SDK RESSOURCEN INNOVATIOUN NOHALTEGKEET CIRCULAR ECONOMY

SuperDrecksKëscht®

Aktion SuperDrecksKëscht® (SDK)*

Environmental Declaration 2025

for the reporting year 2024




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

➤ Table of contents

Preliminary note on the terminology used in this environmental statement

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

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

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

Gender and diversity statement

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

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

1. 1. Context and terminology

1.1 Aktioun SuperDrecksKëscht® and the authorised operator

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

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

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

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

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

SDK RESSOURCEN INNOVATIOUN NOHALTEGKEET CIRCULAR ECONOMY SuperDrecksKëscht®

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

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

Administration de l'environnement
Grand-Duché de Luxembourg

CHAMBRE DES MÉTIERS LUXEMBOURG

CHAMBER OF COMMERCE LUXEMBOURG
POWERING BUSINESS

Legal base:

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

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

All of **SDK**'s activities have a positive impact on the climate. With the appointment of a Climate Protection Officer in 2020 and the establishment of a Climate Council in 2021[1)], the **Aktioun SuperDrecksKëscht®** has given its climate protection strategy a new framework. A climate protection report (see pages 24 and 25) is therefore also included in this environmental statement. The **SDK** sees its activities as climate protection in action and has therefore incorporated this into the brand's external presentation.

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

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

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

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

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

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

2. Profile of the company

2.1 Development

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

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

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

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

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

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

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

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

Selective collection of waste products

Consultancy

Promotion of Shop Green products in retail

2. Profile of the company

2.2 Activities and products

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

➤ The vehicle fleet

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

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

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

The service centre

➤ The logistics centre

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

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

Sorting of medicines

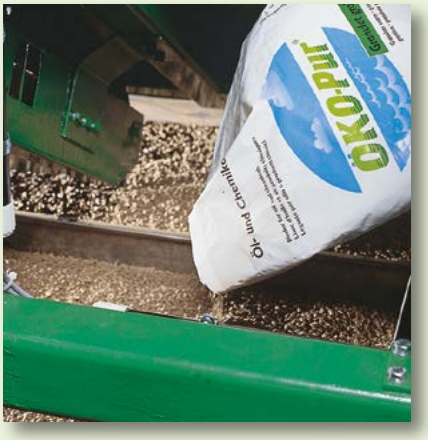
The **SDK** has a stock of collection containers of all types and qualities (cardboard, plastic, metal) for its own use, as well as for sale or transfer to customers).

➤ Products

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

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

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



Use of ÖKO-Pur

2. Profile of the company

2.3 Expertise

➤ Consultancy activities

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

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

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

Consultancy activities on waste product prevention

➤ Training (SDK-Akademie)

The **Aktioun SuperDrecksKëscht®** has further expanded its range of training programmes. In addition to education and training for people working in the field of waste management (resource centres, operational waste management), this mainly concerns educational projects with schools in cooperation with the relevant ministry.

On 13 March 2014, the **SDK** operator was officially recognised as a training institution. As of 04 September 2023, the **SDK Akademie** has been certified in accordance with ISO 21001: 2021.

Training courses

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

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

2. Profile of the company

2.4 Organisational structure and premises

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

The number of employees of the **Aktioun SuperDrecksKëscht®** at the end of 2024, including the management, was 87.

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

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

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

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

2.5 Compliance

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

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

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

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

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

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

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

SDK employees

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

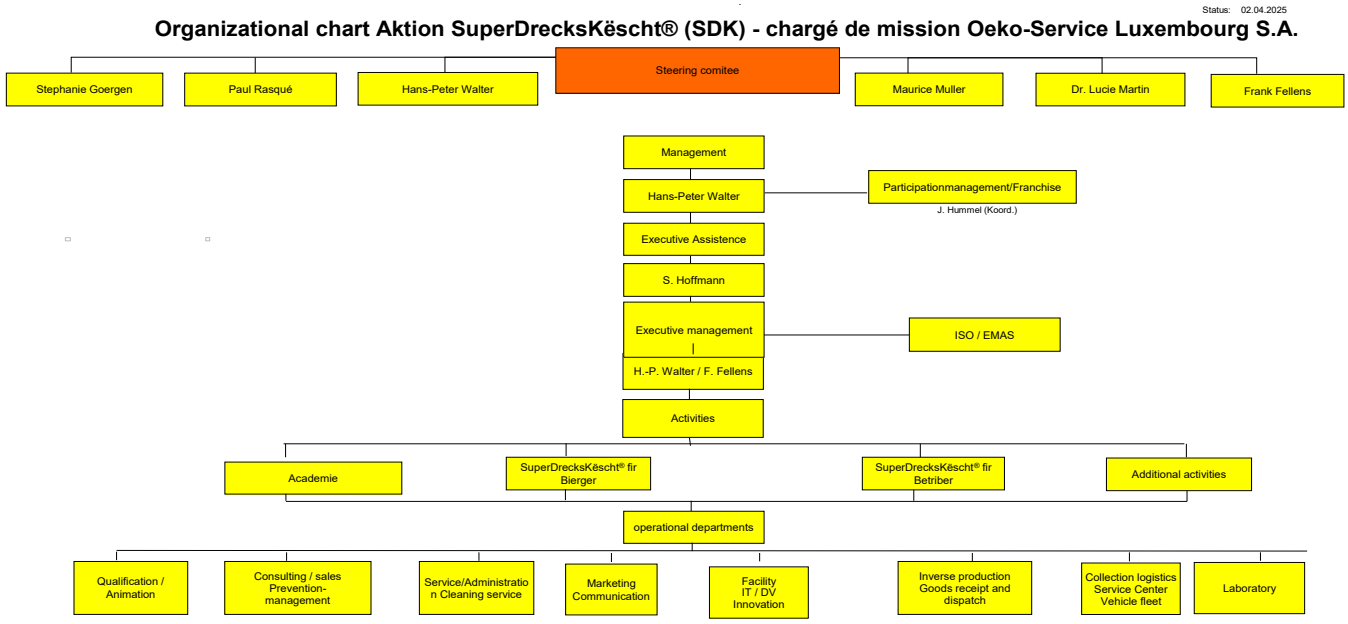
Excerpt from the legal register

(german/french)
Status/last update: February 2025

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

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

Organisation chart and premises



The 2024 organizational chart has been slightly modified compared to the organizational chart in last year's environmental statement. There have been changes in the management of the SDK.

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

3. The environmental management system of the Aktioun SuperDrecksKëscht®

3.1 The environmental management system

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

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

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

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

The EMS is designed to be a dynamic system. Every employee can and should be involved in the development of the EMS and contribute to the achievement of the environmental objectives. Therefore, an internal suggestion scheme enables all employees to submit change requests and suggestions.

Management and the EMO are available to employees for questions and suggestions. Information is also exchanged through direct communication (meetings, hallway chats, internal e-mails) and, when appropriate, incorporated into the EMS.

As part of the sustainable development and the stakeholder management programme, two new bodies were created in 2022: the Climate Protection team and the CSR team, which support the EMO on related issues. There are plans to merge these two bodies in 2025 and also to include the works council (view page 4).

As part of the implementation of the Whistleblower Protection Act of 16 May 2023, two reporting channels have been established. The reporting channels are used for the confidential reporting of complaints, objections and claims. A member of the Works Council is available to employees. The Environmental Management Officer is available to all professional stakeholders and those involved in the ISO 14024 certification. This also applies to reports concerning the protection of human rights.

