contains further information on product handling, collection systems and businesses awarded the label.

MEDIA

The full range of media is utilised to inform consumers about ecology, the handling of products from purchase to disposal, ways to reduce waste, and the **SuperDrecksKëscht® campaign** quality label. Together with the Consumer Protection Association, a thematic plan was also drawn up for 2025, setting out monthly focus topics.

In addition to publications in 'de Konsument', advertisements and articles were published in 2025 in German, French, English and Portuguese-language magazines and journals. Product information sheets are made available to Luxembourg's municipalities for publication in their community newsletters aimed at residents.

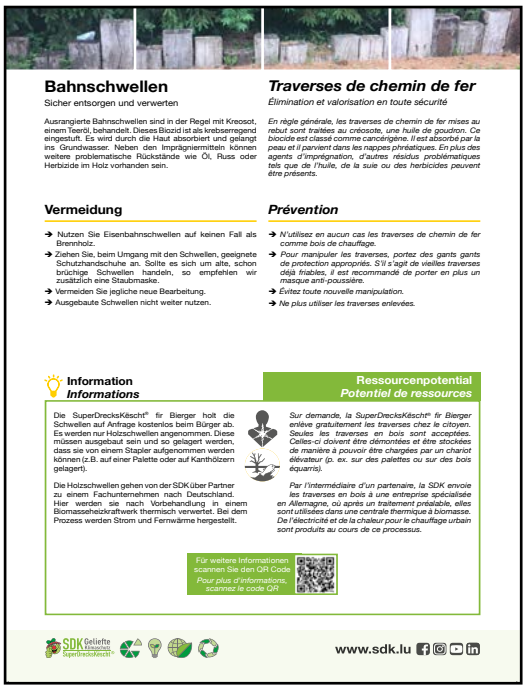
To promote businesses awarded the label, adverts are regularly broadcast on RTL Radio, as well as 2–3-minute spots once a week on RTL Radio covering specific topics on the sustainable use of products and waste prevention. The features are available as mini-podcasts via the website sdk.rtl.lu. Further regular programmes were broadcast on Radio Latina. The latter is primarily aimed at French- and Portuguese-speaking listeners.

INTERNET, SOCIAL MEDIA AND NEWSLETTERS

The website www.sdk.lu (including www.shop-green.lu and www.ressourcen-potential.com) was completely revamped and restructured in 2021. The product encyclopaedia, which contains detailed information on the circular economy and waste prevention options, was expanded and further developed.

↑ Telephone consultation

↓ Infographic: Railway Sleepers 2024



Bahnschwellen
Sicher entsorgen und verwerten

Ausrangierte Bahnschwellen sind in der Regel mit Kreosot, einem Teeröl, behandelt. Dieses Biozid ist als krebserregend eingestuft. Es wird durch die Haut absorbiert und gelangt ins Grundwasser. Neben den Imprägniermitteln können weitere problematische Rückstände wie Öl, Russ oder Herbizide im Holz vorhanden sein.

Traverses de chemin de fer
Élimination et valorisation en toute sécurité

En règle générale, les traverses de chemin de fer mises au rebut sont traitées au créosote, une huile de goudron. Ce biocide est classé comme cancérigène. Il est absorbé par la peau et il parvient dans les nappes phréatiques. En plus des agents d'imprégnation, d'autres résidus problématiques tels que de l'huile, de la suie ou des herbicides peuvent être présents.

Vermeidung

- Nutzen Sie Eisenbahnschwellen auf keinen Fall als Brennholz.
- Ziehen Sie, beim Umgang mit den Schwellen, geeignete Schutzhandschuhe an. Sollte es sich um alte, schon brüchige Schwellen handeln, so empfehlen wir zusätzlich eine Staubmaske.
- Vermeiden Sie jegliche neue Bearbeitung.
- Ausgebaute Schwellen nicht weiter nutzen.

Prévention

- *N'utilisez en aucun cas les traverses de chemin de fer comme bois de chauffage.*
- *Pour manipuler les traverses, portez des gants de protection appropriés. S'il s'agit de vieilles traverses déjà friables, il est recommandé de porter en plus un masque anti-poussière.*
- *Évitez toute nouvelle manipulation.*
- *Ne plus utiliser les traverses enlevées.*

Information
Informations

Die SuperDrecksKëscht® fir Bierger holt die Schwellen auf Anfrage kostenlos beim Bürger ab. Es werden nur Holzschwellen angenommen. Diese müssen ausgebaut sein und so gelagert werden, dass sie von einem Stapler aufgenommen werden können (z.B. auf einer Palette oder auf Kanthölzern gelagert).

Die Holzschwellen gehen von der SDK über Partner zu einem Fachunternehmen nach Deutschland. Hier werden sie nach Vorbehandlung in einem Biomasseheizkraftwerk thermisch verwertet. Bei dem Prozess werden Strom und Fernwärme hergestellt.

Ressourcenpotential
Potentiel de ressources

Sur demande, la SuperDrecksKëscht® fir Bierger enlève gratuitement les traverses chez le citoyen. Seules les traverses en bois sont acceptées. Celles-ci doivent être démontées et être stockées de manière à pouvoir être chargées par un chariot élévateur (p. ex. sur des palettes ou sur des bois équarris).

Par l'intermédiaire d'un partenaire, la SDK envoie les traverses en bois à une entreprise spécialisée en Allemagne, où après un traitement préalable, elles sont utilisées dans une centrale thermique à biomasse. De l'électricité et de la chaleur pour le chauffage urbain sont produits au cours de ce processus.

Für weitere Informationen scannen Sie den QR Code
Pour plus d'informations, scannez le code QR

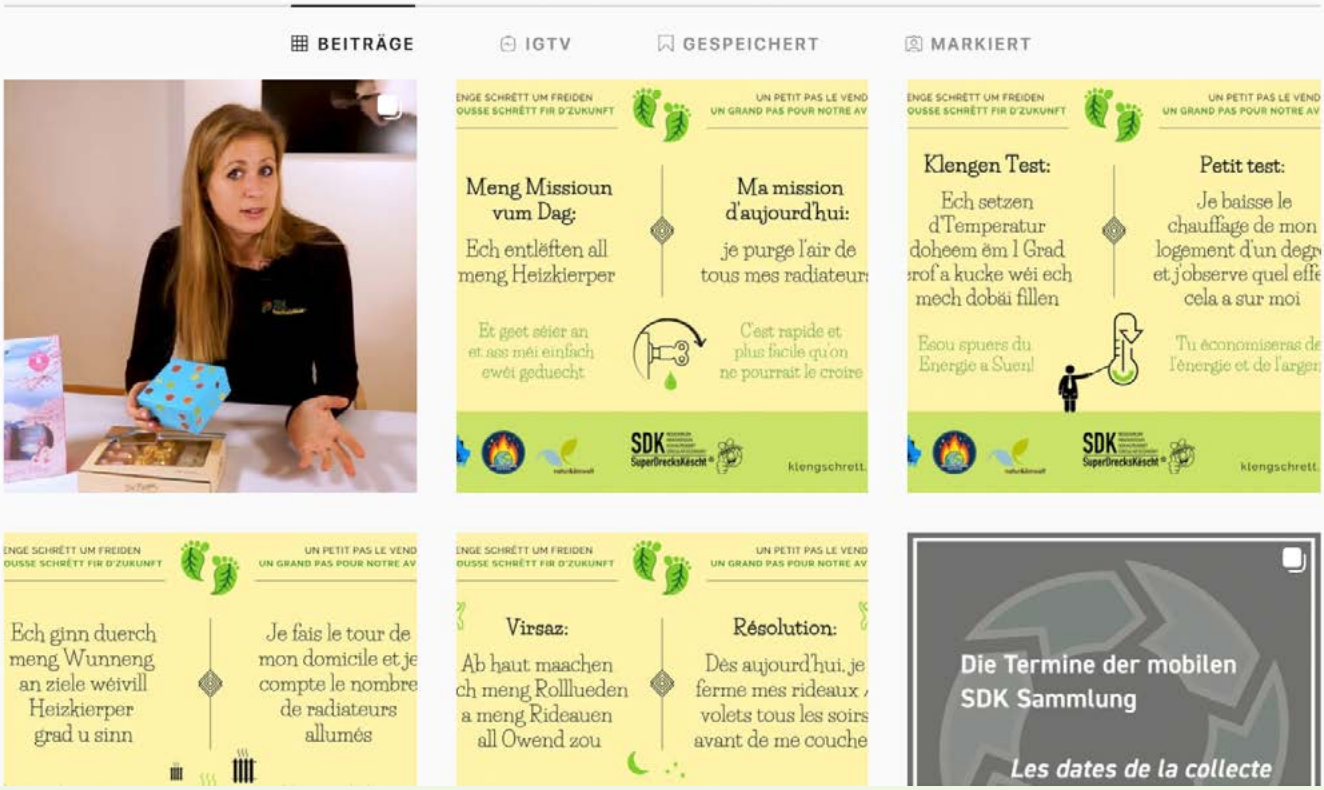
SDK Eeliette Klenscht SuperDrecksKëscht®

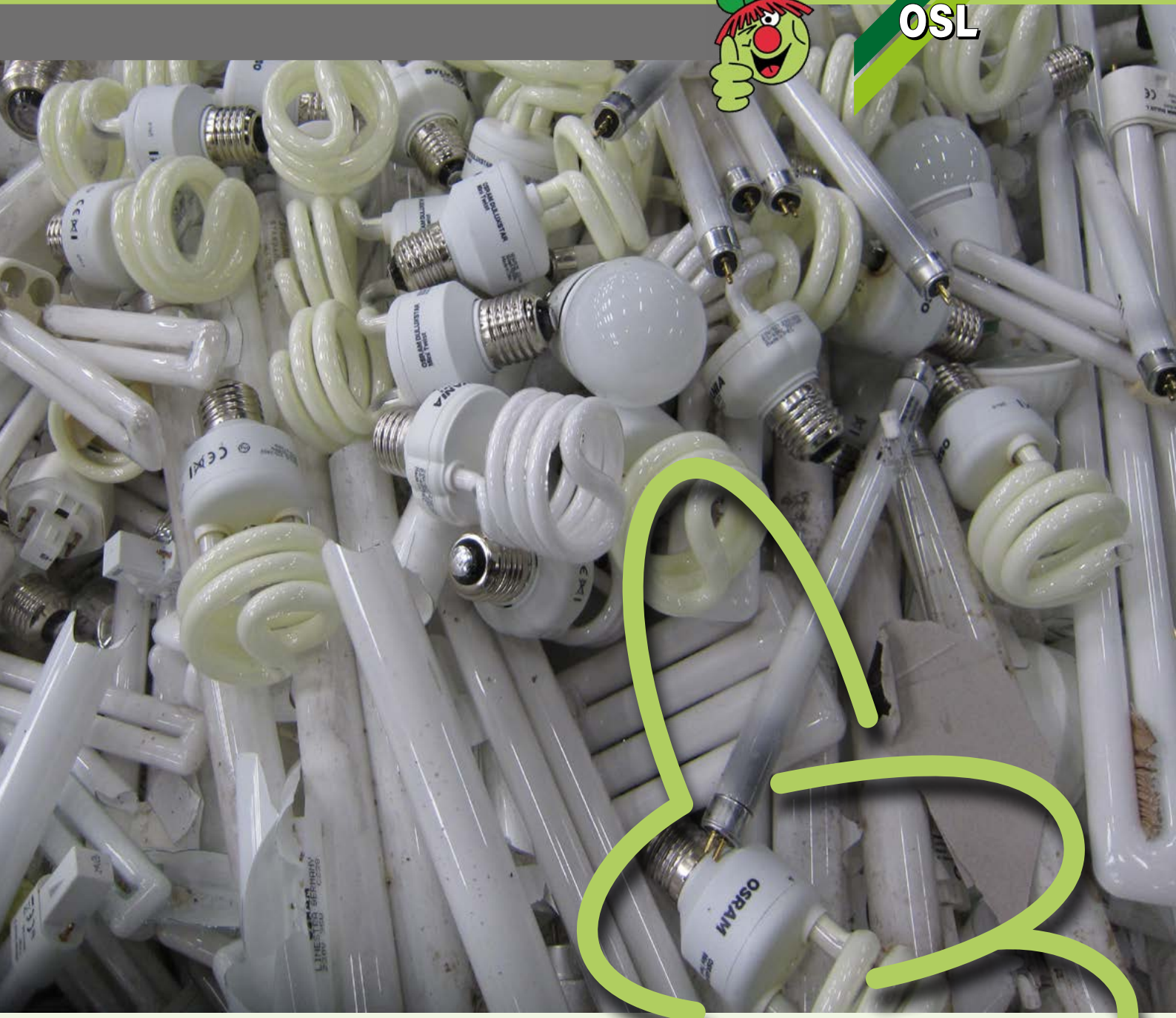
www.sdk.lu

The social media presence, launched at the end of 2019, was further developed and has now become well-established. In June 2023, **SDK** launched a newsletter aimed primarily at affiliated businesses and institutions.

In 2021, the Environmental Administration introduced the national waste app, which allows citizens to find out about all collection systems and dates in their local area. Naturally, **SDK** is also represented here.

SDK's social media channels





5.
SOLUTIONS FOR THE CIRCULAR ECONOMY AND SUSTAINABLE CONSUMPTION

5. SOLUTIONS FOR THE CIRCULAR ECONOMY AND SUSTAINABLE CONSUMPTION

5.1. Circular Economy and Resources

Building on existing expertise, the strategy of the **SuperDrecksKëscht® campaign** aims to evolve traditional waste management into a circular economy. Under the concept of circular consumption and circular production, waste products are collected cleanly and directly, thereby better preserving their value than in traditional mixed waste collections. The resource potential tool plays an important role in this (see section 5.4).

In addition to re-consumption and re-production, the 'smart' concepts of the **SuperDrecksKëscht® campaign** ('**Shop Green**', '**Repair & Share** ') focus on the reuse of products and the use of eco-friendly products. Another aspect is further development with regard to the intelligent design of new products ('ecodesign').

To further develop the strategy, the **SDK** also works with Luxembourg's municipalities and regions to promote innovative concepts and transition waste management into a circular economy/resource economy.

The **SDK**'s activities are fully in line with the 'Zero Waste Luxembourg' strategy presented by the Ministry of the Environment in September 2020, which aims to reduce non-recyclable residual waste to zero.

↓ **SDK Logistics Centre**

SUSTAINABILITY AND THE ECONOMY

The activities of the **SuperDrecksKëscht® campaign** play an important role in the 2018 National Plan for Waste Management and Resources, as well as in the 3rd National Sustainability Plan of 2019, which takes into account the United Nations (UN) Sustainable Development Goals (Agenda 2030).

This concerns, for example, assisting in the development and promotion of Luxembourg as a location for environmental technology companies and service providers, the prevention of toxic waste generation, the reduction of the economy's vulnerability to fluctuations in resource prices, or the development of scenarios to assist decision-makers ('post-growth economy').

5.2. Product handling and product flows - from collection to treatment

PRODUCT FLOWS

In 2025, the product handling lists, which map the product flows at **SDK** from the collection point via the logistics centre to dispatch to the recipient, were again reviewed and updated.

LOGISTICS CENTRE

In the field of transport and warehouse logistics, Aktion SuperDrecksKëscht® has in recent years developed specialised vehicles and logistics solutions, particularly for the collection and transport of problematic products.

→ Logistics/vehicles:

The truck fleet was renewed in 2017/2018 and replaced with more environmentally friendly and lower-emission vehicles (Euro 6d temp). A new Oleocont body, designed to optimise the collection of oil-contaminated products, oil and diesel filters, as well as ink-stained paper and films, was put into operation in 2021.

→ Treatment and further processing of waste products (recycling):

Further optimisations were carried out in 2020. For instance, a receiving device for the direct tipping of plastic pallets was integrated into the existing sorting conveyor. At this facility, Ligue HMC staff, amongst others, check incoming used candles for foreign matter before they are sent to the recipient, Kaërzefabrik Peters, for the production of an outdoor candle.

As part of the collaboration with Peintures Robin, used water-based paints are sorted for the manufacture of a new product. These have been marketed under the name RobinLoop since the second quarter of 2021.

To make optimum use of the pallet storage space in the block storage area, some waste products have been stored on two-tier metal stanchion pallets since 2021/2022. Waste products in big bags, such as CDs and plastic regrind, can also be stored on two tiers using the stanchion pallets. The modular design of the metal stanchion pallets, consisting of an upper and lower section as well as stanchions in various lengths, allows for flexible adaptation to different applications (e.g. collection of Eternit/asbestos cement using 1 m stanchions, storage of PU foam cans using 2.5 m stanchions).

↑ Paints and Varnishes – Sorting

↓ Inspection and packaging

→ IT expertise / digitalisation

The further developed, partly reprogrammed warehouse management system went live on 1 January 2021. The entire movement of incoming products is fully traceable via barcode right up to delivery to the recipient.

As part of further optimisation, time and attendance recording was structured and digitised in 2020, broken down by work areas and activities. This makes it possible to analyse the individual return processing procedures in detail for potential optimisation and to improve workflows.

Further steps towards digitalisation were taken with the aim of optimising processes and reducing paper usage. In particular, digitalisation was consistently developed in the area of **SDK** consulting for operators, and consultants can now work largely paper-free.

→ Volumes processed

In 2025, 4,588.0 tonnes of valuable and problematic products were received at the logistics centre. In 2024, the figure was 4,555.9 tonnes. The volume has therefore risen slightly, by 0.7%. In 2025, 4,552.3 tonnes were transported from the logistics centre to the product recipients. In 2024, the figure was 4,571.5 tonnes, representing a decrease of 0.4%. The volumes are therefore very stable.

Stock levels as at 31 December 2025 stood at 600.8 tonnes. The monthly average was approximately 600–700 tonnes, meaning the stock turnover rate was around 6–7.

The plan is to maintain stock levels at 600–700 tonnes; a further reduction in stock is hardly feasible due to the product diversity and the need to maintain economically and ecologically viable transport volumes (full lorry loads; charges).

QUALITY ASSURANCE BY THE SDK LABORATORY

The number of samples for ‘products’ and ‘unknown products’ in 2025, totalling 2,061 samples, remained at the level of previous years (2024: 2,297). Generally, the total number is non-cyclical.

The largest category continues to be the sampling of waste oils, with 1,560 samples (2024: 1,553 samples). Solvent sampling stood at 304 (447 samples in 2024).