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

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

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

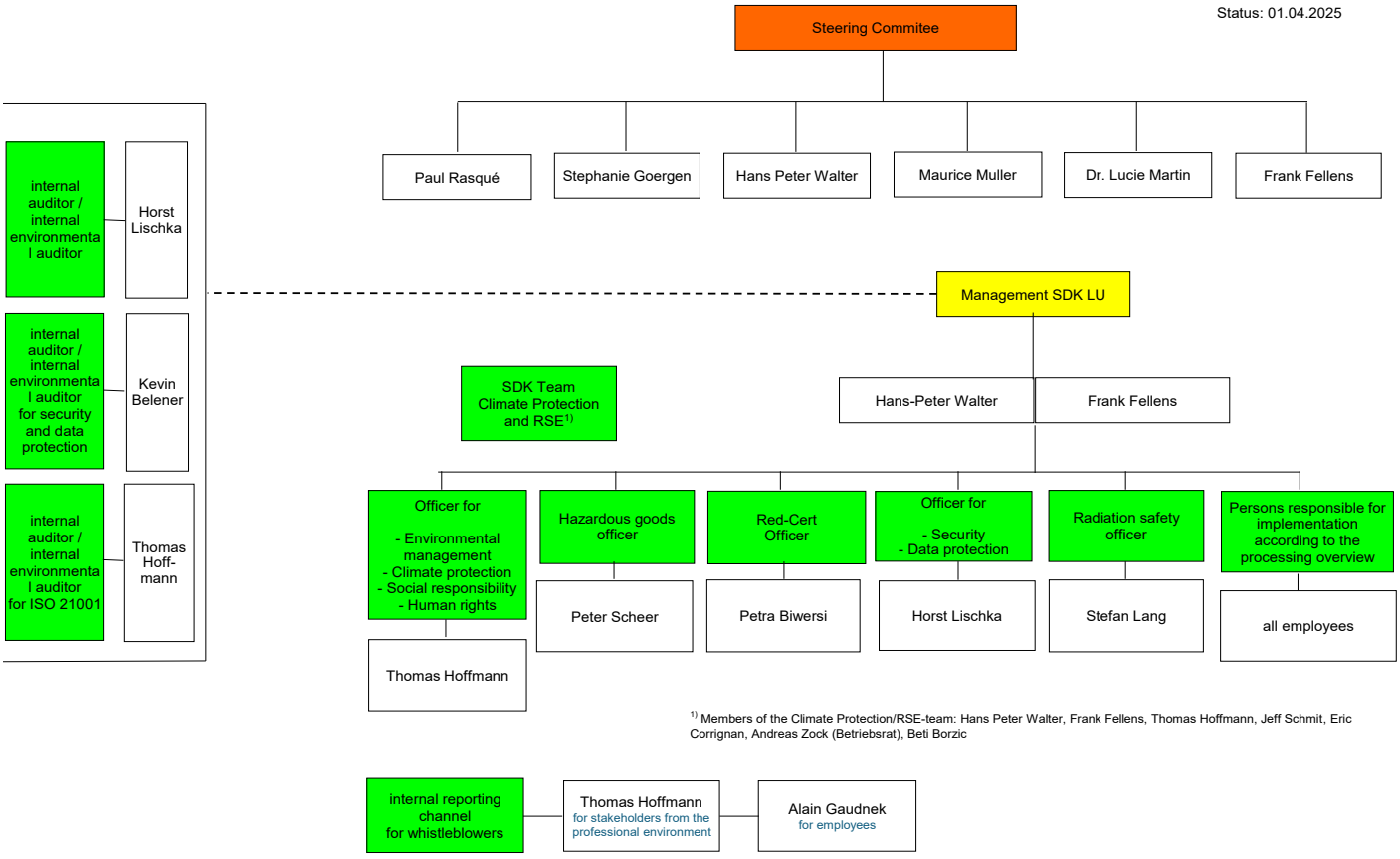
Through the publication of the environmental statement, which is regularly updated and validated by an external environmental verifier, we inform customers, business partners and **other interested parties** about the company's environmental performance. Interested parties are listed in the annual report/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

Other relevant reports are:

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

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

Organisation chart steering committee with management and environmental management officer



3. The environmental management system of the Aktioun SuperDrecksKëscht®

3.2 Code of Conduct and Environmental Code

The actions and activities of the **Aktioun SuperDrecksKëscht®** and its employees are based on principles and binding guidelines set out in the employee guidelines, the environmental code (see page 14) and the more comprehensive code of conduct planned for early 2025.

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

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

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

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

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

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

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

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

3.3 Corporate social responsibility[1)]

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

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

ESR ENTREPRISE RESPONSABLE
Stratégie RSE ▪ Gouvernance ▪ Social ▪ Environnement

RESPONSIBILITY EUROPE RE CSR LABEL

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

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

Environmental Code

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

Translation of the German original

3. The environmental management Aktion SuperDrecksKëscht®

3.4 Interested parties - stakeholders

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

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

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

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

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

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

➡ Joint meetings and workshops

➡ Review of public statements, internal programmes and stakeholder initiatives

➡ Participation/membership of stakeholder organisations

➡ Direct communication

➡ Information from the media and other public information sources

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

Interested parties ISO 14001:2015 - 4.2

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

Extract from the specific stakeholder checklist

Status/last update: March 2023
no changement 2024

4. Environmental aspects and their potential environmental impact

Direct and indirect environmental impacts

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

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

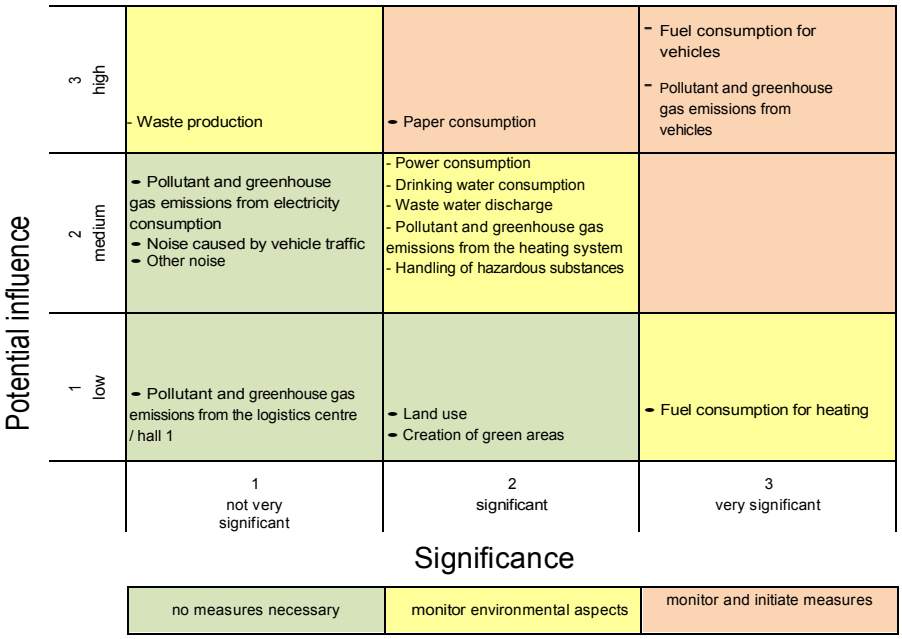
Due to the nature of **SDK**'s activities, material efficiency (other than energy and water) is not significant within the company as no goods are produced.