The main task in the aforementioned sampling was to check the quality parameters with regard to recyclability as well as recipient parameters (limit values). For non-recyclable products, particular attention was paid to parameters relevant to the transport of dangerous goods (ADR regulations) and those to be observed by the product recipient in the context of safe and environmentally sound recovery/disposal.

The number of analyses of indoor air/radioactivity and special batches, at 6,636, was significantly lower than the previous year’s figures, due to the reduced number of necessary radioactivity checks.

Support for resource centres in the proper conditioning and declaration of laboratory chemicals, as well as the development of laboratory concepts for problematic products with specific collection structures for schools and research centres, was continued.

As part of the **SDK fir Betriber**, in 2025 laboratory staff conditioned special batches of hazardous substances for 82 customers (previous year: 74), drew up and updated concepts, and sampled 215 products (previous year: 204).

5.3. Cooperation partners and reprocessing companies

COOPERATION PARTNERS

As part of the **SDK fir Betriber**, the **SDK** offers advice and training to all authorised waste collectors holding a transport, dealer or broker licence. Collectors have the opportunity to sign a cooperation agreement and thus apply for the **SDK** label for collectors. In 2025, of the 20 cooperation partners who had signed an agreement with the **SDK**, 9 had been awarded the **SDK** label, all with a certificate (having held the label for 5 years or more).

Cooperation partners who have not yet met the label's criteria are to continue to be supported, with the aim of achieving the quality standards and being awarded the label. To this end, further training measures are also offered. Facilities that have their end-of-life products disposed of by label-awarded cooperation partners are thus guaranteed that these are treated in accordance with the latest state-of-the-art technology in terms of recycling and resource conservation.

REPROCESSING COMPANIES

Product recipients are assessed in accordance with the requirements of the EU hierarchy of treatment methods and the **SDK** Environmental Code, whilst taking into account the concept of resource potential.

Only product recipients who meet the requirements and thus handle the products in line with a sustainable and resource-efficient economy (circular economy) are eligible.

The assessment is carried out following an inspection of the premises and a review of permits, certificates and other relevant documents.

SDK representatives visited 58 product recipients/suppliers during 2025. Topics included resource potential/assessment of product recipients and general issues such as climate protection. In addition, there were 35 meetings with product recipients or cooperation partners at the Colmar-Berg site, including online conferences. The calculation of resource potential according to the **SDK** concept has been updated as far as possible.

↓ **Recycling of PU foam cans at the reprocessing company PDR (Photo: PDR)**

5.4. Resources potential

The ‘resources potential’ concept – initially called ‘product potential’ – developed in the first phase with the State Research Centre (now LIST) allows the recovery and disposal processes (reproduction processes) at the waste recipient (product recipient) to be assessed and evaluated in terms of circular economy and resource efficiency. The assessment process has been certified to the ISO 14024 standard since July 2015.

Unlike traditional recycling rates, this calculation method takes into account the output streams from treatment facilities. This leads to the disclosure of all product streams and promotes transparency regarding recovery and disposal routes. For data collection, the treatment plant must provide detailed information on the individual output fractions. A colour-coded distinction is made when calculating the resource potential.

A key advantage of the **SuperDrecksKëscht® campaign** calculation method is that different treatment methods for an identical product can be compared with minimal effort, as only the output streams are taken into account for presentation via pie charts. The treatment facility with the highest raw material utilisation – i.e. where material recycling is the primary focus – can thus be quickly identified.

As of 31 December 2025, a total of 133 reprocessing processes at 47 partners of the **SuperDrecksKëscht® campaign** and other stakeholders had been certified. In addition, three Luxembourgish manufacturers of new products – Peintures Robin SA, Käerzefabrik Peters and Geobloc SA – have been certified for using end-of-life products in the production of new goods.

5.5. Re-Use and SDK Circular products

In general, the **SuperDrecksKëscht® campaign** supports projects such as Ecotrel’s Social-ReUse wherever possible. Several projects have also been launched over the past two years. In some cases, collection schemes have been set up for products that were previously not accepted; in others, ways are being sought to channel more products into reuse.

COLLECTION OF USED GLASSES

As part of the collection of medicines, used glasses have repeatedly ended up at the **SDK**. Since 2019, in collaboration with resource centres and opticians in Luxembourg, glasses have also been systematically collected and processed via the logistics centre by ‘Brillen weltweit’. ‘Brillen weltweit’ is a charitable initiative that forwards used glasses, following a professional quality check, for humanitarian purposes around the world.

In 2025, around 384.7 kg – equivalent to approximately 12,800 pairs of glasses – were collected.

COLLECTION OF USED CANDLES

As part of the collection of problematic products, candle remnants were also repeatedly delivered to the **SDK**, and enquiries were received from members of the public regarding how used candles should be disposed of. As early as 2019, therefore, the possibilities for reusing old candles were explored in collaboration with the Luxembourg-based candle manufacturer Peters. Once it was confirmed that they could be reused in new products such as torches or fire bowls, 4.59 tonnes were collected as early as 2019. In 2022, the figure was 8.41 tonnes, in 2023 7.73 tonnes, in 2024 8.71 tonnes and in 2025 8.79 tonnes.

Since autumn 2021, Käerzefabrik Peters has been offering an outdoor candle produced using used candles from the **SDK fir Bierger**'s collection and bearing the **SDK**-Circular label. In 2025, this was supplemented by a further outdoor candle with a longer burn time. Of the 8.8 tonnes delivered to the candle factory in 2025, 98.07% could be used for production.

JOINT PROJECT WITH PEINTURES ROBIN ON THE USE OF WASTE PAINT

↑ RobinLoop

As part of the partnership with Peintures Robin (linking to the **SDK fir Betriber**, resource potential for the Verdello product), a joint project was launched to reuse waste paint from the **SDK fir Bierger** collection in the production of new paints. Following tests and quality checks, the product RobinLoop, which bears the **SDK**-Circular label, was launched on the market. This took place in the summer of 2021. 2.26 tonnes of suitable waste paint were sent to Peintures Robin in 2022. However, due to a lack of demand for the product, no waste paint has been supplied to Peintures Robin since then. The project is set to be resumed in 2026 and promoted by Peintures Robin.

JOINT PROJECT WITH THE LUXEMBOURG TENNIS FEDERATION

Following a joint pilot project with the municipality of Schifflange, which began in 2018, tennis balls have been collected since 2022 in collaboration with the Luxembourg Tennis Federation (FLT).

The process consists of several phases: collection of the balls at tennis clubs, shredding at a specialised facility to recover rubber granulate for the manufacture of new tennis balls.

In 2025, four more clubs joined the scheme, bringing the total number of participating clubs to 38 by the end of 2025. Each club has a recycling box for used balls on its premises, which is regularly collected by the SuperDrecksKëscht® initiative.

The quantity of tennis balls collected rose to just under 2.9 tonnes in 2025; with an average weight of 57 g, this corresponds to approximately 50,285 balls.

OEKO-PUR

OEKO-Pur, obtained during the recycling of refrigeration appliances, consists of polyurethane from which CFCs and VOCs have been removed during the recycling of old refrigeration appliances. This prevents these substances from being released and thus endangering the climate. Every kg of **OEKO-Pur** thus prevents 250 kg of climate-damaging CO2 emissions. **OEKO-Pur** is an excellent binding agent for oil and other organic liquids such as solvents, brake and coolant fluids, paints and varnishes, etc. It is available on the market in three different grades (powder, granules, fine granules).

In general, **OEKO-Pur** remains in demand as a circular economy product. The awareness of clean working practices and the prevention of incidents, achieved through consultancy, contributes to responsible consumption. All three products (Plus, Compact and fine granules) are used specifically according to their different areas of application. As part of customer support, **OEKO-Pur** is specifically promoted to fire brigades, Civil Protection, Ponts et Chaussées, local authorities and other organisations.

END OF WASTE STATUS FOR VARIOUS PRODUCTS

At the request of the **SDK/OSL**, the Environmental Agency has approved product status for certain products handled via the **SDK**. This means these products are no longer considered waste. The decisive factor here was the quality control carried out during the processing/sorting of the collected products. This applies, for example, to the candles and glasses mentioned above, but also to pallets for reuse, pallets for repair or packaging aids (chips).

5.6. Sustainable consumption

Household consumption in Europe is responsible for around a quarter of greenhouse gas emissions. The **SDK** therefore systematically promotes sustainable consumption and supports consumers through campaigns, labelling and education.

5.6.1. Shop Green

With the **“Shop Green** – Your label for sustainable products in Luxembourg” campaign, the **SDK** aims to make environmentally friendly and low-waste products visible in shops and to support consumers in making sustainable purchasing decisions. Consequently, the selected products are promoted in participating supermarkets and specialist shops with the **“Shop Green”** label.

By the end of 2025, the number of participating shops stood at approximately 150, due to the takeover of a retail chain by another operator and the resulting change in product range. As in previous years, updates and adjustments to the criteria and documents were made in 2025. Since the end of 2020, market analyses have been carried out to determine the proportion of **Shop Green** products out of the total number of products on offer in the individual product categories, and to assess the level of knowledge among staff in the participating supermarkets and shops. In 2025, staff training in the retail sector was again conducted by the **SDK** Academy. The analyses serve as a basis for further developing the project.

The following product groups are assessed and promoted as part of the campaign:

- environmentally friendly paints, varnishes and glazes
- rechargeable batteries and chargers
- eco-friendly detergents and cleaning products for domestic and
- commercial use
- energy-saving and long-lasting lighting
- eco-friendly school and office supplies
- personal care products (rinse-off products)
- hygiene paper

Products are generally assessed on the basis of questionnaires completed by the manufacturer, safety data sheets and product information sheets, as well as other information provided by the manufacturer. The criteria are continuously adapted to the respective product groups on a case-by-case basis. The assessment of detergents and cleaning products, paints and varnishes, and rinse-off products is carried out by the partner organisation Energy and Environment Agency Lower Austria/'umwelt-beratung' Vienna.

Recommendations for use regarding the individual product groups and information leaflets round off the '**Shop Green**' awareness campaign.

In 2025, too, there were ongoing exchanges with the campaign's partners, particularly from the retail sector. The website www.shop-green.lu is continuously updated and offers interested consumers a wealth of information: a list of participating shops, criteria catalogues for the individual product groups, lists of positively rated products, usage recommendations, information leaflets, etc.

In 2025, the '**Shop Green**' campaign was also regularly featured in newspaper articles and publications such as the ULC's 'de Konsument'.

5.6.2. Repair&Share

As early as 1999, a brochure was published in collaboration with the then Oeko-Fonds (now Oekozenter Pafendall), listing businesses and organisations offering repair ('Flécken') and hire ('Léinen') services. This project was revived in 2018 as an online platform. The overarching 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. In 2022, 'Flécken a Léinen' was renamed **Repair & Share**. The reason for this was to appeal more strongly to citizens who do not speak Luxembourgish.

In 2021, the project was further developed. A concept was drawn up to make the website more attractive to both businesses and consumers.

As of 31 December 2025, 123 businesses offering repairs and 33 businesses offering a hire service were registered with **Repair & Share**.

In addition to the Administration de l'environnement, the Chambre des Métiers and the Chambre de Commerce, partners include the Oekozenter Pafendall, Ecotrel asbl and INDR. The **SDK** maintains close contact with other national stakeholders such as Repair Cafés Lëtzebuerg.

5.6.3. Clever iessen (ECOBOX)

The **ECOBOX** is a reusable container available in two sizes (500 ml and 1000 ml), which allows food from restaurants, canteens, takeaways and other establishments offering food to be taken away to be eaten later at the office or at home. In addition, a reusable cutlery set is offered to avoid single-use cutlery.

The campaign to promote the reusable container launched in June 2018 and has continued to develop very positively in 2024.

As of 31 December 2025, 137 restaurants, 163 canteens/school canteens and 26 other institutions had joined the scheme. 41,674 500 ml containers and 122,733 1000 ml containers – totalling over 160,000 – as well as 2,332 cutlery sets were in circulation by that date. The project is part of the Luxembourg government's strategy against food waste and single-use packaging and is run under the auspices of the Ministry of the Environment, Climate and Sustainable Development and the Environment Administration (Administration de l'environnement) in collaboration with HORESCA. There are now other reusable containers on the Luxembourg market (such as Luloup/Vytal and Mubowl) which are also promoted by the **SDK**.

The SuperDrecksKëscht® initiative is responsible for the operational implementation, i.e. the distribution and management of the containers, as well as supporting participating businesses and institutions and dealing with enquiries from private individuals.

The **ECOBOX** is managed in accordance with the principles of the circular economy and resource potential. Containers that can no longer be used are taken back by the **SDK** and sent to the manufacturer for the production of new secondary raw materials.

5.6.4. Sustainable events – Green Events

In 2019, the **Green Events** project was launched, a project of the Ministry of the Environment in collaboration with the Oekozenter Pafendall and the **SuperDrecksKëscht® campaign**.

The aim is to promote sustainable initiatives in the events sector and to raise their profile. Furthermore, the project aims to encourage and promote the conservation of natural resources (circular economy approach) and to reduce CO_2 emissions. Within the framework of sustainable events, cooperation between local authorities and

↓ Attendance at the Energy Days in Mondorf-les-Bains

associations is also to be supported. The target group comprises all types of events (festivals, musical, cultural and/or sporting events) organised by associations, clubs, federations, municipalities, nature parks or ORTs (Office Régional du Tourisme).

To support organisers who commit to a sustainable approach, the Ministry of the Environment, Climate and Sustainable Development awards the '**Green Events**' and 'Mir engagieren eis' logos to environmentally responsible events. The criteria for the logos are set out in the '**Green Events**' checklist. This serves as a guide and framework for organising environmentally responsible events. To receive the '**Green Events**' logo, the event must meet all the mandatory criteria on the checklist. The 'Mir engagieren eis' logo can be awarded if the event meets at least half of all criteria (mandatory and optional).

In 2025, 199 events were awarded the "Green Event" label and 3 the "Mir Engagéieren eis" label. In total, 242 consultations on events took place in 2025, 86 of which were conducted by the **SDK** and 156 by the Oekozenter Pafendall.

Following the Oekozenter Pafendall's termination of its agreement with the Ministry of the Environment on 31 December 2025, the EBL (Ëmweltberodung Lëtzebuerg) will be the new lead partner for **Green Events** from 1 January 2026.

6. OUR SERVICE FOR RESIDENTS, LOCAL AUTHORITIES AND BUSINESSES

6. OUR SERVICE FOR RESIDENTS, LOCAL AUTHORITIES AND BUSINESSES

6.1. The SDK fir Bierger (for Residents)

6.1.1. Volumes and suppliers

The total volume recorded by the **SDK fir Bierger** in 2025 was 3,064.8 tonnes. This represents an increase of 1.7% compared with 2024. The population rose by approximately 1.5% to 681,973 people over the same period. The recorded volume of problematic products per year and inhabitant remains at approximately 4.49 kg. This figure is generally positive, a view confirmed by the results of the national residual waste analysis.

The results of the national residual waste analysis carried out in 2021/2022 were available in early 2023 and showed that the absolute quantities of problematic products still found in residual waste had halved from 1.93 kg to 0.92 kg compared with the 2018/2019 analysis. The decline is therefore clearly attributable to prevention measures and demonstrates the success of the awareness-raising and information campaigns.

A further residual waste analysis was carried out in 2025. The results will not be available until early 2026. They will continue to serve as the basis for new product-specific campaigns on prevention and separate collection. The aim is to further reduce the quantities disposed of via residual waste.

The number of people using the mobile collection points in 2025 was 51,910, a decrease of 2.54%.

6.1.2. Collection systems

With its Service Centre, short-term drop-off points and door-to-door collections, the **SuperDrecksKëscht® campaign** has a system that is highly flexible in terms of time and location, meets the needs of residents and is well received.

→ SERVICE CENTRE

The Service Centre is a modern mobile recycling collection vehicle. Collection costs, the number of vehicle movements, transport emissions and fuel consumption per tonne-kilometre are at a satisfactory level.

→ DOOR-TO-DOOR COLLECTION

In 2025, modern small vans were in use for the door-to-door collection. These meet the latest safety requirements and are equipped with SAPs, drums and plastic paloxes, so that products can be sorted directly and the containers exchanged at the Service Centre. As in previous years, door-to-door collections were carried out in around two-thirds of Luxembourg's municipalities.

→ RESOURCE CENTRE (PERMANENT COLLECTION POINTS/TECHNICAL SERVICES)

In the municipalities of Wormeldange, Manternach and Mertert, mobile collections of hazardous waste took place once a month, alongside the collection of recyclable materials by the municipalities' technical services. In the municipalities of Mondorf-

↑ The product range

↓ The Service-Centre

les-Bains, Echternach and Rosport/Mompach, collections took place twice a month. Residents of the municipalities of Grevenmacher, Flaxweiler/Lenningen and Betzdorf have the opportunity to hand in recyclable and hazardous waste at the collection point at the Buchholtz-Muertendall landfill site on two Saturdays a month.

→ RECYCLING CENTRES/RESOURCE CENTRES (PERMAMENT COLLECTION POINTS)

Residents currently have access to 20 fixed collection points in resource centres. In 2025, the volume of hazardous waste collected stood at 2,433.6 tonnes, representing a 2.3% increase on the previous year. Thanks to expert guidance and support, the quality of collection remains at a high standard.

→ COLLECTION SERVICE / VIA PARTNERS / DIRECT DELIVERY

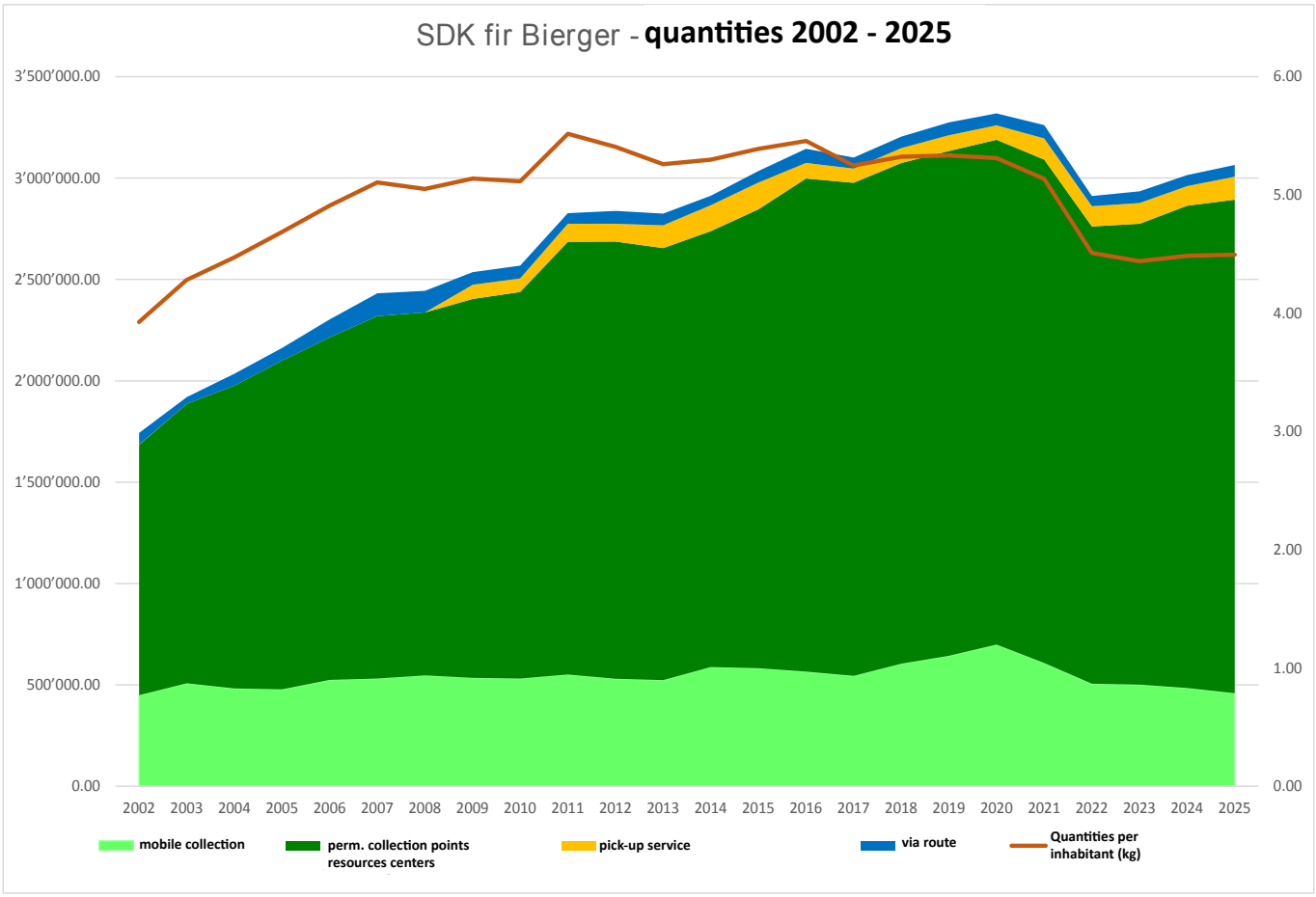
The collection service has continued to gain importance in the commercial sector (retail, pharmacies) thanks to joint product-specific campaigns. In 2025, 171.7 tonnes were collected via the collection service, via partners and through direct delivery.

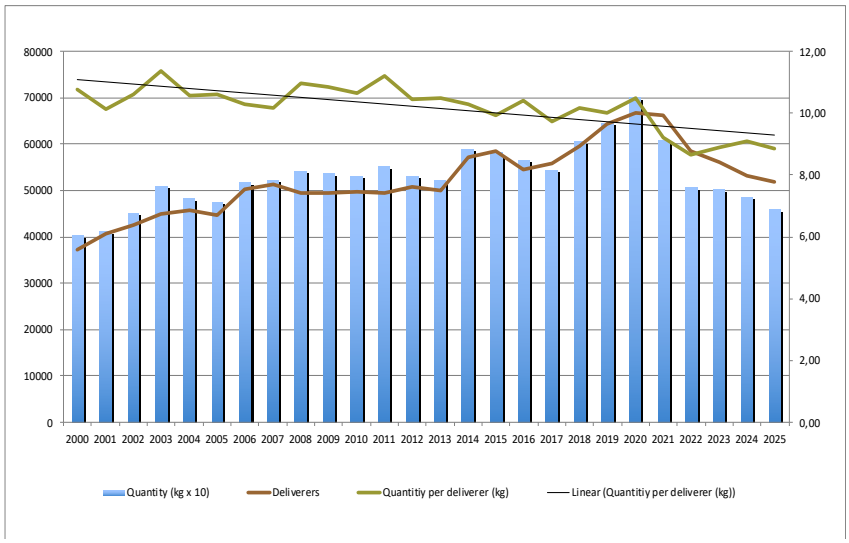
→ MINI COLLECTION POINTS IN RETAIL OUTLETS

In collaboration with Ecotrel asbl and Ecobatterien asbl, collection cabinets and collection points have been set up in various supermarkets and DIY stores.

↑ Permanent collection point

↓ Problem products collected from private households 2002–2025
Left scale / bars: Quantity in kg
Right scale / line: Quantity per inhabitant per year





↑ SuperDrecksKëscht® fir Bierger - Total volume of mobile collections / Delivery points / Volume per delivery point (in kg) 2000–2024

↑ Door-to-door collection

6.1.3. Products

Of the more than 100 different products, a few are highlighted here.

→ LIGHTERS

In 2025, 1,955.9 kg – equivalent to around 162,000 gas lighters – were collected. This represents an increase of 2.0% compared to the previous year.

→ MEDICINES

Information materials were also distributed in 2025 via pharmacies, GP practices and veterinary surgeries. Information was provided, amongst other places, in an issue of the Luxembourg pharmacy customer magazine 'Letz be healthy' as well as in 'de Konsument'.

The volume of medicines collected rose again by 6.1% to 222.0 tonnes compared with the previous year. The annual per capita figure also rose significantly to 332.5 g. Of this, 40.25 tonnes, equivalent to 18.1%, were collected via pharmacies. Collection in pharmacies continues in partnership with the Syndicat des pharmaciens and CPL. Despite a general decline in the proportion of problematic products in the 2021/2022 residual waste analysis, relatively large quantities of medicines remain in residual waste.

Efforts to promote the separate collection of medicines and the options for disposal via pharmacies, resource centres or the mobile collection service of the **SuperDrecks -Këscht® campaign** will continue at an intensive level.

↓ Medicine collection at pharmacies

→ PRESSURISED GAS CYLINDERS AND CONTAINERS

In 2025, 78.1 tonnes were collected. This is again 18% more than in the previous year and more than double the figure from 2017. The volume of helium gas (balloon gas) has once again increased significantly. The volume rose again by 2.3 tonnes to 23.3 tonnes. The quantity of recorded nitrous oxide gas cartridges was still negligible in 2022 at 93.5 kg, 'exploded' to 2.24 tonnes in 2023, tripled to 6.26 tonnes in 2024 and now stands at 12.56 tonnes in 2025. This is apparently primarily attributable to so-called 'nitrous oxide parties' where the gas is consumed as a party drug. Public awareness campaigns regarding helium and nitrous oxide are therefore being further intensified.

The quantity of propane gas cylinders (including camping gas) also rose significantly and, at 32.6 tonnes, was 6.4% above the previous year's level (30.6 tonnes). CO_2 gas cylinders are also still being returned; in 2025, this amounted to 1.7 tonnes. Despite existing deposit schemes, the return options at the resource centres and via the **SDK**'s mobile collection service are thus still being used extensively.

Propane gas cylinders are sent to the Luxembourg-based refiller PrestaCylinders, where they are recycled where possible. The recent resource potential certification for the recycling of these cylinders at PrestaCylinders showed a raw material utilisation rate of around 96%.

→ MERCURY IN HOUSEHOLDS

In 2025, 124.2 kg of mercury-containing products were collected from households, of which 29.8 kg were mercury thermometers. In 2024, the figure was 87.1 kg, and in 2023, 59.2 kg. Although mercury-containing products are no longer permitted to be sold for domestic use, significant quantities of such products remain in households. The amount in 2025 actually rose significantly again.

→ KITCHEN FATS AND OILS

In 2025, a total of 503.4 tonnes of cooking fats and oils were recorded via **SDK fir Bierger** and **SDK fir Betriber**, compared with 506.23 tonnes in 2024 – so almost the same quantities.

Of the quantities processed in 2025 – 468.5 tonnes – 81.84% were used for biodiesel production, 6.13% were used directly in the **SDK**'s heating plant, and 12.03% went into substitute fuel production.

Lorries and commercial vehicles, as well as some passenger cars, continue to use biodiesel. The central heating system at the site continues to be operated directly with used kitchen oil as far as possible. In 2025, this accounted for 76.6% (see 6.2 Energy consumption).

To optimise the use of used kitchen oil ecologically and economically in line with the circular economy, the German REDcert certification system has been in use since 2014. The system certifies sustainable biomass use in accordance with the German Biomass Sustainability Ordinance and is now also recognised across Europe by the European Commission. Within this framework, all product streams are meticulously documented and processed separately according to origin (distinguishing between cooking fats of plant and animal origin; see also www.redcert.org).

↑ Use of gas cylinders

↓ Collection bin for kitchen fats and oils

→ SYRINGES AND CANNULAS

The quantity of syringes and cannulas recorded increased once again. In 2025, 28.48 tonnes of syringes/cannulas were recorded, compared with 27.75 tonnes in the previous year. In 2025, 50,734 safety containers were delivered (previous year: 45,004).

The vast majority of syringes and cannulas were delivered in special containers; only a small percentage were packed in other containers.

↑ Syringes and needles – the special container must be sealed tightly after use

→ TONER CARTRIDGES AND INK CARTRIDGES

Since 2020, toner cartridges and ink cartridges have been handled by our partner Return, which guarantees transparent product flows during refilling. In 2025, 33.8 tonnes of toner cartridges and ink cartridges were recorded via the **SDK** for citizens. This is 5.1% less than in 2024.In total, including **SDK fir Betriber**, 48.1 tonnes were collected. In 2025, a significant proportion of these was again sent for refilling or recycling.

→ DRY-CELL BATTERIES AND HIGH-ENERGY ACCUMULATORS

Since 2010, the national collection of batteries has been coordinated by Ecobatterien asbl, within the framework of product responsibility for manufacturers and importers.

The quantity of dry batteries collected from private households rose again by 5.1%, following a 4.3% increase in the previous year (2023 to 2024). In 2025, the quantity collected was 111.6 tonnes. There was also a significant increase in high-energy batteries of approximately 10% to 13.85 tonnes. For the **SDK** for businesses, there was a significant reduction of 16% in dry batteries to 42.2 tonnes, and a significant increase of 63% in high-energy batteries to 37.5 tonnes. This amounts to a total of 205.2 tonnes (previous year: 192.1 tonnes). The 2022 residual waste analysis estimated that only 13.2 tonnes remained.

The collection rate in Luxembourg is therefore very high. The overall increase in volumes is attributable to the growing use of battery-powered products. Consequently, in line with the new legislation (European Battery Regulation), high-energy accumulators have been reclassified into the three categories of portable batteries, industrial batteries and LV (for light vehicles) for collection and processing.

The collection logistics system introduced in 2003 in collaboration with the retail sector, featuring the 30-litre container for dry batteries, has proven its worth.

To ensure adequate safety in view of the increasing proportion of high-energy accumulators (risk of overheating/fire hazard in the event of short circuits), a safety concept was introduced at the end of 2019 in collaboration with Ecobatterien asbl, which guarantees the separate handling of lithium batteries. By the end of 2025, containers had been placed at 316 locations in retail outlets and public buildings.

In general, Ecobatterien, acting as a tool for retailers and manufacturers, communicates extensively about the correct handling of used batteries and carries out awareness-raising campaigns and measures. As part of the **'Shop Green'** campaign, rechargeable batteries and chargers have been specifically promoted in shops since January 2007.

↓ Information sheet on the security concept

Rückmeldung: Sicherheitskonzept für die Sammlung von Trockenbatterien

Lithiumbatterien/-akkumulatoren wie sie z.B. in Smartphones oder Laptops verwendet werden, bergen ein nicht unwesentliches Risiko sich z.B. aufgrund von Defekten selbst zu entzünden und somit Brände zu verursachen. Auch wenn diese vermeintlich ‚leer' sind und ausgetauscht werden müssen – ihr Energieinhalt ist immer noch so hoch, dass z.B. durch Kurzschluss mit anderen Batterien Brände entstehen können.

Die Sammlung der Trockenbatterien in Systembehältern kann laut Sicherheitskonzept von **Ecobatterien ASBL** und **SuperDrecksKëscht**' daher nur unter folgenden Vorgaben erfolgen:

- **Die für die Betreuung verantwortlichen Personen haben an einer Sicherheitseinweisung/Schulung teilgenommen.**
- **Tägliche Kontrolle der Systembehälter durch eine geschulte/eingewiesene Person**
- **Abkleben der Pole von Lithiumbatterien wie Laptop- und Smartphone-Akkus**
- **Befüllung des Behälters mit feuerhemmendem Isolationsmaterial (Vermiculite)**

Die korrekte Handhabung von Hochenergieakkus/Lithiumakkus wird Ihnen anschaulich auch im über Youtube abrufbaren Video gezeigt: Über nebenstehenden QR-Code gelangen Sie direkt zum Video.

https://youtu.be/iEkMvcwwYmU

Falls Sie bereit sind, die Batteriesammlung nach den oben aufgeführten Vorgaben einzuhalten, dann teilen Sie uns dies bitte per E-Mail an Ihre(n) Berater(in) oder an Frau Ludwig (nancy.ludwig@sdk.lu) mit.

☐ Wir möchten uns an der öffentlichen Sammlung von Trockenbatterien beteiligen und sind bereit, die oben aufgeführten Vorgaben zu befolgen.

Betrieb | Kundennummer | Kontaktperson | Datum | Unterschrift

Weitere Fragen beantwortet Ihnen gerne Ihr Berater/Beraterin.

SDK SuperDrecksKëscht® RESSOURCEN INNOVATIOUN NOHALTEGKEET CIRCULAR ECONOMY

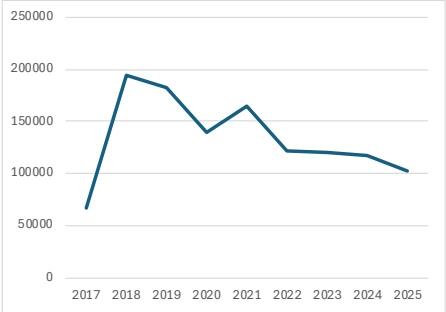
ecobatterien

Version française au verso

→ RAILWAY SLEEPERS AND TELEPHONE POLES

Due to their weather resistance, discarded railway sleepers were often used by private individuals in gardens, for slope stabilisation, as garden edging, etc. These are usually treated with creosote, a tar oil. This biocide is classified as carcinogenic. At the request of citizens and local authorities, telephone poles were subsequently included as well.

The **SDK fir Bierger** therefore began collecting railway sleepers from private households in mid-2017, thereby removing these environmentally hazardous waste materials from the environment. In 2025, 102.2 tonnes were disposed of. As the adjacent graph shows, the volume appears to be slowly declining. However, it is evident that significant quantities of this waste material are still in use.

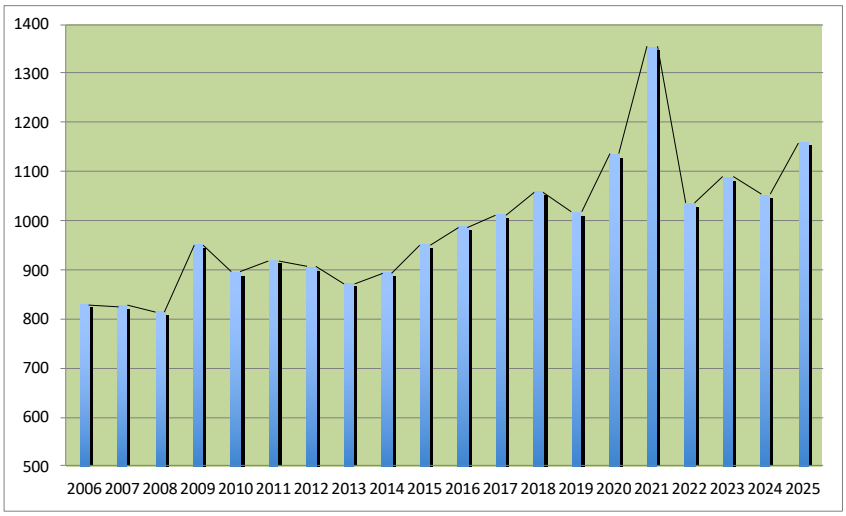


↑ Total weight of railway sleepers collected since 2017, in kg.

→ REFRIGERATORS AND AIR CONDITIONING UNITS

The **SuperDrecksKëscht® campaign** is the agent for the national take-back scheme for the collection and recycling of electrical and electronic waste, Ecotrel asbl (see point B.2).

In 2025, 1,158.3 tonnes of refrigeration units, air conditioning units and dehumidifiers were collected, with an average weight of 45 kg per unit, corresponding to a total of 25,741 units. This represents a significant increase of 9.95% compared to the previous year.



↑ SuperDrecksKëscht® fir Bierger/Ecotrel - Number of refrigerators collected (in tonnes) 2006 - 2025

Commercial refrigeration units and display cabinets, as well as air conditioning units and drinks vending machines, were also collected and sent for environmentally sound treatment to a RAL-certified product recipient. In 2025, 5,947.5 kg of refrigerants were collected via the **SDK fir Betriber**, significantly more than in the previous year.

The collection points in the resource centres are equipped with special containers in accordance with the quality criteria of RAL-GZ 728

↓ Even CFC-free refrigerators must be disposed of in a specific manner.

At the product recipient SEG-Umweltservice in Mettlach/Saar, Stage 1 and Stage 2 recycling is carried out in a modern recycling plant on an industrial scale and is therefore highly efficient and cost-effective.

The recycling of refrigeration appliances is carried out in accordance with the strict criteria of the RAL Quality Association. This covers older refrigeration appliances still containing CFCs, as well as VOC-containing appliances and those using other refrigerants such as ammonia. The environmentally friendly and climate-friendly treatment is carried out in accordance with the DIN EN ISO 50574 standard.

CO_2 emissions are reduced during the recycling of refrigeration units through the recovery and subsequent environmentally sound destruction of ozone-depleting and climate-damaging substances, as well as the recycling of recovered metals and plastics into secondary raw materials. This is recognised by the RAL-CO_2OLprint calculation method.