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

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

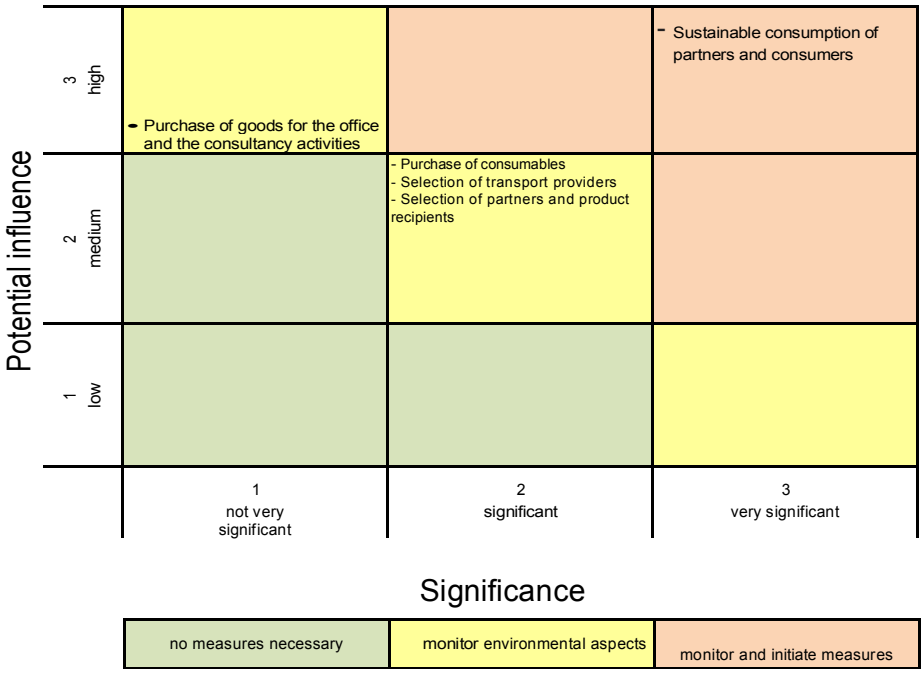
The environmental aspects identified are checked and evaluated at least once a year to determine whether they are still valid. As part of this assessment, the environmental aspects are classified according to their potential influence and their significance, on the basis of precise criteria. The assessment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

Presentation of direct and indirect environmental aspects and their assessment



Assessment of direct environmental aspects

Status/last update: February 2024



Assessment of indirect environmental aspects

Status/last update: February 2024

5. Environmental performance – environmental key performance indicators

5. 1 Direct environmental aspects

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

➤ Input

	2020	2021	2022	2023	2024		
Ressources							
Paper consumption[1)]	215.000	301.500	195.500	223.000	194.000	Blatt A4	office administration
Energy	1.922.961	2.107.671	1.902.814	2.078.071	2.016.000	in kwh	Total, thereof
	254.887	290.012	300.308	399.758	418.631	kWh	Electricity, Site
	24.600	24.739	33.732	45.595	40.582	l	Kitchen Oil - heating
	11.732	28.235	14.897	9.897	4.228	l	Biodiesel - heating
	3.000	0	0	0	0	l	Fuel oil - heating
	80.697	90.094	108.207	120.541	116.817	l	Biodiesel - transportation
	55.834	51.608	19.496	10.363	15.381	l	Diesel - transportation
	6.817	7.745	4.825	4.775	4.481	l	Diesel - machinery
	0	0	737	137	11	l	Biodiesel - machinery
	1.424	474	330	0	0	l	Petrol - transportation
converted in kwh[2)]	230.256	231.557	315.732	426.769	379.848	kwh	Kitchen Oil - heating
	99.018	238.303	125.731	83.534	35.684	kwh	Biodiesel - heating
	681.080	760.395	913.265	1.017.367	985.934	kwh	Biodiesel - transportation
	546.616	505.243	190.861	101.457	150.585	kwh	Diesel - transportation
	25.320	0	0	0	0	kwh	Fuel oil - heating
	66.738	75.824	47.237	46.747	43.869	kwh	Diesel - machinery
	0	0	6.220	1.158	95	kwh	Biodiesel - machinery
	6.702	2.224	599	1.281	1.354	kwh	Liquid gas - machinery
	12.343	4.113	2.861	0	0	kwh	Petrol - transportation
	33.467	66.226	100.858	184.251	193.336	kwh	Electricity transportation (Not included in total, as already included in electricity site)
Share of renewable energies in total consumption	65,80%	72,13%	87,31%	92,81%	90,29%		(Green electricity, kitchen oils, biodiesel)
Water[3)]	1.434	1.389	1.933	2.126	1.013	m^3	Electricity, Site
	1.008	836	1.276	1.414	509	m^3	Drinking water
	426	553	657	712	504	m^3	rain water
Property area	21.840	21.840	21.840	21.840	21.840	m^2	thereof
	17.940	17.940	17.940	17.940	17.940	m^2	sealed
	3.900	3.900	3.900	3.900	3.900	m^2	green area

[1)] Purchased quantities

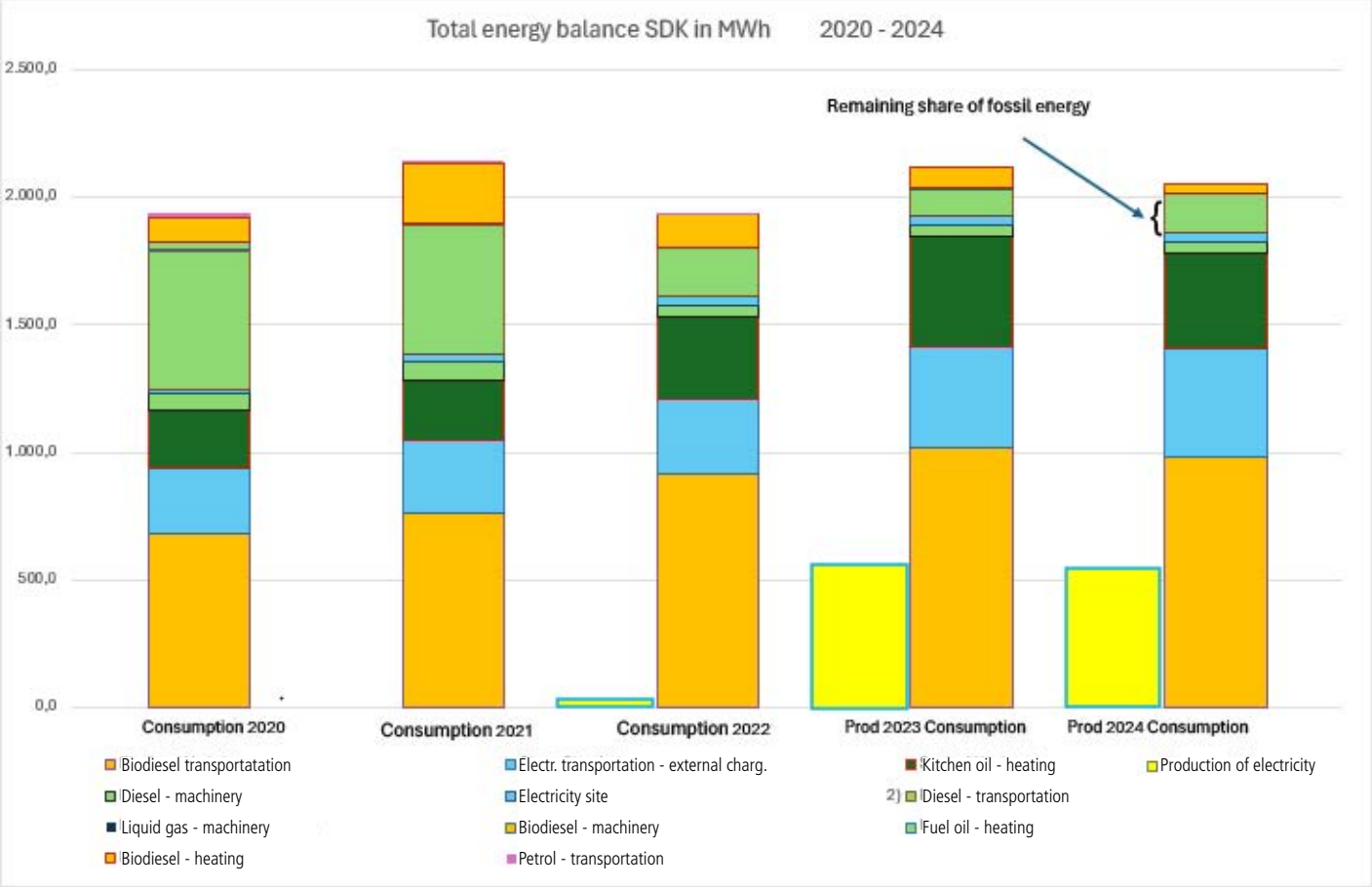
[3)] Water consumption from 2 metering points, consumption from 3rd metering point cannot be determined

[2)] Energy conversion
Kitchen oils; DIN EN ISO 3675, DIN EN ISO 51000-3
Base: Energieetikette für Personenwagen Schweizer Bundesamt für Energie Jan 2017
Conversion values kg to litres according to BDB- Bundesverband der deutschen Bioethanolwirtschaft
Deutscher Verband Flüssiggas e.V.