Contacts with local authorities and other customers were also maintained intensively in 2025, in coordination with Ecotrel asbl.

The **SuperDrecksKëscht® campaign** informs the public about the prevention and recycling of various product groups within the category of climate-damaging and ozone-depleting products.

As a partner of the oekotopten campaign, the SuperDrecksKëscht® initiative contributes to the promotion of energy-saving and climate-friendly refrigeration appliances. As part of the partnership with Ecotrel asbl, the topic of refrigeration appliances and climate protection was continuously communicated in public relations work.


RAL-Zertifikat
Nr. 04/2025

RAL GÜTEZEICHEN

Die RAL-Gütegemeinschaft
Rückproduktion von Kühlgeräten e.V.
verleiht hiermit aufgrund des ihrem Güteausschuss
vorliegenden Prüfberichtes vom 10.09.2025
dem Antragsteller

Aktion SuperDrecksKëscht®
Oeko-Service Luxembourg S.A.

das vom RAL Deutsche Institut
für Gütesicherung und Kennzeichnung e.V.
anerkannte und geschützte Gütezeichen.

„Rückproduktion von Kühlgeräten"

Mit der Verleihung des Gütezeichens wird die Konformität mit den Vorgaben
der RAL-GZ 728 sowie der CENELEC-Norm EN 50625-2-3
und CLC/TS 50625-3-4 bestätigt.

Blieskastel, den 14.10.2025
Diese Urkunde ist gültig für ein Jahr.

↑ **Certified climate protection through RAL-compliant recycling of refrigeration appliances**

6.1.4. Advice and support

The resource centres were visited at least once a quarter. Contact with the municipalities took place through visits and telephone calls.

Depending on their level of knowledge, resource centre staff were offered basic, refresher and advanced training courses. In 2025, resource centre staff also completed training to become **SDK** specialists. A total of 59 people have now been trained as **SDK** specialists. In addition to the basic training for resource centre staff, the course provides further expertise on the safe handling of problematic products.

Meetings with resource centre managers took place twice, in June and November 2025, at the **SDK** logistics centre in Colmar-Berg. These served the purposes of quality and safety management.

The **SDK** website provides resource centre managers and staff with a platform containing primarily safety-related information (operating and work instructions, procedures in the event of incidents, etc.). This is continuously revised and updated.

There is also a specific set of criteria for resource centres to ensure compliance with quality standards for the **SDK** collection point. Currently, 11 resource centres are certified with the quality label.

↓ **Information corner in one of the resource centres**

6.2. The SDK fir Betriber (for Businesses)

6.2.1. Product Management

The role of the **SDK fir Betriber** in the field of waste product management is to safely dispose of small quantities and special products under fair conditions, complementing the collectors operating in the market. In 2025, over 120 different product groups were collected and sent for proper recycling or disposal.

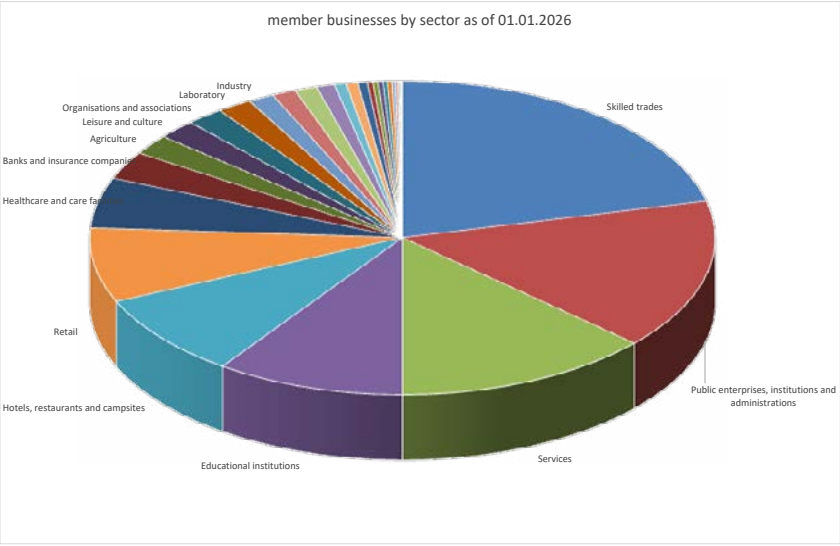
6.2.2. Advice and Support

As at 31 December 2025, 5,970 facilities and businesses were registered. There were 320 new registrations. After business closures and adjustments, this represented an increase of 130 businesses compared to the previous year's figure of 5,840. Businesses and facilities continued to receive intensive support in 2025. The following were carried out:

- 2,305 analyses and concepts drawn up
- 2,546 label audits carried out
- 320 new businesses connected
- 2,280 other advisory visits carried out.

A total of 7,451 visits were made to facilities. These included 299 initial consultations and 32 training sessions. Since the start of the initiative, a total of 149,128 advisory visits have been carried out.

The number of employees at affiliated organisations stood at 313,178 as of 31 December 2025. In terms of numbers, the skilled trades lead the way with 1,269 businesses, followed by public enterprises, institutions and administrations with 924 businesses, and the service sector with 792 businesses. In terms of staff numbers, the skilled trades sector also leads the way with 64,589 employees.

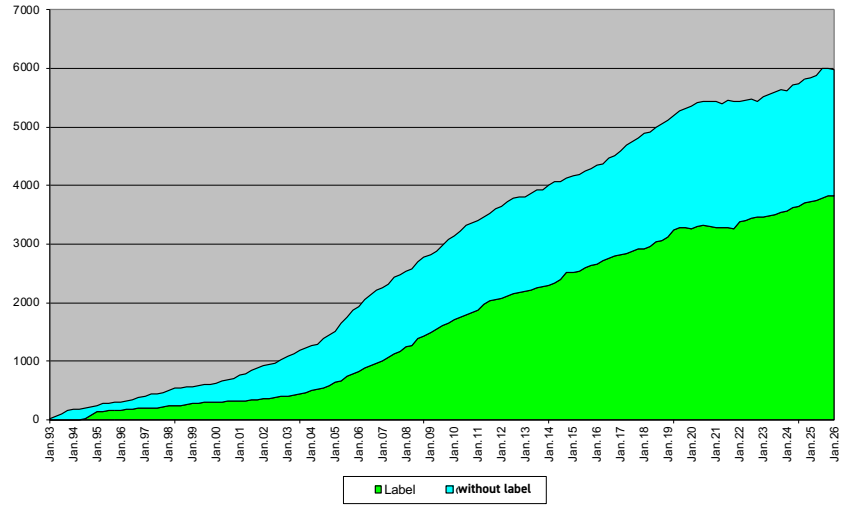


↑ **Distribution of affiliated businesses (number of businesses) by sector as at 31 December 2025**

↑ **Consultation appointment**

↓ **Consultation appointment**

The number of contacts via email or telephone remains at the same level as the previous year. Of 28,647 customer communications, 17,504 enquiries related to topics covered by the **SDK fir Betriber**.



← **SDK fir Betriber - Development of affiliated and labelized companies 1993 - 2025**

6.2.3. The SuperDrecksKëscht® label

The **SDK** label is a quality mark for environmentally sound waste management. It is certified in accordance with the international standard for environmental labels, ISO 14024, and recognises organisations in the private and public sectors that, by implementing the **SDK fir Betriber** concept, make an active contribution to protecting the environment through modern waste and resource management.

Organisations within the scope of the certification regulations include, for example, companies and public authorities, construction sites, communal housing complexes (residences), shared offices or waste disposal companies. For consumers, it is a reliable mark of recognition for businesses that operate sustainably.

To keep pace with societal developments in the areas of sustainability and the circular economy, the label was updated in 2021. It now stands for the sustainable use of resources. This assesses the performance of certified businesses more effectively than the slogan 'for ecological waste management'.

The number of labelled facilities stood at 3,843 on 31 December 2025, an increase of 3.4% compared with the previous year. The goal of further increasing the number of labelled facilities was thus achieved. The label's standing remains high in 2025 – attributable to the advertising campaign and accompanying measures (certificates, diplomas). The proportion of affiliated facilities is slightly higher than in the previous year, at 64.2%.

↓ **Presentation of the label plaque**

6.2.4. Specialised expertise

→ CONSTRUCTION SECTOR

Through the **SDK fir Betriber** scheme, the **SDK** supports all stakeholders active in the construction sector. Public and private developers have the opportunity to manage the waste management of their construction projects in accordance with the **SDK fir Betriber** concept. Construction companies and tradespeople working on building sites are advised in line with the concept. 20 construction sites were affiliated in 2025.

53 specific training courses for the construction sector were held in 2025 by the **SDK** in collaboration with the IFSB construction industry training institute, with 884 people taking part.

Ongoing discussions with the aforementioned and other stakeholders have also addressed prevention and demolition. With this in mind, there are plans to further develop the topic of using building materials that facilitate subsequent demolition.

To enable extensive separate collection even on smaller construction sites, the so-called LECO-Box (Lëtzebuerger ECO-Box) was developed in 2016. Other stakeholders in Luxembourg now offer a comparable collection container. The **SDK** has thus fulfilled its role by providing impetus and will not be constructing any further LECO-Boxes.

↓ Specialist advice on construction projects

→ ECOLOGICAL WASTE MANAGEMENT IN RESIDENTIAL PROPERTIES

Findings to date from residual waste analyses, as well as the results of the **SDK**'s analyses for businesses, showed that very little recyclable material was being collected, particularly in residential buildings where several households live and household waste is disposed of collectively.

The Luxembourg Waste Act of 21 March 2012, as amended on 9 June 2022, has set ambitious targets. A key objective is to increase the waste recovery rate. Section 13(5) explicitly requires that waste must be sorted in residential buildings with four or more units.

The SuperDrecksKëscht® initiative therefore launched the 'Ecological Waste Management in Residential Buildings' project as early as 2012. Using the tools that have proven effective at **SDK** for businesses, the aim is to improve waste separation in communal residential complexes.

The first residential complexes were connected in 2013. As of 31 December 2025, a total of 89 property management companies representing 6,157 residential complexes, corresponding to 30,978 flats, were recorded in the **SDK** database. Of these, 862 residential complexes had been equipped with 994 collection points. The number of residential complexes awarded the label stood at 37.

Local authorities have a significant influence on waste management in residential properties through municipal regulations and permits, and are also keen to introduce facilities for separate waste collection as part of their legal obligations. There is close cooperation in this area with an increasing number of local authorities and waste management consortia.

Since 2021, a training programme has been available for the promotion and implementation of the **SDK** residential concept, as well as training modules on the safe handling of hazardous and problematic products that may arise during collection in residential properties. Increasingly, representatives of property management companies are being trained so that they can pass on their knowledge (train-the-trainer concept). The training programme was continued in 2025.

Resource chutes for 1,100-litre residual waste bins have been available on the market since 2016, and for 240-litre residual waste bins since 2017. Resource gates make it possible to record the residual waste of individual households on an individual basis by volume and thus to charge only for the amount of residual waste generated, in accordance with the polluter-pays principle.

Since 2018, the **SDK** has been developing a resource gate to complement the range of resource gates on offer.

Since 2025, the **SDK** has only offered services for which there are now sufficient other providers on the Luxembourg market on a fee-paying basis. The **SDK** continues to support municipalities and syndicates free of charge through the **SDK**'s advisory and support services for businesses, including the awarding of labels. General information and awareness-raising for residents also remain free of charge.

↑ collection point in a residential property

↓ Information leaflet

→ AGRICULTURE

In 2025, with the support of the MBR machinery ring, the provision of advice to agricultural businesses was pursued intensively.

As of 31 December 2025, 124 agricultural businesses were affiliated, as well as 14 wine-growing businesses, representing a further increase compared to the previous year.

The collection of agricultural plastic sheeting has been organised directly by the Ministry of Agriculture since 2022. The disposal of vineyard and fruit tree stakes treated with wood preservatives is now also coordinated by the Ministry of Agriculture. The **SDK** is on hand to provide support with its expertise,

The Foire agricole Ettelbruck is an important event, particularly for advising and informing stakeholders in the agricultural sector. The **SDK** is represented here with a joint stand alongside the Consumer Protection Association (ULC).

↓ **Information of stakeholders of the agricultural sector at the agricultural fair Ettelbruck (Foire agricole)**

7. ENVIRONMENTAL PERFORMANCE

7. ENVIRONMENTAL PERFORMANCE

7.1. Direct environmental aspects

In the following input and output balance, we have compiled the key data on direct environmental aspects over the last five years.

→ INPUT

	2021	2022	2023	2024	2025		
Material							
Paper consumption[1)]	301.500	195.500	223.000	194.000	204.500	Blatt A4	Büro/Verwaltung
Energy	2.107.671	1.902.814	2.078.071	2.016.000	2.009.792	in kwh	Total, of which
	290.012	300.308	399.758	418.631	434.664	kWh	Electricity (on-site)
	24.739	33.732	45.595	40.582	31.061	l	Cooking oil (heating)
	28.235	14.897	9.897	4.228	0	l	Biodiesel (heating)
	0	0	0	0	9.514	l	Diesel (heating)
	90.094	108.207	120.541	116.817	116.574	l	Biodiesel (transport)
	51.608	19.496	10.363	15.381	16.944	l	Diesel (transport)
	7.745	4.825	4.775	4.481	4.089	l	Diesel (work machinery)
	0	737	137	11	16	l	Biodiesel (work machinery)
	474	330	0	0	0	l	Petrol (transport)
converted into	231.557	315.732	426.769	379.848	290.731	kwh	Kitchen oil heating
kWh[2)]	238.303	125.731	83.534	35.684	0	kwh	Biodiesel heating
	760.395	913.265	1.017.367	985.934	983.885	kwh	Biodiesel transport
	505.243	190.861	101.457	150.585	165.881	kwh	Diesel transport
	0	0	0	0	93.142	kwh	Heating oil heating
	75.824	47.237	46.747	43.869	40.031	kwh	Diesel machinery
	0	6.220	1.158	95	139	kwh	Biodiesel machinery
	2.224	599	1.281	1.354	1.318	kwh	LPG machinery
	4.113	2.861	0	0	0	kwh	Petrol transport
	66.226	100.858	184.251	193.336	200.422	kwh	Electricity for transport (not included in the total, as it is already included in electricity for premises)
Share of renewable energy in total consumption	72,13%	87,31%	92,81%	90,29%	85,05%		(green electricity, kitchen oils, biodiesel)
Water[3)]	1.389	1.933	2.126	1.013	844	m3	Total, of which
	836	1.276	1.414	509	689	m3	Drinking water
	553	657	712	504	155	m3	Rainwater

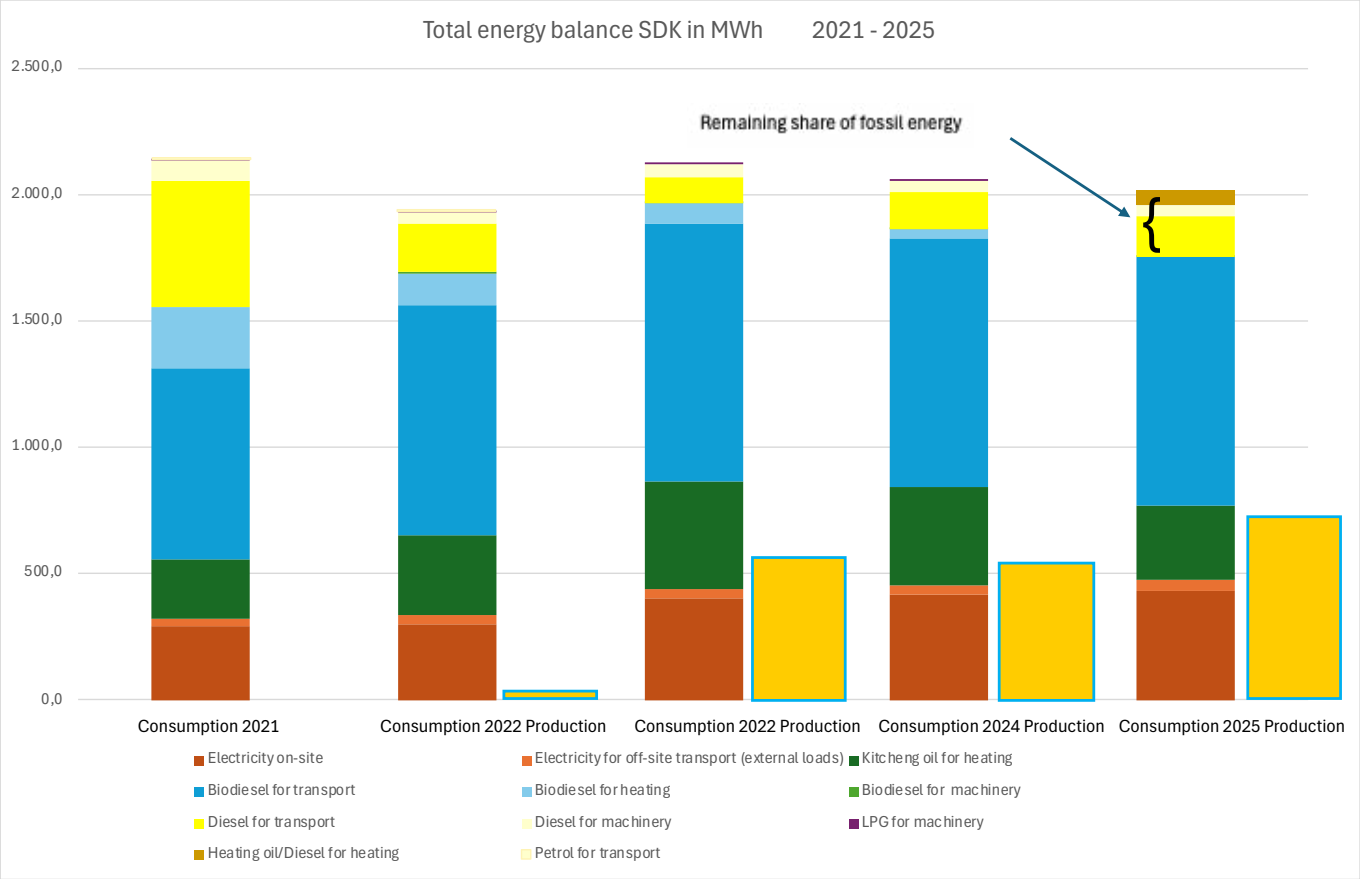
The site area remains unchanged at 17,940 m² of paved area and 3,900 m² of green space – a total of 21,840 m² of operational area.