Kitchen Oil	9,36 kWh/l
Standard diesel	9,79 kWh/l
Biodiesel	8,44 kWh/l
Standard petrol	8,67 kWh/l
Liquid gas	7,17 kWh/l

5. 1 Direct environmental aspects

➤ Input - Energy balance



Energy balance with electricity consumption at the site and through external charging (blue), kitchen oil (red), biodiesel (yellow) and fossil diesel (2020 also heating oil) in MWh. The graph shows that the share of fossil fuels was significantly reduced in 2023 and 2024. Further details can be found on pages 21, 22 and 29.

➤ Output

	2020	2021	2022	2023	2024		
Electricity generation							
	0,00	0,00	9.563	575.999	550.123	kWh	PV installation since 30.11.2022

Emissions							Total, thereof
CO_2 [1]	152.878,11	137.793,68	52.544,24	27.879,75	41.097,98	kg	transportation
NO_x	356,84	352,41	347,66	355,07	365,97	kg	transportation
Feinstaub	10,23	9,97	9,92	10,24	10,32	kg	transportation
TOC	8,46	16,95	65,93	2,39	5,65	kg	Logistics center / hall 1 [2]
CO_2	19.320,73	20.689,38	12.761,49	12.894,12	12.135,13	kg	machinery [3]
CO_2	0	0	0	0	0	kg	from electricity [4]
CO_2	8760	0	0	44,92	19,19	kg	from heating [5]
CO	54	-	100,5	97	72	ppm	from heating [6]
Total CO_2 (Scope 1)	180.958,84	158.483,06	65.305,73	40.818,79	53.252,30	kg	

Waste	11.231	15.268	41.212	70.688	76.837	kg	Total, thereof [7]
			12.752	24.021	28.806	kg	from reverse production [8]
	624	300	270	7.700	9.850	kg	green waste/garden waste
	3.640	1.173	9.846	2.230	3.215	kg	old stock /archive
	2.700	8.442	14.472	32.358	31.413	kg	from oil-/grease separator
	4.267	5.353	3.872	4.379	3.554	kg	from office/administration

1) 2021 und 2022 only the CO_2 emissions caused by fossil fuels are shown here
2) As emissions are very low (maximum permitted value of 400 kg TOC), the influence of the ambient air is high.
3) The values were determined for the first time in 2020
4) 100% green electricity from renewable energies, therefore CO_2 neutral
5) In 2020, 3000 litres of heating oil were used as an exception; from 2023, the biodiesel share will be specified based on the value from the life cycle assessment
6) No measurement available for 2021; otherwise value from one measurement or average value
Commodo-Incommodo approval only requires random samples every two 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 onwards

1) Emissions: The calculation method was changed in 2021 and the data recalculated.
The data from the 2019 and 2020 environmental statements are therefore not comparable with the following.
Data basis for the new CO_2equ calculation: according to consumption in the DLSV guideline for calculating GHG emissions (tank to wheel) as of 2013 and from 2023: from Table K.1 - DIN EN ISO 14083:2023 Quantification and reporting of greenhouse gas emissions from transport operations (also tank to wheel)

Data basis for nitrogen oxides and particulate matter new: according to consumption in kWh/l - maximum values from the Euro 6 standard

Notes on the energy balance:

In 2024, 74.14 % of the vehicle fleet's energy consumption was covered by biodiesel purchased from partners who esterify the collected cooking fats/oils into biodiesel. As a result, the company's own activities have replaced fossil diesel and significantly reduced CO_2 emissions (see CO_2 balance sheet).

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

Details on the individual environmental aspects can be found on the following pages. Further information on the direct environmental aspects can be found in the Environmental Management Officer's 2024 report, which is available on request.

5.1 Direct environmental aspects

➤ Energy: electricity

Total electricity consumption rose by 7.4% to 418,631 kWh in 2024. This is due to the further increase in the proportion of charging current for electric vehicles as a result of the provision of company cars for commuting.

Since 2020, the share of electricity consumption by electric vehicles has been calculated by separating the different types of charging (charging at the logistics centre, public charging stations and private charging as reported by users). Charging at the logistics centre is carried out via eight charging stations, each with two charging points, as well as additional high-voltage sockets on the premises of the logistics centre, particularly in Hall 1 (warehouse entry and exit/return production). The estimated share of charging for electric vehicles at the logistics centre in 2024 was 157,485 kWh, corresponding to 37.62%.

Excluding consumption for charging electric vehicles, the **SDK** Centre's electricity consumption rose by only 2.2% from 255,587 kWh to 261,146 kWh, which is within the expected range of variation. In relation to the number of employees, consumption rose to 3723.21 kWh, which is also within the range of variation.

Green electricity

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

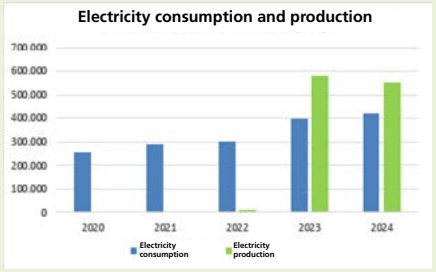
Electricity production

The PV system was connected to the grid on 30 November 2022. In 2024, it produced 550,123 kWh, corresponding to a positive balance of 131,492 kWh. Of the 550,123 kWh, 361,356 kWh were fed into the grid and 188,767 kWh were consumed directly.

Impact

By using electricity from renewable energy sources, the impact on the environment has been kept to a minimum. The consumption of fossil fuels is avoided. The use of green electricity is CO_2-neutral. Thanks to the PV system, the site produces a significant portion of its own consumption.

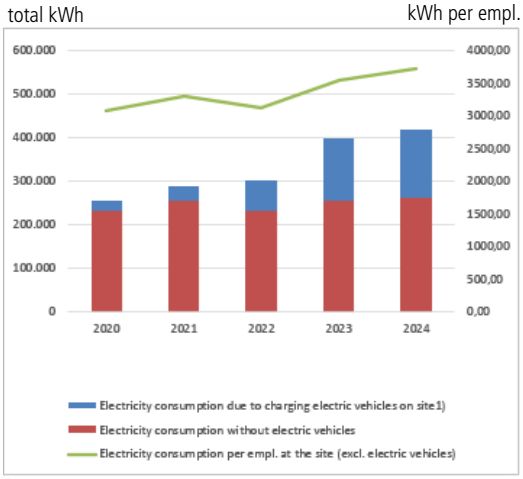
Photovoltaic (PV) system in 2022



power consumption

	2020	2021	2022	2023	2024	
Number of employees, adjusted*	75,37	77,24	74,36	71,96	70,14	
	2020	2021	2022	2023	2024	
power consumption	254.887	290.012	300.308	399.758	418.631	in kWh
electricity generation	0	0	9.563	575.999	550.123	in kWh
balance	-254.887	-290.012	-290.745	176.241	131.492	in kWh
Electricity consumption due to charging electric vehicles on site[1)]	21.888	35.018	68.272	144.171	157.485	
of which by electric vehicles[1)]	8,64%	12,07%	22,73%	36,06%	37,62%	
Electricity consumption without electric vehicles	232.999	254.994	232.037	255.587	261.146	
	2020	2021	2022	2023	2024	
Electricity consumption per empl. at the site (excl. electric vehicles)	3091,40	3301,32	3120,45	3551,79	3723,21	in kWh per empl.

[1)] Determined by user survey kWh/100 km, minus external charging



5.1 Direct environmental aspects

➤ Energy: heating

Heating

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

Total fuel consumption at the Colmar-Berg site amounted to 44,810 litres in 2024, of which 40,582 litres (37,538 kg) were waste cooking oils and 4,228 litres were biodiesel. Consumption has therefore fallen by 19.2% compared to the previous year. However, fluctuations due to weather and varying demand in reverse production must be taken into account here.