1) Purchased volumes

2) Conversion factors and sources: see Appendix

3) Water consumption from 2 meter points; consumption from the 3rd meter point cannot be determined

→ INPUT - ENERGY BALANCE 2021-2025



NOTES ON THE ENERGY BALANCE:

Energy balance showing electricity consumption on-site and via external charging (red), kitchen oil (green), biodiesel (blue) and fossil diesel (yellow/brown) in MWh. The graph shows that the proportion of fossil fuels has been significantly reduced since 2023. Further details can be found on the following pages.

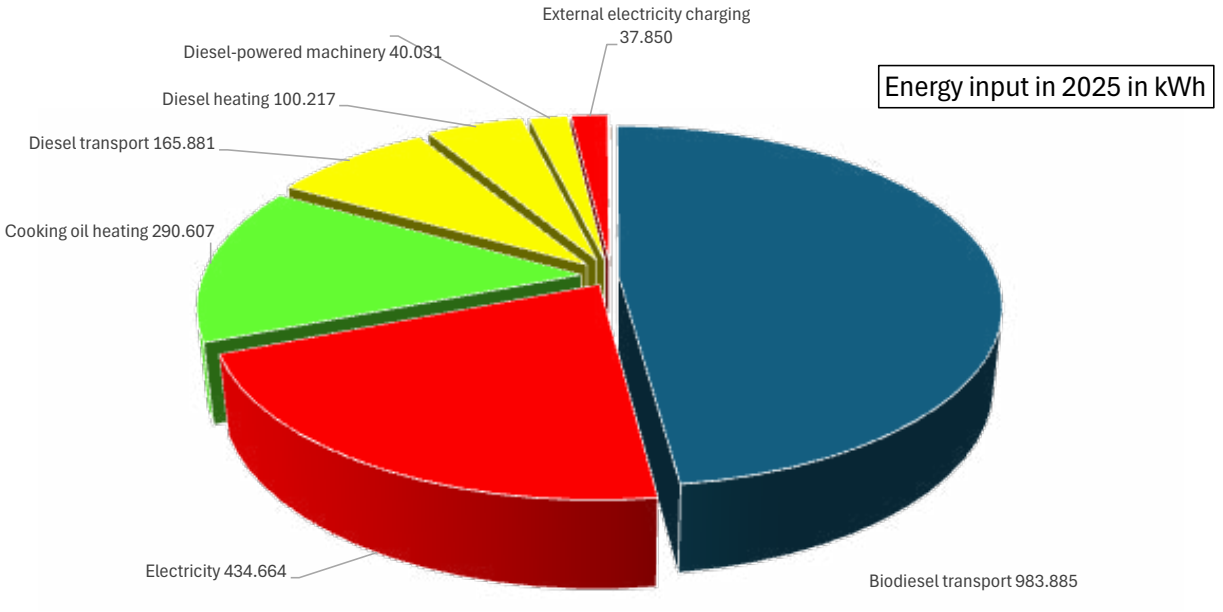
In 2025, 72.87% of the energy used by the vehicle fleet was supplied by biodiesel, which was purchased from partners who transesterify the collected cooking fats and oils into biodiesel. This means that our own activities have substituted fossil diesel, thereby significantly reducing CO_2 emissions (see CO_2 balance).

Since 2015, used cooking fat has been used directly as fuel for the site's central heating system. The direct use of cooking fats and oils is CO_2-neutral. Otherwise, biodiesel was used for heating between 2021 and 2024. This is also CO_2-neutral. In 2025, diesel had to be used on an exceptional basis (back-up heating due to the refurbishment of the heating system).

Details on individual environmental aspects are provided on the following pages. Further information on the direct environmental aspects is contained in the 2025 report by the Environmental Management Officer, which is available on request.

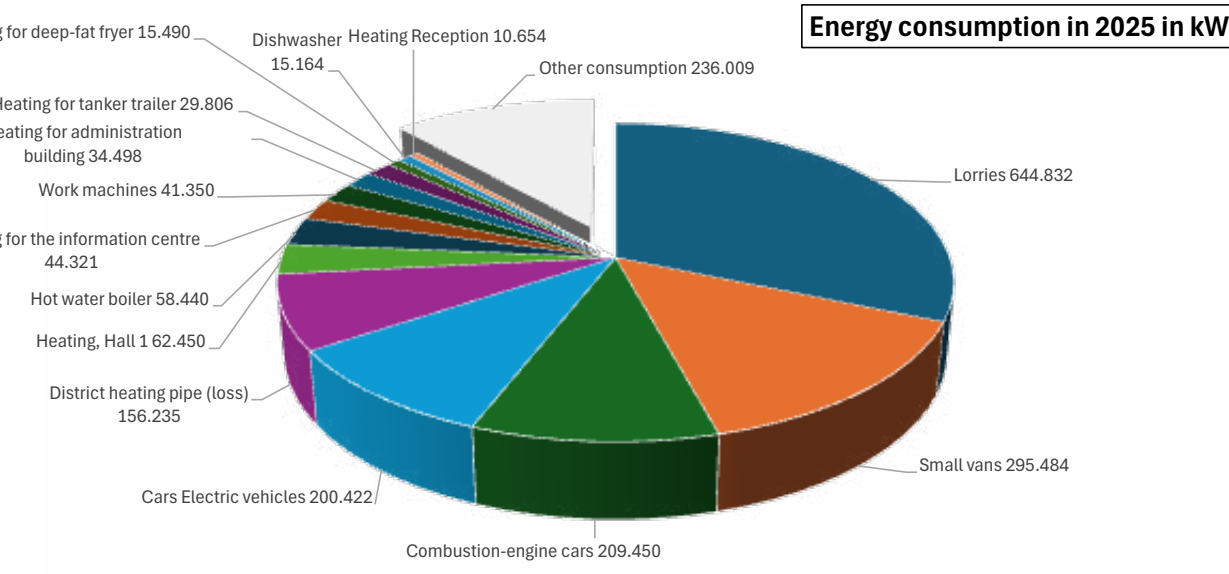
→ INPUT - ENERGY BALANCE FOR 2025 BY ENERGY SOURCE 2

To illustrate energy input and energy consumption in 2025, the 2025 section from the chart on the previous page is shown here again as a pie chart.



→ OUTPUT - ENERGY BALANCE FOR 2025 BY MAJOR ENERGY CONSUMERS

The largest energy consumers are vehicles: lorries account for 31.4%, vans for 14.4% and cars for 20% (of which 9.8% is accounted for by electric vehicles and 10.2% by combustion engines). This is followed, as shown in the graph, by the heating of buildings and facilities. Only 11.5% (electricity consumers) are not yet recorded separately.



→ OUTPUT

	2021	2022	2023	2024	2025		
Electricity generation							
	0,00	9.563	575.999	550.123	729.469	kWh	Solar panels since 30 November 2022

Emissions							in total, of which
CO_2 [1]	137.793,68	52.544,24	27.879,75	41.097,98	45.217,73	kg	traffic
NO_x	352,41	347,66	355,07	365,97	307,45	kg	traffic
Particulate matter	9,97	9,92	10,24	10,32	8,86	kg	traffic
TOC	16,95	65,93	2,39	5,65	4,15	kg	Logistics centre / Hall 1 [2]
CO_2	20.689,38	12.761,49	12.894,12	12.135,13	11.092,97	kg	Machinery [3]
CO_2	0	0	0	0	0	kg	from electricity [4]
CO_2	0	0	44,92	19,19	26.658	kg	from heating [5]
CO	-	100,5	97	72	5,75	ppm	from heating [5]
Total CO_2 (Scope 1)	158.483,06	65.305,73	40.818,79	53.252,30	82.968,70	kg	

Waste	15.268	41.212	70.688	76.837	78.747	kg	in total, of which [7]
	-	12.752	24.021	28.806	25.089	kg	Waste from remanufacturing [8]
	300	270	7.700	9.850	5.000	kg	Excavated soil/garden waste
	1.173	9.846	2.230	3.215	6.278	kg	Old stock / archives
	8.442	14.472	32.358	31.413	38.134	kg	Contents of oil and grease separators
	5.353	3.872	4.379	3.554	4.246	kg	in-house

1) For 2021 and 2022, only CO_2 emissions caused by fossil fuels are shown.

2) As emissions are very low (maximum permitted value of 400 kg TOC), the influence of ambient air is significant.

3) The figures were calculated for the first time in 2020.

4) 100% green electricity from renewable sources, hence CO2 neutrality

5) A new heating system was installed in 2025 – the use of mineral diesel was necessary for the required backup heating; from 2023, the figure for the biodiesel content is based on the value from the life cycle assessment

6) No measurement available for 2021; otherwise, value from a measurement or average; the Commodo-Incommodo permit only requires spot checks every 2 years..

7) The figures from 2022 onwards are not comparable with previous years (see details on waste).

8) Collected for the first time from 2022

Emissions: The calculation method was changed in 2021 and the data has been recalculated. The data from the 2019 and 2020 environmental statements is therefore not comparable with the following figures.

For conversion factors and sources, see the appendix

→ ENERGY: ELECTRICITY

Total electricity consumption rose by 3.8% to 434,631 kWh in 2025. This is due to the further increase in the proportion of charging electricity for electric vehicles resulting from the provision of company cars for commuting.

Since 2020, the proportion of electricity consumption attributable to electric vehicles has been calculated by separately accounting for the various charging methods (charging at the logistics centre, public charging points and private charging as reported by users). Charging at the logistics centre takes place via 8 charging points, each with 2 charging sockets, as well as via high-voltage sockets on the logistics centre premises, particularly in Hall 2. The estimated share of electric vehicle charging at the logistics centre in 2025 was 163,369 kWh, corresponding to 37.59%.

If the consumption from electric vehicle charging is excluded, the **SDK** Centre's electricity consumption rose by 3.9% from 261,146 kWh to 271,295 kWh, which falls within the expected range of fluctuation. In relation to the number of employees, consumption rose to 3,873.43 kWh per employee, which also falls within the range of fluctuation.

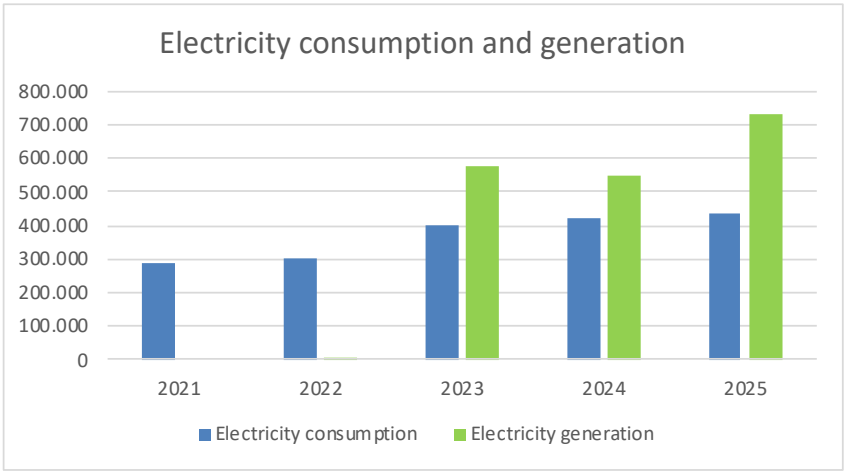
GREEN ELECTRICITY

For several years now, the **SuperDrecksKëscht® campaign** has been sourcing green electricity (enovos Naturstrom until 2023, Electris Ökostrom Cat. 1 from 2024).

ELECTRICITY GENERATION

The planned energy generation at the site was already realised in a first phase at the end of 2022. The PV system on Hall 1, with a capacity of 719.14 kWpeak, was connected to the grid on 30 November 2022. As planned, the PV system was expanded by 457.94 kWpeak in 2025 to cover Hall 1 and Hall 2. Due to the expansion, the existing transformer had to be replaced with a 1000 kVA transformer. The expanded section of the system went into operation on 22 September 2025. In the medium term, there are plans to install a battery storage system to increase the proportion of self-consumption and become even more independent of the external power supply.

In 2025, the PV system produced 729.4 MWh of electricity, of which 223.2 MWh was consumed on-site and 506.2 MWh was fed into the grid.



↑ The solar panel system installed on Hall 1 in 2022 (top) and the solar panel system installed on Hall 2 in 2024 and commissioned in 2025 (bottom)

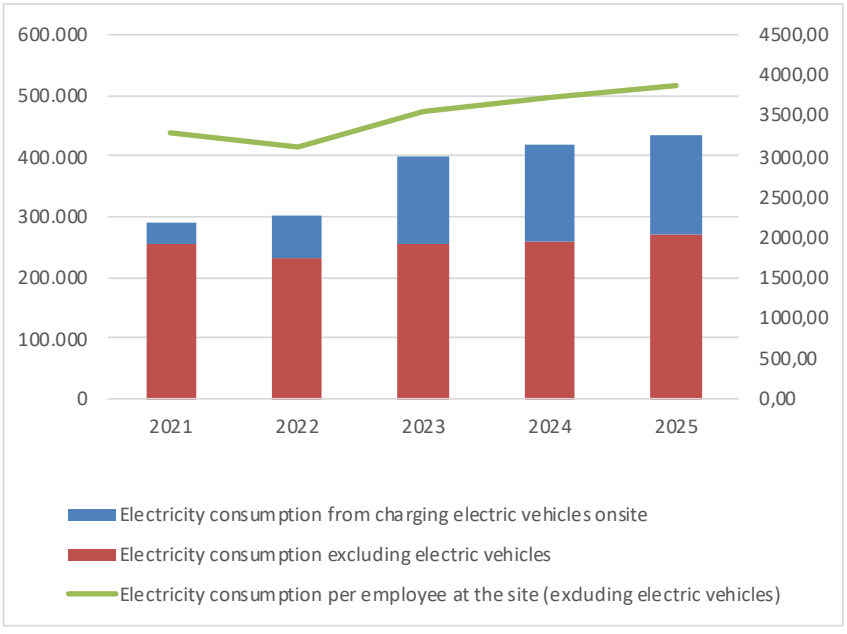
IMPACT

By using electricity from renewable energy sources, the environmental impact has been kept to a minimum. The consumption of fossil fuels is avoided. The use of green electricity is carbon-neutral. Thanks to the PV system, the site generates a significant proportion of its own electricity consumption.

	2021	2022	2023	2024	2025	
Number of employees, adjusted	77,24	74,36	71,96	70,14	70,04	
	2021	2022	2023	2024	2025	
Electricity consumption	290.012	300.308	399.758	418.631	434.664	in kWh
Electricity generation	0	9.563	575.999	550.123	729.469	in kWh
Net balance	-290.012	-290.745	176.241	131.492	294.805	in kWh
Electricity consumption from charging electric vehiclesat the site	35.018	68.272	144.171	157.485	163.369	
as percentage	12,07%	22,73%	36,06%	37,62%	37,59%	
Electricity consumption excluding electric vehicles	254.994	232.037	255.587	261.146	271.295	
	2021	2022	2023	2024	2025	
Electricity consumption per employee at the site (excluding electric vehicles)	3.301,32	3.120,45	3.551,79	3.723,21	3.873,43	in kWh per empl.

↑ Electricity consumption 2021–2025 Number of employees (full-time equivalents)

Determination of on-site electricity consumption from charging via a user survey – consumption stated in kWh/100 km plus details of external charging



← Electricity consumption 2021–2025
Left-hand scale in absolute kWh
Right-hand scale in kWh per employe

→ ENERGY: HEATING - HEAT

HEATING

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

Total fuel consumption at the Colmar-Berg site in 2025 was 40,575 litres, of which 31,061 litres (28,731 kg) were waste cooking oils and 9,514 litres were mineral diesel. Consumption has thus fallen significantly again by 9.45% compared to the previous year. However, the higher calorific value of the mineral diesel must be taken into account here. Its use was necessary as a mobile replacement heating system was required whilst the heating system was being modernised.

In 2025, measures were implemented to optimise the heating and hot water management systems, based on the findings of the 2022 energy audit. In particular, two new burners were installed, which are now much better suited to the use of cooking oils. The aim is to use 100% used cooking fats for heating with the new heating system.

The absolute quantity of used kitchen oils used, as well as their share of total fuel consumption, should therefore be regarded as an exception. Only the year 2026 will show whether the target of using 100% used kitchen oil for heating will be achieved. In general, the use of used kitchen oil does not require any additional transport and is therefore particularly climate-friendly, not only compared to fossil fuels but also compared to the biodiesel used up to 2024.

Expressed as CO2 equivalent, the consumption of used cooking oils in 2025 corresponds to a saving of 77.3 tonnes of CO2 compared to 100% heating oil/diesel (see also carbon footprint).

Energy consumption for heating per employee (full-time equivalents) amounted to 579.31 l per employee in 2025.

Emissions and odours resulting from the use of used cooking oils did not pose any problems.

IMPACT

By using biodiesel and used cooking oil since 2015, the environmental impact has been kept to a minimum. With the exception of justified individual cases, fossil fuels are generally not used. The use of biodiesel and used cooking fats is carbon-neutral. Transport distances are minimised, particularly through the use of used cooking fats collected via the **SDK**.

↑ **Washing station for used cooking oil containers**

↓ **The processing of used cooking oil for the heating system**

Bei zusätzlichem Wärmebedarf im Winter wird ein zweiter Brenner genutzt, der mit Biodiesel betrieben wird. Durch die direkte Nutzung von eingesammelten Speiseölen sowie Biodiesel in der Zentralheizung können pro Jahr etwa 130 to CO_2-Äquivalente vermieden werden. Dies entspricht den CO_2-Emissionen von 840.000 km eines durchschnittlichen PKWs.

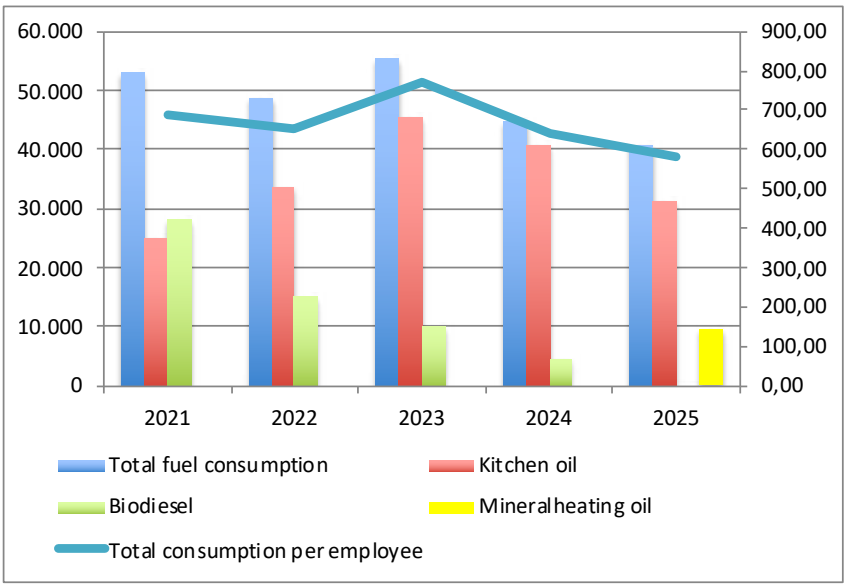
	2021	2022	2023	2024	2025
Number of employees, adjusted	77,24	74,36	71,96	70,14	70,04

	2021	2022	2023	2024	2025	
Total fuel consumption	52.974	48.611	55.492	44.810	40.575	in l
Cooking oil	24.739	33.732	45.595	40.582	31.061	in l
Biodiesel	28.235	14.879	9.897	4.228	0	in l
Mineral heating oil	0	0	0	0	9.514	in l

	2021	2022	2023	2024	2025	
Total consumption per employee	685,84	653,72	771,16	638,87	579,31	in l per empl.
Cooking oil consumption per employee	320,29	453,63	633,62	578,59	443,48	in l per empl.
Biodiesel consumption per employee	365,55	200,09	137,54	60,28	0,00	in l per empl.
Diesel consumption (min.) per employee	0,00	0,00	0,00	0,00	135,84	in l per empl.

↑ Fuel consumption for heating 2021–2025 Number of employees (full-time equivalents)

Diesel consumption in 2025: due to rented mobile backup heating during the refurbishment of the heating plant



← Fuel consumption for heating 2021–2025
Left scale in litres (absolute)
Right scale in litres per employee

→ ENERGY: MOBILITY AND LOGISTICS

VEHICLES

The aim of equipping the entire car fleet with fuel-efficient vehicles is gradually being put into practice. By the end of 2025, there were 56 electric vehicles in the fleet. Since autumn 2022, all employees with more than two years' service have been offered an electric vehicle (small car). This is part of the **SDK** climate protection strategy. Where the use of electric vehicles is not yet possible due to insufficient range (lorries, vans), vehicles equipped with the latest exhaust emission control technology (Euro 6d-temp) are used.

The mileage in 2025 was 1,844,258 km, representing a slight increase (3.85%) compared to the previous year's figure of 1,775,844 km. In 2023, mileage rose by 39.9% compared to 2022.

This was due to the sharp increase in passenger cars in 2022 (up 54.5%) resulting from the aforementioned provision of company cars for commuting. Through the use of self-generated renewable electricity (PV system) to charge the cars and the reduction in fossil fuel consumption by employees (journeys to and from work largely covered by cars with combustion engines until 2022) has had a clearly positive impact on the carbon footprint.

In general, improved scheduling and the use of public transport also contributed to making mobility more sustainable. The statistics on "alternative mobility" show that, in the consulting and project management sector, 1,623 km were covered by carpooling, 3,510 km by public transport and 148 km by bicycle or on foot for appointments (estimated figures from the consulting team). This results in additional CO2-equivalent savings compared to the use of a car.

FUELS / ENERGY

Since 2017, consumption has been converted into kWh. Due to the high number of company cars, consumption stood at 1,350,188 kWh (similar to the previous year). Of this, 644,832 kWh (47.76%) was attributable to lorries, 295,484 kWh (21.88%) to information vehicles and door-to-door collection vehicles, and 409,872 kWh (30.36%) to cars.

The share of fossil fuels stood at 11.14% in 2025. 72.87% was covered by biodiesel. The electricity share of electric vehicles (predominantly green electricity) amounted to 200,422 kWh, representing 14.84% (compared with 14.54% in the previous year).

The average fuel consumption of lorries was 350 kWh/100 km (approx. 40.6 l), whilst that of the information vehicles and door-to-door collection vehicles was 199 kWh/100 km (approx. 23.36 l) . Fuel consumption for passenger cars was 27.12 kWh/100 km. These figures are on a par with the previous year. The gradual replacement of vehicles with more efficient models has been having a noticeable effect for several years. Overall, fuel consumption relative to kilometres driven was 73.21 kWh/100 km. (previous year 74.89 kWh). Fuel consumption per employee stood at 19,277 kWh.

↑ Use of biodiesel

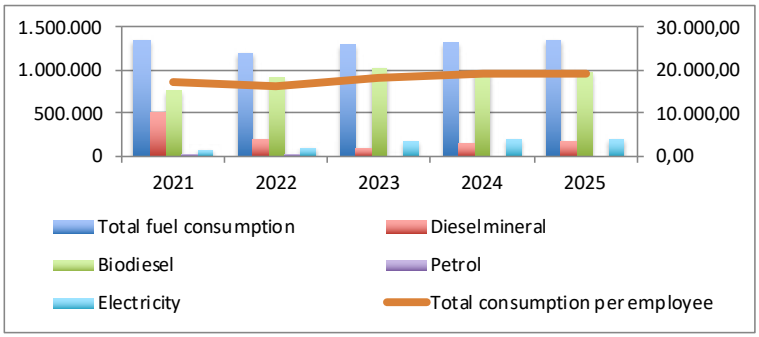
↓ Filling station

	2021	2022	2023	2024	2025
Number of employees, adjusted	77,24	74,36	71,96	70,14	70,04

	2021	2022	2023	2024	2025	
Total fuel consumption	1.335.978	1.207.846	1.303.076	1.329.855	1.350.188	in kWh
Conventional diesel1)	505.243	190.861	101.457	150.585	165.881	in kWh
Biodiesel	760.395	913.265	1.017.367	985.934	983.885	in kWh
Petrol	4.113	2.861	0	0	0	in kWh
Electricity	66.226	100.858	184.251	193.336	200.422	in kWh

	2021	2022	2023	2024	2025	
	17.296,45	16.243,22	18.108,33	18.960,01	19.277,39	in kWh per empl.
petrol station	6.541,22	2.566,72	1.409,91	2.146,92	2.368,38	in kWh per empl.
Biodiesel consumption per employee	9.844,58	12.281,67	14.137,95	14.056,66	14.047,48	in kWh per empl.
Petrol consumption per employee	53,25	38,48	0,00	0,00	0,00	in kWh per empl.
Electricity consumption per employee	857,41	1.356,35	2.560,47	2.756,43	2.861,53	in kWh per empl.

↑ Energy consumption: Mobility/Logistics 2021–2025 Number of employees (full-time equivalents)



← Energy consumption: Mobility/Logistic 2021–2025
Left-hand scale/bars in absolute kWh
Right-hand scale/line in kWh
per employee

→ EMISSIONS

WORKPLACE AIR

The last measurement – which must be carried out by an accredited body – took place on 5 June 2024. Luxcontrol certified that the AGW values for respirable dust and alveolar dust, as well as for VOCs and mercury, were significantly (< 10%) below the corresponding AGW values. No measurement was carried out in 2025.

EXHAUST AIR

The periodic emission measurements (dust, heavy metals and VOCs) required by the operating licence must be carried out every 3 years by an accredited body and were last carried out on 10 November 2022. As no date was available at the end of 2025, the next measurements will not take place until early 2026. The values measured on 10 November 2022 were all well below the respective specific limit values.

The continuous monitoring of VOCs (volatile organic compounds) carried out by the operator resulted in an extrapolated total annual amount of 4.146 kg of emitted VOCs for the reporting period, which corresponds to 1.03% of the permitted maximum emissions of 400 kg VOC. Compared to 2022 (65.93 kg), this represents a significant reduction, as in previous years, due to the replacement of the activated carbon filter at the end of 2022.

HEATING SYSTEM

The heating system's exhaust gases are regularly inspected by a certified specialist firm (heating engineer).

TRANSPORT

The figures used for the CO_2 calculation for lorries are based on the DLSV guidelines. In general, the value of 2.67 kg CO_2equ/l of diesel fuel was also used for vans and cars up to 2022. From 2023 onwards, these figures are based on the DIN EN ISO 14083:2023 standard (3.17 CO_2equ/kg = 2.67 kg CO_2equ/l). The data for nitrogen oxides and particulate matter are the maximum values from the Euro standard.

IMPACT

Neither the measurements carried out as part of the operating licence in the context of occupational health and safety, nor the emission measurements in the exhaust air, give cause for intervention. The toxic substances emitted after exhaust air filtration (heavy metals, etc.) are well below the limit values. Emissions from the heating system show only low CO emissions; the use of renewable energies results in no CO_2 emissions.

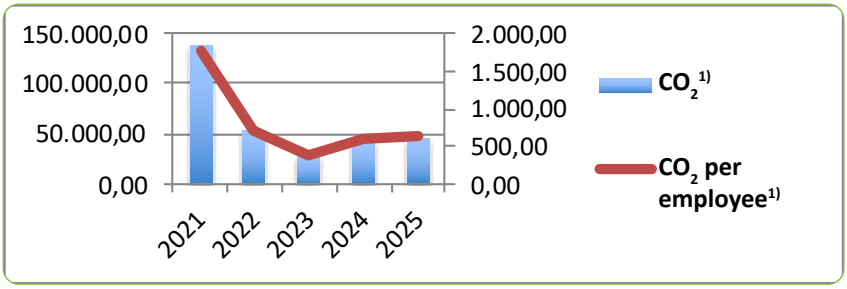
Details regarding CO_2 and CO_2-equivalent emissions can be found in the following extract from the Climate Protection Report. Scope 1 and 2 data for 2025. As the Scope 3 calculations for 2025 are not yet available, this environmental statement includes the Scope 3 figures from 2024.

The full 2025 carbon footprint report will be published on the SDK website from June 2026: → https://sdk.lu/en/sdk-climate-protection-in-practice/.

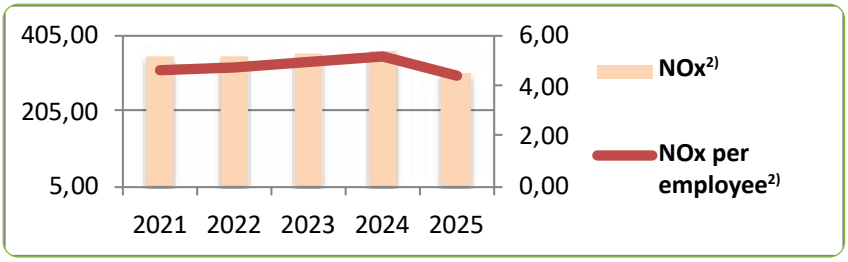
↑ Sorting and decanting station with a filtration system and continuous emissions monitoring

↓ Wash area with oil and grease separator

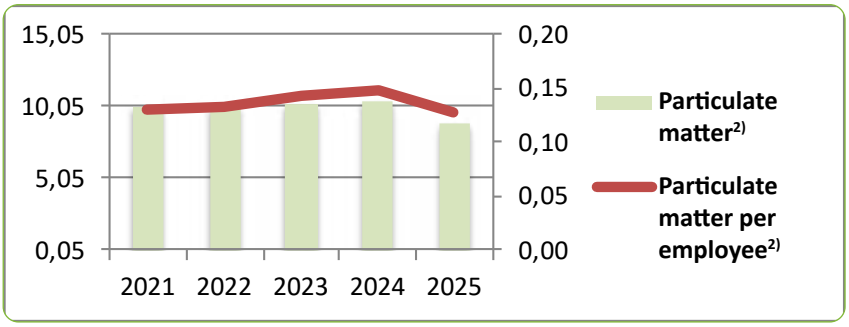
	2021	2022	2023	2024	2025	
Number of employees, adjusted	77,24	74,36	71,96	70,14	70,04	
	2021	2022	2023	2024	2025	
CO_2 [1]	137.793,68	52.544,24	27.879,75	41.097,99	45.217,73	in kg
NOx [2]	352,41	347,66	355,07	365,07	307,45	in kg
Particulate matter [2]	9,97	9,92	10,24	10,32	8,86	in kg
	2021	2022	2023	2024	2025	
CO_2 per employee [1]	1.783,97	706,62	387,43	585,94	645,60	in kWh per empl.
NOx per employee [2]	4,56	4,68	4,93	5,20	4,39	in kWh per empl.
Particulate matter per employee [2]	0,13	0,13	0,14	0,15	0,13	in kWh per empl.



CO2 emissions from transport 2021–2025
Left-hand scale/bars in absolute kWh
Right-hand scale/line in kWh per employee



NOx emissions from transport 2021–2025
Left-hand scale/bars in absolute kWh
Right-hand scale/line in kWh per employee



Particulate matter emissions from transport 2021–2025
Left-hand scale/bars in absolute kWh
Right-hand scale/line in kWh per employee

1) 2021: Only CO_2 emissions caused by fossil fuels. Transport performance involving the use of biodiesel and electricity as fuel is not included. From 2022: Based on the life-cycle assessment of biodiesel produced from Used kitchen oils, a value of 0.004539 kgCO_2e/l is included for biodiesel. Electricity is still not included. Values for 2021–2023 have been slightly adjusted compared to previous reports.
2) Only emissions caused by fuels are shown here. Transport performance where electricity was used from 2017 onwards is not included.

The calculation method was revised in 2021 and the data from 2017 onwards has been recalculated. Data from environmental statements for previous years is therefore not comparable. For conversion factors and sources, see the appendix.

CARBON FOOTPRINT ACCORDING TO THE GHG PROTOCOL

In 2020, **SDK** produced its first carbon footprint based on the international GHG (Greenhouse Gas Protocol) standard, identifying and, where possible, quantifying both direct and indirect greenhouse gas emissions. A Climate Council has been in place since 2021.

The assessment primarily covers emissions caused by the operator of the **SuperDrecksKëscht® campaign** at the site, as well as emissions from upstream and downstream processes. Further details can be found in the comprehensive climate protection report which is continuously updated and also includes the targets and planned mitigation activities.

The 2024 report showed a calculated total carbon footprint of 1,255.33 tonnes of CO_2 equivalents and a calculated saving of 2,835.13 tonnes of CO_2 equivalents. In the climate protection report, the footprint and savings are shown separately in detail and explained, as required by the standards.

SCOPE 1 – DIRECT EMISSIONS (2025)

Direct emissions in 2025 amounted to:

- Transport: 45.2 tonnes of CO_2 equivalents from vehicles (lorries, vans, cars). In 2019, this figure was still 194.4 tonnes of CO_2 equivalents (a decrease of just under 76.7%). The reason for this is the significantly increased use of biodiesel and electric vehicles.
- Heating/heat: The use of mineral diesel in the mobile temporary heating system during the installation of the new heating system resulted in emissions of 26.7 tonnes of CO_2 equivalents. The direct use of collected waste cooking fats and biodiesel in the central heating system prevented a total of 77.3 tonnes of CO_2 equivalents that would have been generated by the use of fossil heating oil/diesel.
- Machinery: This concerns high-pressure cleaners, compactors and a sweeper. The existing gas-powered forklift was replaced by an electric forklift back in 2021. Through various measures (replacing fossil diesel with biodiesel, a new second-hand gas-powered sweeper that uses gas from collected gas cylinders, etc.), emissions were reduced to 11.1 tonnes (previous year: 12.1 tonnes) of CO_2 equivalents.

If the emissions avoided through the use of waste cooking fats in the heating system were credited, the consumption by the vehicle fleet and machinery would already be largely offset.

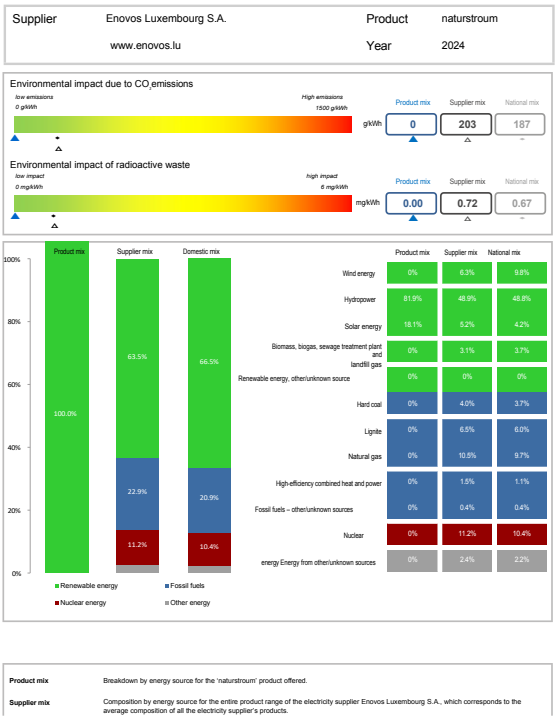
SCOPE 2 – INDIRECT EMISSIONS (2025)

Direct emissions amounted to:

- Site electricity consumption: This was sourced as green electricity from Enovos. The green electricity label for this product in 2024, in accordance with the Grand-Ducal Regulation of 21 June 2010, indicates 0 kg of CO_2 equivalents.
- Electricity production: In 2025, 294,805 MWh more electricity was produced than consumed. The CO_2 savings from using green electricity and producing green energy total 175.9 tonnes of CO_2 equivalents compared to the national electricity mix.
- Electric vehicles: These are charged on-site via the national Chargy system, as well as through private charging. Generally, the use of electric vehicles also results in a figure of 0 kg CO_2 equivalents, as they are powered to a very large extent by green electricity.

↑ The link to the latest climate change report: → https://sdk.lu/en/sdk-climate-protection-in-practice/

↓ Energy labelling for enovos Naturstrom 2024 (2025 not yet available)



SCOPE 3 – INDIRECT EMISSIONS (2024)

Data on Scope 3 emissions was recorded in full for the first time in 2023 for the 2022 reporting year. The 2024 carbon footprint is set out below. The full, detailed climate protection report is available on the **SDK** website.