This means that over 90% of energy requirements were covered by used cooking oil. Both heating fuels save fossil raw materials. Expressed as CO2 equivalent, consumption corresponds to a saving of 111.2 tonnes of CO2 compared to 100% heating oil (see also climate balance).

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

Emissions and odours from the use of used cooking oil did not cause any problems.

Impact

The use of biodiesel and used cooking oil since 2015 has minimised the impact on the environment. Fossil fuels are generally not used, except in well-founded individual cases. The use of biodiesel and used cooking oil is CO2 neutral. Transport distances are minimised, especially with the use of used cooking oil, which is collected exclusively in Luxembourg.

[1] Calculated on the basis of 0.266 kg CO_2 /kWh according to the German Federal Environment Agency / Brandenburg State Office for the Environment 2017.

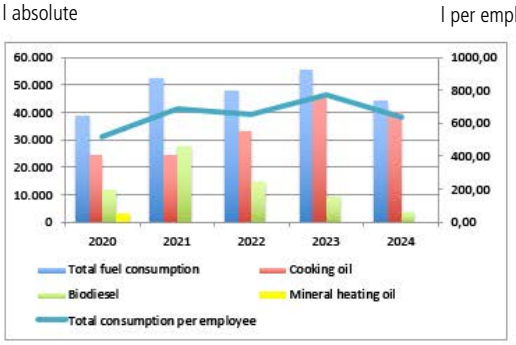
Treatment of used cooking oil for the heating system

Fuel consumption for heating

	2020	2021	2022	2023	2024	
Number of employees, adjusted*	75,37	77,24	74,36	71,96	70,14	
	2020	2021	2022	2023	2024	
Total fuel consumption	39.332	52.974	48.611	55.492	44.810	in l
Cooking oil	24.600	24.739	33.732	45.595	40.582	in l
Biodiesel	11.732	28.235	14.879	9.897	4.228	in l
Mineral heating oil	3.000	0	0	0	0	in l
	2020	2021	2022	2023	2024	
Total consumption per employee	521,86	685,84	653,72	771,16	638,87	in l pro MA
Cooking oil consumption per empl.	326,39	320,29	453,63	633,62	578,59	in l pro MA
Biodiesel consumption per empl.	155,66	365,55	200,09	137,54	60,28	in l pro MA
Mineral heating oil consumption per empl.	39,80	0,00	0,00	0,00	0,00	in l pro MA

Kitchen oil: Basic quantity balance for 2023
Biodiesel: Basic quantity balance for biodiesel in 2023

* full-time equivalents



5.1 Direct environmental aspects

➤ Water / waste water

Process water

Due to technical problems with the water meters on the part of the municipality of Colmar-Berg, only partial data on drinking water consumption for 2024 is available. Despite intensive efforts, there is no consumption data for one of the three metering points (Hall 1 – return production). It is possible that water quantities were measured and billed in previous years that were not consumed by the **SDK**. The balance is therefore limited to the two metering points for which measurement data is available (Infocenter and administration building including warehouse). The significant decline in drinking water consumption in 2024 is probably mainly due to two measures.

Firstly, the introduction of tarpaulins/canopies for containers with flammable products (oil filters and oil-containing operating materials), which makes the water cooling used in previous years unnecessary, and secondly, the fact that the green areas are only rarely watered with drinking water. It is also suspected that significant amounts of water were lost through leaks in 2022 and 2023.

Rainwater consumption also fell in 2024 to 509 m3 (previous year: 712 m3). Rainwater was used for cleaning containers and vehicles and for watering green areas.

Drinking water

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

Waste water

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

Impact

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

Rainwater supply[1)]

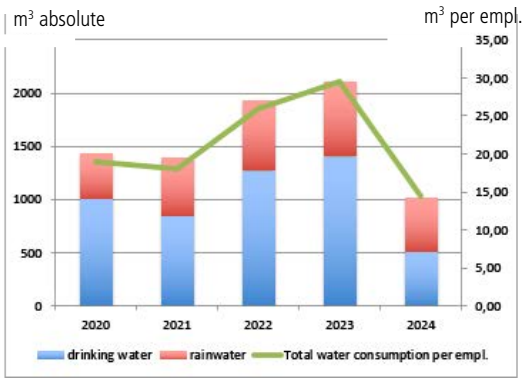
Drinking water from the water pipe

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

	2020	2021	2022	2023	2024	
Number of employees, adjusted*	75,37	77,24	74,36	71,96	70,14	
	2020	2021	2022	2023	2024	
Total water consumption	1434	1389	1933	2126	1013	in m³
drinking water	1008	836	1276	1414	509	in m³
rainwater	426	553	657	712	504	in m³
	2020	2021	2022	2023	2024	
Total water consumption per empl.	19,03	17,98	26,00	29,54	14,44	in m³ per empl.
drinking water per empl.	13,37	10,82	17,16	19,65	7,26	in m³ per empl.
rainwater per empl.	5,65	7,16	8,84	9,89	7,19	in m³ per empl.

[1)] excluding Hall 1 (reverse production), data not available

* full-time equivalents



5.1 Direct environmental aspects

➤ Biodiversity[1)] and land use

Green areas

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

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

To improve biodiversity, nesting aids and an insect hotel have been installed. A compost heap also contributes to biodiversity. In 2020, another large insect hotel was built in the area adjacent to the residential neighbourhood near the flower meadow. In 2025, there are plans to remove the spruce trees and cherry laurel at the visitor entrance and replace them with native and climate-change-resistant plants.

Land use

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

Pesticides

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

Impact

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

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

[1)] The **SDK**'s biodiversity strategy takes into account the 2023 guidelines on EMAS and biodiversity published by the Lake Constance Foundation and the Global Nature Fund with support from the European Commission's DG Environment.

High-stemmed fruit tree

Insect hotel and bird feeder

Administration building extension

Large insect hotel and flower meadow

5.1 Direct environmental aspects

➤ Emissions

The emission measurements on 5 June 2024 to monitor compliance with AGW values (emissions in workplace air) were carried out by Luxcontrol. Luxcontrol certified that the AGW value for respirable dust and alveolar dust as well as for VOC and mercury was significantly (< 10%) below the corresponding AGW values.

The emission measurements in the exhaust air (dust, heavy metals and VOCs) were carried out on 10 November 2022. The values were all significantly below the respective specific limit values. No measurements were taken in 2024.

Sorting and transfer station with filter system and continuous emission monitoring

Washing area with oil and grease separator

Heating system

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

Transport

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

Impact

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

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

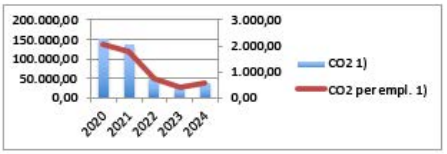
emissions from transport

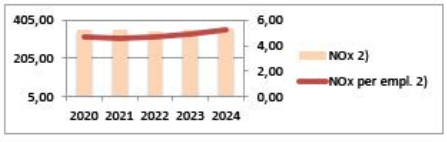
	2020	2021	2022	2023	2024	
Number of employees, adjusted*	75,37	77,24	74,36	71,96	70,14	
	2020	2021	2022	2023	2024	
CO_2 [1]	152.878,11	137.793,68	52.544,24	27.879,75	41.097,99	in kg
NOx [2]	356,84	352,41	347,66	355,07	365,07	in kg
particulate matter [2]	10,23	9,97	9,92	10,24	10,32	in kg
	2020	2021	2022	2023	2014	
CO_2 per empl. [1]	2.028,37	1.783,97	706,62	387,43	585,94	in kg per empl. ↗
NO_x per empl. [2]	4,73	4,56	4,68	4,93	5,20	in kg per empl. →
particulate matter per empl. [2]	0,14	0,13	0,13	0,14	0,15	in kg per empl. ↘

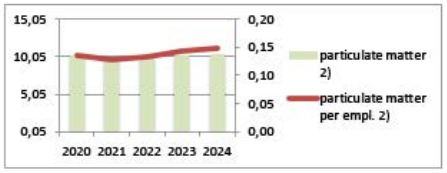
*Vollzeitäquivalente

[1] In 2020 and 2021, only CO_2 emissions caused by fossil fuels were included. Transport performance using biodiesel as fuel and electricity was not included. From 2022: According to the life cycle assessment, biodiesel from used cooking oil is included in biodiesel at a value of 0.004539 kg CO_2e/l. Electricity is still not included.
Values for 2021–2023 slightly corrected compared to previous reports.
[2] Only emissions caused by fuels are listed here. Traffic performance for which electricity was used from 2017 onwards is not included.

kg absolute kg per empl.