SCOPE 3A – INDIRECT EMISSIONS FROM UPSTREAM ACTIVITIES

- 3.1 Purchased goods and services (logistics containers, office supplies/consumables, etc.). Purchasing is carried out in accordance with the guidelines for suppliers and products described on page 14 (point B.6). In 2024, a total of 346.27 tonnes of CO_2 equivalents was calculated here.
- 3.2 Capital goods
  Purchasing is carried out in accordance with the guidelines for suppliers and products described on page 14 (point B.6).
  PV system: The upstream chain, production and installation of the PV system expanded in 2024 account for 369.60 tonnes of CO_2 equivalents.
  Electric vehicles: The upstream, production and downstream stages of the four vehicles purchased in 2024 account for 97.7 tonnes of CO_2 equivalents.
  Other major purchases in 2024 included 1 lorry trailer, additional reusable containers, furniture and fittings, as well as electrical and IT equipment.
  A total of 557.20 tonnes of CO_2 equivalents was calculated for this in 2024.
- 3.3 Fossil fuels used in the upstream chain
  In 2024, a total of 80.80 tonnes of CO_2 equivalents was calculated here.
- 3.4 Upstream transport and distribution
  This concerns waste management in Luxembourg by cooperation partners and the transport of waste products from the logistics centre to the product recipient. In 2024, a total of 153.78 tonnes of CO_2 equivalents was calculated here.

SCOPE 3B – INDIRECT EMISSIONS BY LOCATION

- 3.5A Own waste: The management of self-generated waste is carried out in accordance with the **SDK fir Betriber**concept and is prevention-oriented. With a few exceptions, this is handled via the logistics centre (included in 3.5B).
- 3.5B Collected and treated waste handled via the **SDK** logistics centre: Under the 'Resource Potential' concept, sustainable and resource-oriented treatment and recycling processes are prioritised here. Overall, the management of internal and external waste in 2024 resulted in savings of 2,582.91 tonnes of CO_2 equivalents through recycling processes, the production of secondary raw materials and energy recovery1).
- 3.6 Business travel: Business trips abroad not undertaken using company vehicles are rare. In total, business travel (flights, rail travel, private cars) resulted in emissions of just 1.2 tonnes of CO_2 equivalents in 2024.
- 3.7 Commuting: In autumn 2022, electric vehicles were made available to all employees who had been with the company for two years or more and did not yet have a company car; these are predominantly charged on-site using electricity generated in-house. This leaves a figure of just 26.16 tonnes of CO_2 equivalents 'remaining' in 2024.

SCOPE 3C – INDIRECT EMISSIONS FROM DOWNSTREAM ACTIVITIES

Only category 9 is relevant here.

- 3.9 Downstream transport and distribution
  This includes the travel of training and meeting participants, as well as employees employed via Ligue HMC. In 2024, a figure of 36.86 tonnes of CO_2 equivalents was calculated here.

Generally, in line with the slogan 'climate protection in action', climate protection is at the heart of all **SDK** activities.

1) Details in the Climate Report; calculation basis: ZWS Carbon Metric Factors 2020 (Zero Waste Scotland)

→ WATER / WASTEWATER

SERVICE WATER

Due to technical issues with the water meters on the part of the municipality of Colmar-Berg, only partial data on drinking water consumption for 2024 is available for 2025. Despite intensive efforts by the management and the environmental management officer, there is no consumption data for one of the three metering points (Hall 1 – reprocessing). It is possible that in previous years, water volumes were metered and billed that were not consumed by **SDK**.

Drinking water consumption at the two accessible meter points in 2025 differs only slightly from the previous year and confirms the significant decline in consumption compared to 2022 and 2023. The significant decline in 2024 and 2025 is likely due mainly to two measures. Firstly, the introduction of canopies/roofs for the containers holding flammable products (oil and diesel filters and oil-contaminated products), which renders the water-based cooling practised in previous years unnecessary, and secondly, the rare use of drinking water for watering green spaces. It is also suspected that significant quantities of water were lost through leaks in 2022 and 2023.

At the third metering point, where there is still no known water meter for total consumption, a top-up of drinking water into the rainwater cistern was recorded in 2025.

Rainwater consumption in the administration building remained at the same level as in previous years.

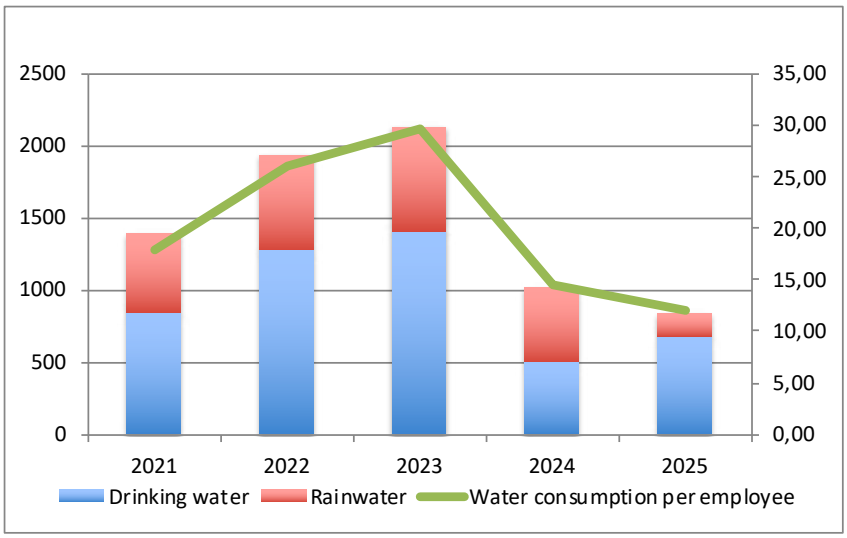
↑ Rainwater supply
Rainwater savings are recorded via a separate water meter.

↓ Water consumption 2021–2025

Number of employees (full-time equivalents)

	2021	2022	2023	2024	2025	
Number of employees, adjusted	77,24	74,36	71,96	70,14	70,04	
	2021	2022	2023	2024	2025	
Total water consumption	1389	1933	2126	1013	844	in m³
Drinking water	836	1276	1414	509	689	in m³
Rainwater	553	657	712	504	155	in m³
	2021	2022	2023	2024	2025	
Water consumption per employee	17,98	26,00	29,54	14,44	12,05	in m³ per empl.
Drinking water consumption per employee	10,82	17,16	19,65	7,26	9,84	in m³ per empl.
Rainwater consumption per employee	7,16	8,84	9,89	7,19	2,21	in m³ per empl.

Rainwater consumption from the cistern at Hall 1, which is mainly used for cleaning containers, fell significantly in 2025. One reason for this was the spring of 2025, which saw very little rainfall compared to previous years. Technical problems arose in the summer and autumn: the inlet to the cistern was partially blocked and could only be cleared in late autumn. The inlet has since been redesigned to make it less prone to blockages, and more frequent checks are now carried out.



← Water consumption 2021–2025
Left scale/bars in m3 (absolute)
Right scale/line in m3
per employee

DRINKING WATER

The drinking water consumed is drawn from the water mains using the Inowatio system.

WASTEWATER

All wastewater from the recycling processes (in particular the cleaning of buckets used for collecting cooking oils and fats), as well as from the storage areas for containers holding oil-contaminated products and the washing area for the external cleaning of containers, is routed through coalescence or grease separators and monitored before being discharged into the public sewerage system. No volume measurement is carried out. The volume of wastewater largely corresponds to water consumption. There is no direct discharge of rainwater or surface water into the receiving watercourse. Routine maintenance was carried out in accordance with the general standard DIN EN 858-2.

The coalescence separator and the sludge trap at the washing area were emptied and cleaned on 11 March 2025, 22 May 2025, 11 June 2025, 1 September 2025 and 8 December 2025. It was not necessary to empty and clean the coalescence separator and the sludge traps at the container storage area or petrol station due to the low volume of inflow during the reporting period.

IMPACT

Environmental impact is kept to a minimum through the use of rainwater on the one hand and the use of coalescence and grease separators on the other.

↓ Drinking water for personal consumption

→ BIODIVERSITY AND LAND USE

GREEN SPACES

Native plant species are used for planting the green spaces. Native standard-tree fruit trees have been planted on the green space between Hall 1 and the Colmar-Berg residential development. In 2019, replacement planting was carried out for diseased trees. In addition, an insect-friendly flower meadow was sown in 2019 as part of the national 'pesticide-free' campaign.

The green spaces around the administration building, planted in 2006, were recultivated and partially replanted as part of the building's extension. In 2019, two pine trees were felled for road safety reasons and replaced with native trees.

To improve biodiversity, nesting aids and an insect hotel were installed. Compost heaps also contribute to biodiversity. In 2020, another large insect hotel was erected in the area adjacent to the residential quarter near the flower meadow.

In early 2025, an area of spruce and non-native cherry laurel was replaced with native trees and shrubs.

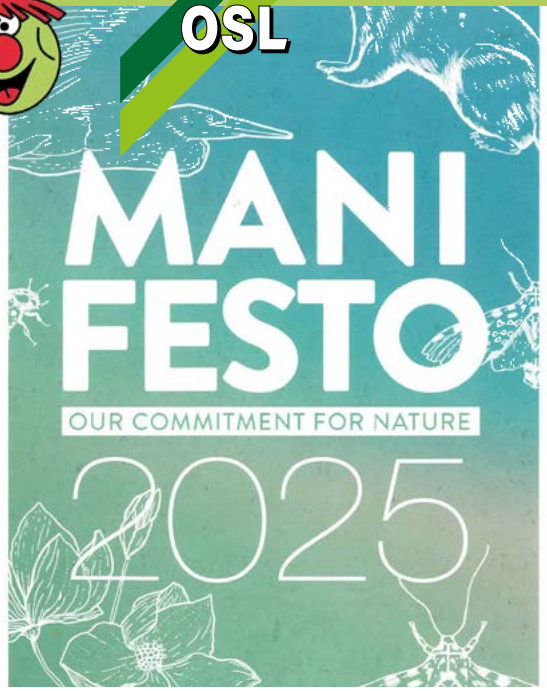
As part of its participation in the Nature Pact for Businesses 2025, **SDK** committed to further measures:

- → Removing the remaining non-native cherry laurel bushes (approx. 5 m²) by the end of 2026 and replacing them with native plants (blackthorn and sea buckthorn bushes).
- → Planting two new pear trees and two new cherry trees in the existing orchard

With regard to the fruit trees, it should be noted that the fruit can be consumed by both staff and the local community.

In addition to managing its own green spaces, particular attention is paid within the procurement policy to ensuring that nature conservation and biodiversity are taken into account as far as possible when assessing suppliers.

The SDK's biodiversity strategy takes into account the 2023 guidance document 'EMAS and Biodiversity', published by the Lake Constance Foundation and the Global Nature Fund with the support of the European Commission's Directorate-General for the Environment.



↑ Nature Pact for Businesses Pledge

↓ Ffruit trees on the premises

LAND USE

In 2014, the administration building was extended. To this end, a sealed container storage area was built over, and no further land was sealed. The construction was carried out in accordance with the specifications using environmentally friendly building materials, and the building was optimally equipped in terms of energy efficiency and energy technology (e.g. through the use of LED lighting).

The area of land in use during the reporting period has remained unchanged since 2014 at 21,840 m2, of which 17,940 m2 is paved and 3,900 m2 is green space.

↑ The area in front of the administration building

PESTICIDES

The **SuperDrecksKëscht® campaign** is a member of the 'Pesticide-Free' platform . With a few justified exceptions, the use of pesticides on outdoor areas and against animal pests is avoided.

IMPACTS

Apart from land sealing, there are no negative impacts on the soil. The measures mentioned (flower meadow, nesting aids, insect hotel, standard fruit trees) make a positive contribution to local biodiversity.

↓ Large insect hotel and flower meadow

→ WASTE PRODUCTS

As part of its reporting obligations to the Environmental Agency, **SDK** maintains a particularly precise and detailed record of the waste generated. This is analysed by the environmental management officer and categorised for a clearer overview.

New inventory software was introduced in 2021. From 2022 onwards, a distinction will be made for the first time between internal waste and waste from recycling operations. Unlike internal waste, waste from recycling operations is non-cyclical and depends on the type and quantity of external waste collected and processed.

Furthermore, separator contents/sludge, old stock and green waste are listed separately, as these account for a large proportion of the total waste volume.

In 2025, a total of 78.747 tonnes of waste was generated (compared to 76.837 tonnes in the previous year). Waste from recycling accounted for 25.089 tonnes, or 31.9%. If the contents of oil and grease separators (38.1334 tonnes) are included, the figure rises to 80.3%.

As is the case every year, a not inconsiderable amount – 6,278 tonnes – is attributable to the disposal of waste materials. In 2025, this also included the disposal of waste products associated with the renovation of the Infocentre/training area.

In-house waste is managed using the **SDK fir Betriber** concept, in line with the hierarchy of prevention before reuse and recycling before disposal.

In-house waste amounted to 4,246 kg in 2025. This represents a significant increase compared to the previous year, but the figure is on a par with 2023. Generally speaking, the residual waste volume of 50–60 kg per year per employee is so low that fluctuations in the double-digit percentage range are not unusual. British studies, for instance, estimate figures of around 500 kg per year per employee in office buildings.

In 2024, a brown bin was purchased for the separate disposal of organic/food waste, which had previously been composted. Organic waste has therefore only been included in the statistics since 2024.

IMPACT

The total volume of recyclable and problematic waste from the office and logistics centre is low, as the '**Aktion SuperDrecksKëscht®** fir Betriber' scheme implements not only extensive waste separation but also waste prevention measures. The company's internal waste management system has been awarded the ISO 14024-certified '**SDK fir Betriber**' label.

As part of its assessment of resource potential, the **SDK** examines the recycling processes at the product recipient. The assessment and certification are carried out in accordance with the ISO 14024 standard. The aim is to maximise the proportion of material recycling (reuse of raw materials – circular economy). This naturally also applies to internal waste products.

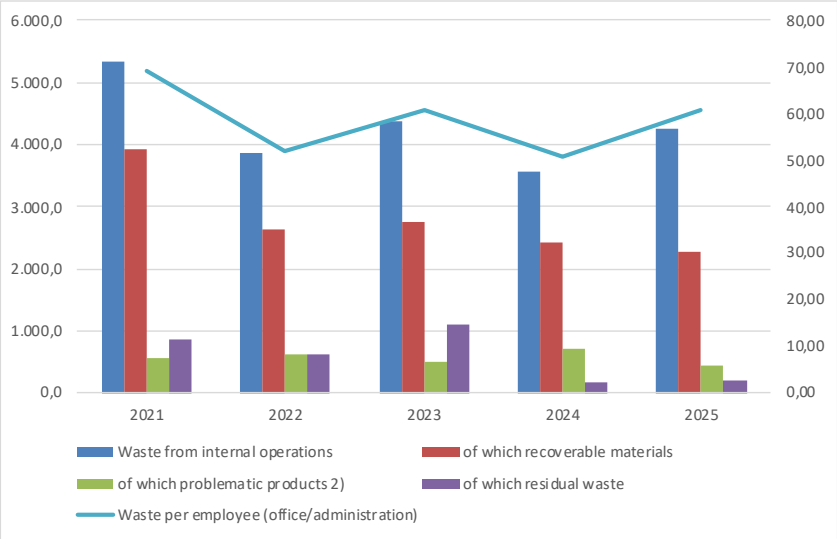
↓ **Waste generation 2021–2025**
Number of employees (full-time equivalents)

	2021	2022	2023	2024	2025
Number of employees, adjusted	77,24	74,36	71,96	70,14	70,04

	2021	2022	2023	2024	2025	
Total waste	15.268,3	41.211,6	70.687,8	76.837,4	78.746,8	in kg
Waste from remanufacturing	nicht erhoben	12.751,8	24.020,9	28.805,9	25.088,8	in kg
Contents of oil and grease separators / sludge	8.442,0	14.472,0	32.358,0	31.412,5	38.133,5	in kg
Old stock / archives / special settlements	1.173,0	9.845,9	2.229,9	3.215,0	6.278,4	in kg
Excavated soil / construction waste / garden waste	300,0	270,0	7.700,0	9.850,0	5.000,0	in kg

	2021	2022	2023	2024	2025	
Waste from internal operations	5.353,3	3.871,9	4.379,0	3.554,0	4.246,1	in kg
of which recoverable materials	3.932,9	2.645,0	2.769,6	2.424,9	2.280,9	in kg
of which problematic materials	551,4	619,4	505,9	705,1	450,7	in kg
of which organic waste	nicht erhoben	nicht erhoben	nicht erhoben	264,0	1.318,0	in kg
of which residual waste	869,0	607,5	1.103,5	160,0	196,5	in kg

	2021	2022	2023	2024	2025	
Waste per employee (office/administration)	69,31	52,07	60,85	50,67	60,62	in kg per empl.

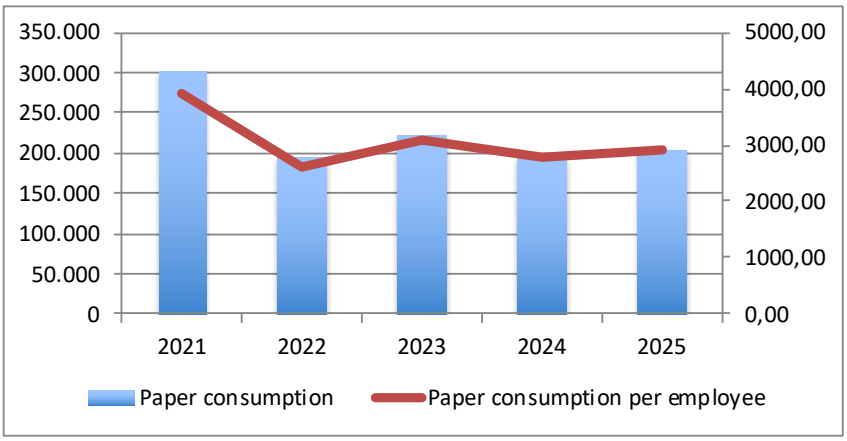


← **Waste generation 2021–2025**
Left scale/bars in absolute kg
Right scale/line in kg per employee

Only internal waste that can be directly influenced is shown here.

→ PAPER CONSUMPTION

Paper consumption can be estimated based on purchase volumes, although it is not possible to precisely determine annual quantities. Consequently, volumes fluctuate despite increasing digitalisation.



← Paper consumption 2021–2025
Left-hand scale/bars in A4 sheets (absolute)
Right-hand scale/line in A4 sheets per employee

Number of employees in full-time equivalents; A3 has been converted to A4

→ HAZARDOUS SUBSTANCES

A significant proportion of the waste products handled by the **SuperDrecksKëscht® campaign** are hazardous substances and are predominantly subject to dangerous goods legislation (ADR regulations). Accordingly, the vehicles used for 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 legal requirements. This includes precautionary measures relating to occupational health and safety and fire protection. It also encompasses appropriate training for staff.

→ NOISE

No noise emissions exceeding the legally prescribed limits originate from the **SuperDrecksKëscht® campaign** site.

→ TRAFFIC VOLUME

The volume of traffic to and from the logistics centre by the company's own and external vehicles (suppliers, delivery drivers) is low and does not cause any exceptional disruption to the neighbourhood.

→ IMPACTS

The storage of problematic products does not have any negative impact on the surrounding area. Noise and traffic volume do not cause any exceptional disruption to the neighbourhood.

↓ Pressurised gas cylinders at the logistics centre

CONTINGENCY PLANNING FOR OPERATIONAL DISRUPTIONS

As part of the activities of the **SuperDrecksKëscht® campaign** described in Chapter 2, particularly with regard to the conditioning and treatment of problematic waste products, a safety management system is in place which places particular emphasis on preventive fire safety and emergency measures. An emergency folder exists containing all essential information on the alarm procedure and other information relevant to emergencies.

The hazard detection system is the central hub where all information from leaks and sensors, as well as from the fire alarm system and the operational status of key safety equipment, is consolidated. The alerts received by the hazard detection system are, on the one hand, transmitted via SMS to the smartphones of the emergency response team, the warehouse coordinator, the site security team and the safety officer. On the other hand, the messages are displayed on PCs at the plant security reception, in the administration office, in the warehouse coordinator's office and in the technical room of Hall 1. In addition, the messages can also be viewed via an app available to plant security and the emergency response team.

Furthermore, regular maintenance and servicing measures are carried out, with their scheduled implementation monitored using a checklist. The following are particularly worth mentioning:

- BMZ: The annual maintenance and the periodic inspection of the fire alarm control panels were carried out on 27 October 2025. Maintenance of the hazard detection system took place on 31 July 2025.
- RWA: The annual maintenance of the smoke and heat exhaust vents had to be postponed by the service provider to early 2026 due to scheduling issues. No unscheduled interventions due to faults were necessary.
- EX sensors: Inspections, maintenance and calibrations were carried out in accordance with the maintenance contract on 28 January 2025, 15 April 2025 and 7 October 2025.
- Fire-fighting water system: Inspections and maintenance were carried out in accordance with the maintenance contract on 16 April 2025 and 13 October 2025. There were no malfunctions or unscheduled interventions during the reporting period. The annual functional test of the wall hydrants was carried out on 29 April 2025, as was the scheduled hose test. Details can be found in the test reports.
- WIBOjekt system: Inspections were carried out as part of the safety inspections. No maintenance work was required during the reporting period.
- Fire extinguishers: The annual maintenance of the fire extinguishers was carried out on 25 March 2025 and 26 March 2025.
- Firewater barriers: Inspections were carried out as part of the safety inspections. Annual maintenance took place on 4 September 2025
- First-aid kits: A check of the first-aid kits was carried out on 5 December 2025. Defective items were replaced, and missing items were replenished.
- VOC system: Annual maintenance of the VOC system's sensors was carried out on 15 April 2025 and 7 October 2025. Maintenance of the entire system took place on 4 and 5 July 2025.
- The annual maintenance of the VOC system's sensors was carried out on 15 April 2025 and 7 October 2025. Maintenance of the entire system took place on 4 and 5 July 2025.

The safety officer's report lists all maintenance and servicing measures carried out in 2025.

EVACUATION AND FIRE SAFETY DRILLS

Evacuation drills were carried out on a site-specific basis as part of the operating instructions. Training sessions on the practical use of portable fire extinguishers were held.

A drill involving external emergency services (CGDIS) last took place on 16 December 2023.

Since the Colmar-Berg Logistics Centre came into operation in 1990, there have been no incidents or accidents with significant environmental impacts.

ENVIRONMENTAL PERFORMANCE INDICATORS – SUMMARY OF KEY INDICATORS

Environmental performance can be presented using core indicators and is therefore comparable from year to year. In accordance with the requirements of the EMAS III Regulation, the core indicators are defined as follows. As set out in the environmental policy, the objective of the environmental management system is to reduce the environmental impacts of direct environmental aspects.

Figure A – Indication of the total annual impacts of direct environmental aspects

Figure B – The adjusted number of employees (full-time equivalents – converted to 100%) was used as the reference figure for environmental performance.

Figure R – Indication of the ratio of A/B as a benchmark for year-on-year comparisons.

Key indicators		2021	2022	2023	2024	2025		
Number of employees (full-time equivalents)	B	77,24	74,36	71,96	70,14	70,04		
Paper comsumption	A	301.500	195.500	223.000	194.000	204.500	pages	
Paper consumption per employee	R	3.903,42	2.629,10	3.098,94	2.765,90	2.919,76	pages per empl.	
Water	A	1.389	1.933	2.126	1.013	844	in m^3	
Water consumption per employee	R	17,98	26,00	29,54	14,44	12,05	in m^3 per empl.	
Drinking water consumption per employee	R	10,82	17,16	19,65	7,26	9,84	in m^3 per empl.	
Rainwater consumption per employee	R	7,16	8,84	9,89	7,19	2,21	in m^3 per empl.	
Energy efficiency								
Electricity	A	290.012	300.308	399.758	418.631	434.664	in kWh	significant increase from 2023 onwards due to electric vehicles
Electricity consumption per employee	R	3.754,69	4.038,57	5.555,28	5.968,51	6.205,94	n kWh per empl.	
Heating								
Total consumption per employee	R	685,84	653,73	771,15	638,87	579,31	in l per empl.	
Cooking oil consumption per employee	R	320,29	453,63	633,62	578,59	443,48	in l per empl.	In 2025, mineral diesel was used as a temporary replacement fuel.
Biodiesel consumption per employee	R	365,55	200,09	137,53	60,28	0,00	in l per empl.	
Heating oil consumption per employee	R	0,00	0,00	0,00	0,00	135,84	in l per empl.	
Mobility								
Fuel (transport)	A	1.326.077	1.207.845	1.303.075	1.329.855	1.350.188	in kWh	
Total consumption per employee	R	17.168	16.243	18.108	18.960	19.277	in kWh per empl	
Diesel consumption per employee	R	6.541	2.567	1.410	2.147	2.368	in kWh per empl	The proportion of fuel from renewable sources (bio-diesel and electricity) stood at 88.86% in 2025.
Biodiesel consumption per employee	R	9.845	12.282	14.138	14.057	14.047	in kWh per empl	
Petrol consumption per employee	R	53	38	0	0	0	in kWh per empl	
Electricity consumption for mobility	R	857	1.356	2.560	2.756	2.862	in kWh per empl	Included in total electricity consumption.
Electricity production								Production began on 30 November 2022. Further modules were added in 2025.
per employee	R	0,00	128,60	8.004,43	7.843,21	10.415,03	in kWh per empl.	
Emissions from transport								
CO2 per employee	R	1.783,97	706,62	387,43	585,94	645,60	in kg per empl.	
NOx per employee	R	4,56	4,68	4,93	5,20	4,39	in kg per empl.	
Particulate matter per employee	R	0,13	0,13	0,14	0,15	0,13	in kg per empl.	
Total waste	A	15.268	41.212	70.688	76.837	78.747	in kg	The figures for 2021 and 2022–2025 are not comparable. The total figure from 2022 onwards includes waste from remanufacturing, which was only partially accounted for in previous years.
of which oils/greases/separator contents	A	8.442	14.472	32.358	31.413	38.134	in kg	
of which problematic waste from offices/administration	A	551	619	506	705	451	in kg	
of which other internal waste	A	4.802	3.253	4.379	3.554	4.246	in kg	
Total internal waste per employee	R	69,31	52,07	60,85	50,67	60,62	in kg per empl.	
Land usage	A	21.840	21.840	21.840	21.840	21.840	m2	
Land usage per employee	R	282,76	293,71	303,50	311,38	311,82	m2 per empl.	

7.2. Indirect environmental aspects

The indirect environmental impacts of **SuperDrecksKëscht® campaign** activities are presented and assessed using criteria catalogues and checklists. Similar products and services are grouped together for this purpose.

The analysis takes into account the potential environmental impacts of the product, its ingredients and its packaging. For services, we examine as far as possible how direct and indirect environmental impacts are taken into account. This concerns:

- Environmental impacts arising from cooperation with suppliers and service providers in administration and consultancy
- Environmental impacts arising from the acceptance/collection of products
- Environmental impacts arising from the transport of products
- Environmental impacts arising from the storage of products
- Environmental impacts arising from the further processing/recycling of products

For cooperation partners and product recipients, the criteria for cooperation are set out in contracts. Cooperation 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 applied to product recipients. This primarily evaluates the output streams from recycling with a view to achieving the highest possible proportion of generated secondary raw materials. The Resource Potential Assessment generates key performance indicators that enable the 'resource performance' of product recipients to be evaluated, thereby allowing the option with the best performance to be selected when faced with alternative choices.

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

As part of the **Shop Green** campaign, important indirect environmental aspects are analysed and assessed by the administration and advisory services. This naturally concerns, first and foremost, the product groups affected by this.

Through the activities of the Qualification Department, relevant indirect environmental impacts are reduced among partners. Unfortunately, it is not possible to quantify the positive effects.

Raising awareness among citizens and businesses regarding eco-friendly and waste-reducing consumption is the core mission of the **SuperDrecksKëscht® campaign**. Reducing indirect environmental impacts is therefore a key objective.

→ PACKAGING / OPERATING MATERIALS

In line with the **SDK**'s environmental policy, the focus is not only on the analysis, presentation and assessment of packaging materials, but also on prevention. All packaging is used in the reusable system as far as possible. This also applies to cardboard boxes and plastic containers. Example: The plastic buckets frequently used by the **SDK fir Bierger** for the collection of used cooking fats and oils are rinsed in our own cleaning facility and returned to the collection points for distribution to citizens/households (more than five cycles) .

Similarly, plastic drums that become contaminated during use and are emptied as part of the decanting/packaging process are cleaned by an external service provider and reused in the **SuperDrecksKëscht® campaign** scheme.

→ SUPPLIERS AND SERVICE PROVIDERS

A basic requirement for cooperation with suppliers is that they hold the **SDK** label or are at least affiliated with the **SDK fir Betriber**. This ensures that all partners implement at least the criteria of environmentally sound waste management.

Should products or services not be available from the suppliers mentioned above, preference is given to those with environmental/ sustainability certifications. Naturally, suppliers should be based locally.

→ PRODUCT RECIPIENTS

As described above, product recipients are assessed against criteria that include indirect environmental impacts. A basic requirement is the possession of all legally required permits.

The principle of local proximity is also an important factor for product recipients. The same applies to the possession of environmental/ sustainability certifications such as EMAS, ISO 14001, ISO 9001, ISO 50001 or certified waste management operators.

→ CARRIERS

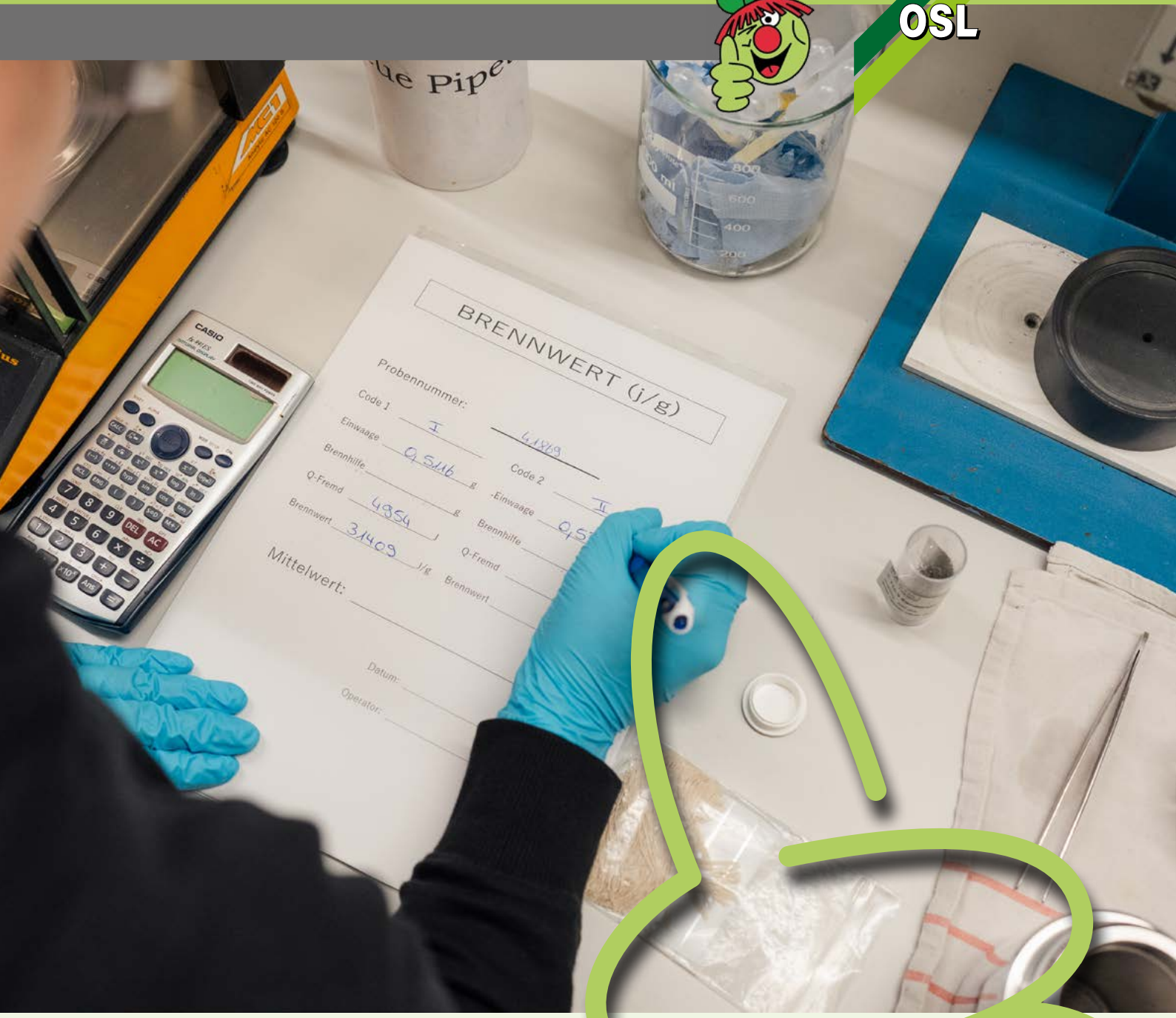
As described above, carriers and cooperation partners involved in waste disposal are also assessed against criteria that include indirect environmental impacts. A basic requirement is the possession of all legally required permits. The same applies to environmental and sustainability certifications.

→ INFORMATION FOR EMPLOYEES AND CUSTOMERS

Articles on sustainability topics are regularly shared via the internal email distribution list. We also regularly inform all employees about environmental issues through training sessions. In 2024, mandatory training on environmental management, corporate social responsibility and climate protection took place for all employees.

As already mentioned, informing and raising awareness among customers – i.e. private households, businesses and institutions – is a core task of the **SuperDrecksKëscht® campaign**. This is achieved through a whole range of tools such as print media, radio, the internet, training sessions, exhibition stands and activities for children. An important partner in this regard is the Consumer Protection Association (ULC).

The information and awareness-raising efforts are not limited to waste prevention alone, but regularly go beyond this to cover other aspects of environmentally friendly and sustainable consumption.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8. ANNEXES

GLOSSARY AND LIST OF ABBREVIATIONS

ADR	European Agreement concerning the International Carriage of Dangerous Goods by Road
a	annum (Latin) = year
CO	carbon monoxide
CO_2	carbon dioxide
DIN EN ISO	Environmental management systems – Requirements with guidance for use (international standard)
ECOBOX	Reusable containers for the transport and storage of 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 of organisations in a Community eco-management and audit scheme, as amended in 2017 (Regulation (EU) 2017/1505) and 2018 (Regulation (EU) 2018/2026)
ESR Label	Entreprise socialement responsable – Luxembourg label for socially responsible businesses
kWh	Kilowatt-hour
kWpeak	maximum power that a PV system can achieve under ideal conditions
l / m^2 / m^3	litres / square metres / cubic metres
LECOBOX	mini-containers for the separate collection of recyclable and hazardous waste
LED	light-emitting diode
MA	employees
MECB	Ministry of the Environment, Climate and Biodiversity
NO_x:	nitrogen oxides
PM	Particulate Matter
SDK	SuperDrecksKëscht® campaign
SO2	Sulphur dioxide
to	Tonnes
TOC	Total Organic Carbon
EMO	Environmental management officer
EMS	Environmental management system
ULC	Union Luxembourgeoise des Consommateurs
VOC	Volatile Organic Compounds

CONVERSION FACTORS AND SOURCES

Energy content and volume to weight

Sources:

Energy label for passenger cars, Swiss Federal Office of Energy, Jan 2017

Conversion values (kg to l) according to BDB – Federal Association of the German Bioethanol Industry

	Energy content per l	Energy content per kg	Density	Factors used: greenhouse gas emissions
Standard diesel	9,79 kwh/l	11,97 kWh/kg	0,83 kg/l	2,64 kg CO_2e/l
Biodiesel	8,44 kWh/l	10,32 kWh/kg	0,88 kg/l	0,004539 CO2e/l
Kitchen Oil	8,67 kWh/l		0,92 kg/l	0

Emissions to air

Emission factors for the greenhouse gas accounting of organisations – German Federal Environment Agency

Carbon Metric Factors Zero Waste Scotland 2011–2020 dated 15 December 2021

DSLV Guide to the Calculation of GHG Emissions, as of March 2013

Table K.1 – DIN EN ISO 14083:2023 Quantification and reporting of greenhouse gas emissions from transport operations

Nitrogen oxides and particulate matter: Maximum limits from the EU Euro 6 emissions standard

Life cycle assessment of used kitchen oils; proTerra Life cycle assessment of the recycling of used kitchen oils and oils – Update 2022–2023 dated 6 March 2023

Basic data on bioenergy in Germany

Further calculation bases and sources are available on request.

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