The calculation method was changed in 2021 and the data from 2017 onwards has been recalculated. The data from previous years' environmental statements is therefore not comparable.
Data basis for CO2equ calculation: according to consumption in DLSV guideline Calculation of GHG emissions (tank to wheel) as of 2013-03
New: 2023 and 2024 Value from Table K.1 – DIN EN ISO 14083:2023 Quantification and reporting of greenhouse gas emissions from transport operations
New data basis for nitrogen oxides and particulate matter: according to consumption in kWh/l – maximum values from the Euro 6 standard

5.1 Direct environmental aspects - Emissions

Preliminary CO_2 balance sheet according to the GHG Protocol

20In 2020, the SDK drew up its first CO_2 balance sheet based on the international Greenhouse Gas Protocol (GHG) standard by identifying and quantifying direct and indirect greenhouse gas emissions to the extent possible. A Climate Council has been in place since 2021.

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

The 2024 balance sheet showed a calculated footprint of 1,255.33 tonnes of CO_2 equivalents and calculated savings of 2,835.13 tonnes of CO_2 equivalents. The climate protection report shows the footprint and savings separately in detail and explains them as required by the standards.

Scope 1 - direct emissions

Direct emissions in 2024 amounted to:

➜ Transport: 41.1 tonnes of CO_2 equivalents from vehicles (trucks, vans, cars). In 2019, this figure was 194.4 tonnes of CO_2 equivalents (a reduction of almost 79%). This is due to the sharp increase in the use of biodiesel and electric vehicles.

➜ Heating/heat: Through the direct use of collected used cooking oil and biodiesel in the central heating system, a total of 111.19 tonnes of CO_2 equivalents were avoided, which would have been produced when using fossil fuel oil.

➜ Machinery: This applies to high-pressure cleaners, roller packers (compactors) and sweepers. The existing gas-powered forklift truck was replaced by an electric forklift truck in 2021. Various measures (replacement of fossil diesel with biodiesel, new second-hand gas-powered sweeper that uses gas from collected gas cylinders, etc.) have reduced emissions to 12.1 tonnes of CO_2 equivalents.

If the emissions avoided through the use of used cooking oil and biodiesel in heating were credited, the consumption of the vehicle fleet and machinery would already be significantly offset.

Scope 2 - indirect emissions

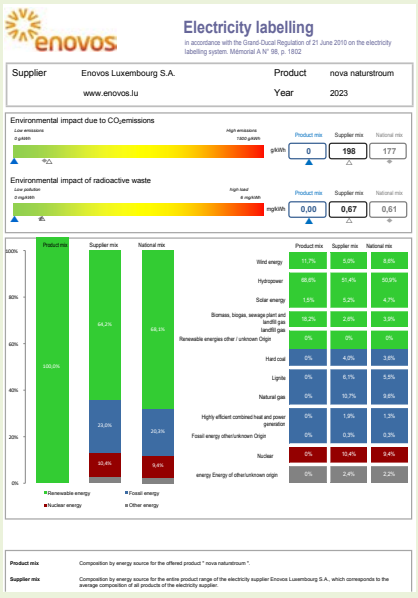
Indirect emissions amounted to:

➜ Electricity consumption location: This was sourced by Electris in the best green electricity category 1. The electricity label for the corresponding category at enovos – Nova Naturstrom for this product in accordance with the Grand Ducal Regulation of 21 June 2010 shows 0 kg CO_2 equivalents.

➜ Electricity production: In 2024, 131.492 MWh more electricity was produced than consumed. The CO_2 savings achieved through the use of natural electricity and the production of green energy amount to a total of 138.1 tonnes of CO_2 equivalents compared to the national electricity mix.

➜ Electric vehicles: These are charged on site via the national Chargy system and by private charging. In general, the use of electric vehicles is also reported here with a value of 0 kg CO_2 equivalents, as they are powered to a very high degree by green electricity.

SDK – climate protection in action
Link to the current climate protection report



Electricity mix from nova-Naturstrom 2023

Translation of the German original

5.1 Direct environmental aspects - Emissions

Scope 3 - indirect emissions

Data on Scope 3 emissions were collected in full for the first time in 2023 for the reporting year 2022. The 2024 climate balance is presented below. The complete detailed climate protection report for the reporting year 2024 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.). Purchases are made 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 were calculated here.

➜ **3.2** Capital goods
Purchases are made 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 accounts for 369.60 tonnes of CO_2 equivalents.
Electric vehicles: The upstream chain, production and downstream chain of four vehicles purchased in 2024 account for 97.7 tonnes of CO_2 equivalents.
Other major purchases in 2024 included one truck trailer, additional reusable containers, furniture and furnishings, and electrical/IT equipment.
In 2024, a total of 557.20 tonnes of CO_2 equivalents were calculated here.

➜ **3.3** Upstream-chain fossil fuels used
In 2024, a total of 80.80 tonnes of CO_2 equivalents were 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 were calculated here.

Scope 3b - indirect site-related emissions

➜ **3.5A** Own waste: Waste produced by the company is managed in accordance with the **SDK fir Betriber** concept and is focused on prevention. With a few exceptions, this is handled by the logistics centre (included in 3.5B).

➜ **3.5B** Waste collected and treated, which is handled via the **SDK** logistics centre: The resource potential concept gives preference to sustainable and resource-oriented treatment and recycling processes.

In total, the management of our own and third-party 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 (air, rail, private cars) generated emissions of only 1.2 tonnes of CO_2 equivalents in 2024.

➜ **3.7** Commuting: In autumn 2022, all employees who had been with the company for two years or more and did not yet have a company car were provided with electric vehicles, which are mainly charged on site using electricity generated in-house. This means that only 26.16 tonnes of CO_2 equivalents will remain in 2024.

Scope 3c - indirect emissions from downstream activities

Only category 9 is relevant here.

➜ **3.9** Downstream transportation and distribution

This includes travel by training and meeting participants as well as employees employed by Ligue HMC. In 2024, a value of 36.86 tonnes of CO_2 equivalents was calculated here.

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

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

5.1 Direct environmental aspects

➤ Waste products

As part of its reporting obligations to the environmental agency, SDK keeps a particularly accurate and detailed list of the waste it produces. This is evaluated by the environmental management officer and categorised for a better overview.

In 2024, including waste from reverse production, 76.837 tonnes of waste were produced (compared to 70.688 tonnes in the previous year). Waste from reverse production increased by just under 20% to 28.81 tonnes. Unlike waste generated internally, waste from reverse production is non-cyclical and depends on the type and quantity of external waste collected and treated.

The amount of separator contents and green waste remained at the previous year's level. As mentioned above, an annual comparison is generally not meaningful, as waste from reverse production, separator contents, old stocks and green waste are non-cyclical. Internal waste amounted to 3,554 kg in 2024.

This represents a significant decrease of 18.8% compared to 4,379 kg in 2023. This is mainly due to the sharp decline in residual waste. In 2024, a brown bin was purchased for the separate disposal of organic/food waste, which was composted in previous years.

Internal waste collection station

Impact

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

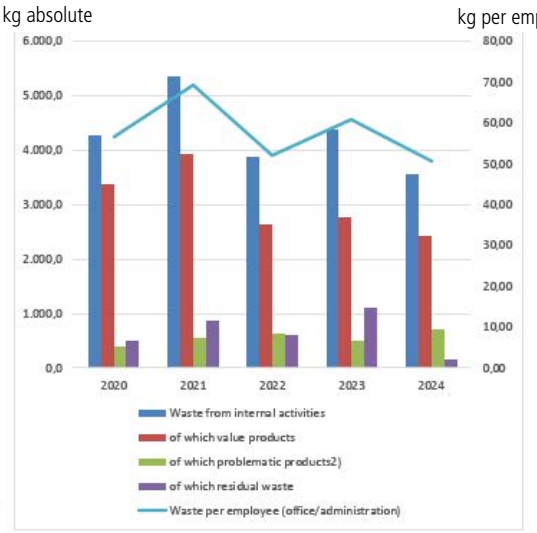
As part of the resource potential, the SDK checks the reverse production processes at the product recipient. Inspection and certification are carried out in accordance with the ISO 14024 standard, with the aim of maximising the proportion of material recycling (reuse of raw materials - circular economy).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

	2020	2021	2022	2023	2024	
Number of employees, adjusted*	75,37	77,24	74,36	71,96	70,14	
Total waste	11.230,5	15.268,3	41.211,6	70.687,8	76.837,4	in kg
Waste from reverse production	not raised	not raised	12.751,8	24.020,9	28.805,9	in kg
Oil and grease separator contents/sludge[1) 2)]	2.700,0	8.442,0	14.472,0	32.358,0	31.412,5	in kg
Old stock / archives / special settlements[3)]	3.639,5	1.173,0	9.845,9	2.229,9	3.215,0	in kg
Excavated earth/construction waste/green waste	624,0	300,0	270,0	7.700,0	9.850,0	in kg

	2020	2021	2022	2023	2024	
Waste from internal activities	4.267,0	5.353,3	3.871,9	4.379,0	3.554,0	in kg
of which value products	3.375,8	3.932,9	2.645,0	2.769,6	2.424,9	in kg
of which problematic products[2)]	400,3	551,4	619,4	505,9	705,1	in kg
of which organic waste	not raised	not raised	not raised	not raised	264,0	in kg
of which residual waste	490,9	869,0	607,5	1.103,5	160,0	in kg

	2020	2021	2022	2023	2024	
Waste per employee (office/administration)	56,61	69,31	52,07	60,85	50,67	in kg per empl.

* full-time equivalents



5.1 Direct environmental aspects

➤ Traffic/transport

Vehicles and mobility

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

The mileage in 2024 was 1,775,844 km, representing a slight decrease (2.0%) compared to the previous year's figure of 1,813,313 km. In 2023, mileage rose by 39.9% compared to 2022. This was due to the sharp increase in passenger cars (up 54.5%) as a result of the provision of company cars for commuting. The use of renewable electricity (PV system) to charge the cars and the savings in fossil fuels by employees (until 2022, most of the journeys to and from work were made by cars with combustion engines) have a significant positive impact on the carbon footprint.

Fuels / energy

Due to the high number of company cars, consumption was 1,329,854 kWh (similar to the previous year). Of this, 790,344 kWh (59.4%) was accounted for by trucks, 118,074 kWh (8.9%) by information vehicles and door-to-door collection vehicles, and 421,437 kWh (31.7%) by cars.

The share of fossil fuels in 2024 was 11.32%. 74.14% was covered by biodiesel. The share of electricity from electric vehicles (mainly green electricity) was 193,336 kWh, or 14.54% (compared to 14.17% in the previous year).

The average fuel consumption of the trucks was 482.05 kWh/100 km (approx. 53.56 l), while that of the door-to-door collection vehicles was 98.88 kWh/100 km (approx. 10.99 l). The fuel consumption of passenger cars was 28.24 kWh/100 km. These figures are on a par with last year's figures.

Use of Biodiesel

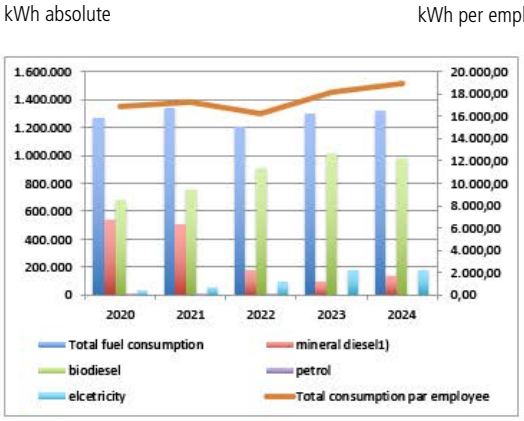
Fuelling station with waste collection station

E-vehicles at the charging stations

Energy consumption for mobility (in kWh)

	2020	2021	2022	2023	2024	
Number of employees, adjusted*	75,37	77,24	74,36	71,96	70,14	
	2020	2021	2022	2023	2024	
Total fuel consumption	1.273.506	1.335.978	1.207.846	1.303.076	1.329.855	in kWh
mineral diesel[1]	546.616	505.243	190.861	101.457	150.585	in kWh
biodiesel	681.080	760.395	913.265	1.017.367	985.934	in kWh
petrol	12.343	4.113	2.861	0	0	in kWh
elcetricity	33.467	66.226	100.858	184.251	193.336	in kWh
	2020	2021	2022	2023	2024	
Total consumption par employee	16.896,73	17.296,45	16.243,22	18.108,33	18.960,01	in kWh per empl.
mineral diesel par employee[1]	7.252,43	6.541,22	2.566,72	1.409,91	2.146,92	in kWh per empl.
biodiesel par employee	9.036,49	9.844,58	12.281,67	14.137,95	14.056,66	in kWh per empl.
petrol par employee	163,76	53,25	38,48	0,00	0,00	in kWh per empl.
elcetricity par employee	444,04	857,41	1.356,35	2.560,47	2.756,43	in kWh per empl.

[1] Values for 2021–2023 slightly adjusted compared to previous reports.
* full-time equivalents



5.1 Direct environmental aspects

➤ Paper consumption

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

➤ Hazardous substances

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

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

➤ Noise

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

➤ Traffic volume

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

Impact

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

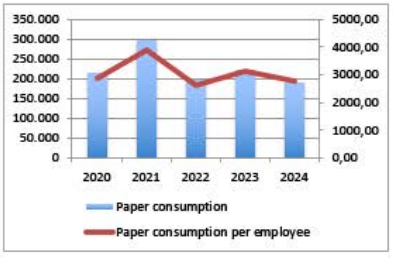
Paper consumption

	2020	2021	2022	2023	2024	
Number of employees, adjusted*	75,37	77,24	74,36	71,96	70,14	
	2020	2021	2022	2023	2024	
Paper consumption (Annual purchase, converted to A4)	215.000	301.500	195.500	223.000	194.000	pages
	2020	2021	2022	2023	2024	
Paper consumption per employee	2852,59	3903,42	2629,10	3098,94	2765,90	pages per empl.

average 2020-2024 225.800,00 pages

* full-time equivalents

Sheets A4 absolute Sheets A4 per empl.



5.1 Direct environmental aspects

Contingency planning for operational incidents

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

The hazard warning system is the central instrument in which all information from the leakage and Ex sensors, the fire alarm system and the operating status of essential safety equipment is collected. The messages accumulated in the hazard warning system are transmitted by SMS to the smartphones of the emergency response team, the warehouse coordinator, the plant security and the safety officer. The messages are also displayed on PCs in the plant security reception, the administration, the warehouse coordinator's office and the technical room. In addition, the messages can also be displayed in an app available to plant security and the emergency response team.

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

- Annual maintenance of the fire alarm control panels was carried out on 23 October 2024. Maintenance of the hazard alarm system was carried out on 25 November 2024.
- Annual maintenance of the smoke and heat exhaust vents was carried out on 28 March 2024.
- Inspections of the EX sensors on 15 April 2024 and 20 October 2024.
- Inspections of the fire extinguishing system on 30 April 2024 and 14 October 2024.
- Annual maintenance of the fire extinguishers on 25 and 26 March 2024.
- Annual maintenance and repair of fire water barriers on 5 September 2024.
- Inspection of first aid kits on 5 December 2024.
- Annual maintenance of the VOC system sensors on 9 April 2024 and 14 October 2024.

The safety officer's report lists all maintenance and repair work carried out in 2024.

Evacuation and fire drills

Evacuation drills were conducted for each specific area in accordance with the operating instructions. Training on the practical use of small fire extinguishers was provided.

A drill involving external emergency services (CGDIS) was last held on 16 December 2023.

Since the Colmar-Berg logistics centre went into operation in 1990, there have been no incidents/accidents with significant environmental impact.

All incidents in 2024 are listed in the safety officer's report.

5.1 Direct environmental aspects

Environmental performance indicators – summary of key performance indicators

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

Figure A - Total annual impact of direct environmental aspects

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

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

➤ Key performance indicators 2020 - 2024

Key indicators		2020	2021	2022	2023	2024		
Number of employees (full-time equivalents)	B	75,37	77,24	74,36	71,96	70,14		
Paper consumption	A	215.000	301.500	195.500	223.000	194.000	sheet	
Paper consumption per employee	R	2.852,59	3.903,42	2.629,10	3.098,94	2.765,90	sheets per employee	
Water	A	1.434	1.389	1.933	2.126	1.013	in m^3	
Water consumption per employee	R	19,03	17,98	26,00	29,54	14,44	in m^3 per employee	
Drinking water consumption per employee	R	13,37	10,82	17,16	19,65	7,26	in m^3 per employee	
Rain water consumption per employee	R	5,65	7,16	8,84	9,89	7,19	in m^3 per employee	
Energy efficiency								
Electricity	A	254.887	290.012	300.308	399.758	418.631	in kWh	
Electricity consumption per employee	R	3.381,81	3.754,69	4.038,57	5.555,28	5.968,51	in kWh per empl.	Strong increase due to electromobility
Heating								
Total consumption per employee	R	521,85	685,84	653,73	771,15	638,87	in l per empl.	Since 2016, only fuels from
Consumption of kitchen oil per employee	R	326,39	320,29	453,63	633,62	578,59	in l per empl.	renewable sources have been
Biodieselconsumption per employee	R	155,66	365,55	200,09	137,53	60,28	in l per empl.	used to heat the logistics centre
Fuel oil consumption per employee	R	39,80	0,00	0,00	0,00	0,00	in l per empl.	(exception 2020).
Mobility								
Fuel (transport)	A	1.273.506	1.326.077	1.207.845	1.303.075	1.329.855	in kWh	
Total consumption per employee	R	16.897	17.168	16.243	18.108	18.960	in kWh per empl.	The proportion of fuel from
Consumption of fossil diesel per employee	R	7.252	6.541	2.567	1.410	2.147	in kWh per empl.	renewable sources (biodiesel and
Consumption of biodiesel per employee	R	9.036	9.845	12.282	14.138	14.057	in kWh per empl.	electricity) was 88,68 % in 2024.
Consumption of pertrol per employee	R	164	53	38	0	0	in kWh per empl.	
Electricity consumption for mobility per employee	R	444	857	1.356	2.560	2.756	in kWh per empl.	Included in total electricity consumption.
Electricity production								
per employee	R	0,00	0,00	128,60	8.004,43	7.843,21	in kWh per empl.	Production started on 30.11.2022
Emissions from transport								
CO_2 per employee	R	2.028,37	1.783,97	706,62	387,43	585,94	in kg per empl.	
NO_x per employee	R	4,73	4,56	4,68	4,93	5,20	in kg per empl.	
Particulate matter per employee	R	0,14	0,13	0,13	0,14	0,15	in kg per empl.	CO_2: see note [1)] on page 25.
Waste in total	A	11.231	15.268	41.212	70.688	76.837	in kg	The figures for 2020–2021 and
of which oils/greases/separator contents	A	2.700	8.442	14.472	32.358	31.413	in kg	2022–2024 are not comparable.
of which problematic waste from office/admin.	A	400	551	619	506	705	in kg	The total figure from 2022
of which other waste from office/administration	A	3.867	4.802	3.253	4.379	3.554	in kg	onwards includes the decline in
Office/administrative waste - total per employee	R	56,61	69,31	52,07	60,85	50,67	in kg per empl.	reverse production, which was only partially taken into account in previous years.
Space consumption	A	21.840	21.840	21.840	21.840	21.840	m^2	
Space consumption per employee	R	289,77	282,76	293,71	303,50	311,38	m^2 per empl.	

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

5.2 Indirect environmental aspects

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

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

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

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

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

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

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

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

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

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

➤ Packaging / consumables

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

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

➤ Suppliers and service providers

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

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

➤ Product recipients

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

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

➤ Transporters

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

➤ Information for employees and customers

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

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

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

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

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

➡ Quantities of problematic products collected from private households

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

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

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

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

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

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

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

Environmental status indicators are also included.

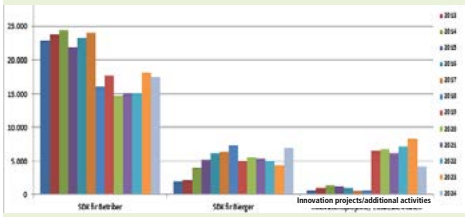
Both environmental management indicators and environmental status indicators are based on the requirements of ISO 14031.

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

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

➤ Advice for citizens and companies/institutions

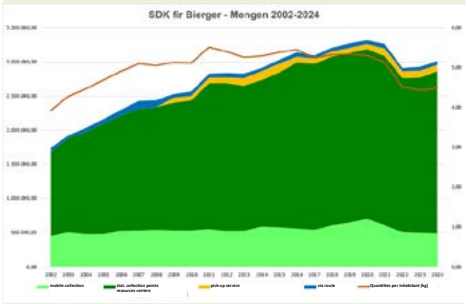
The number of contacts by email or telephone in 2024 remained at the same level as in the previous year. Of the 28,647 customer communications, 17,504 related to **SDK fir Betriber**, 6,890 to **SDK fir Bierger** and 4,253 to additional activities.



Advice by phone and e-mail 2012-2024

➤ Problematic products collected from citizens

The total amount of waste - **SDK fir Bierger** - collected in 2024 was 3,014.5 tonnes. This represents an increase of 2.7% compared to 2023. The population rose by approximately 1.7% to 672,050 people during the same period. The recorded amount of problem products per year and inhabitant thus rose slightly to 4.49 kg. This figure is generally positive, which is also confirmed by the results of the national residual waste analysis.



Recorded quantities of problematic products from private households 2002 - 2024

➤ Waste products treated at the logistics centre

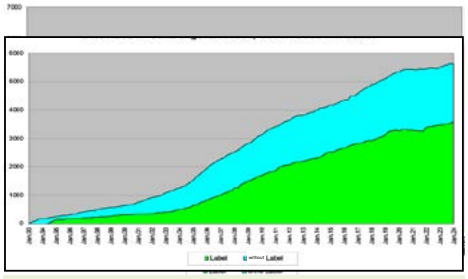
In 2024, 4,556.2 tonnes of valuable and problematic products were received at the logistics centre. In 2023, the figure was 4,491.6 tonnes. This represents a slight increase of 1.4%. In 2024, 4,571.5 tonnes were transported from the logistics centre to the product recipients. In 2023, the figure was 4,426.5 tonnes, which is 3.3% more than in the previous year.

➤ Quality assurance by the SDK laboratory

The number of samples for "products" and "unknown products" was significantly higher in 2024 than in previous years, with a total of 2,311 samples. The number of analyses of indoor air/radioactivity and special batches was significantly lower than in the previous year, at 7,941. Both tasks are non-cyclical. Details can be found in the annual report.

➤ Concepts for companies/institutions

As of 31 December 2024, 5,840 institutions were affiliated. Among other things, 2,398 analyses and concepts were prepared and 2,268 label audits were carried out. A total of 7,410 visits were made to institutions. These included 344 initial consultations and 30 training courses. The number of labelled facilities was 3,717 on 31 December 2024, representing a share of 63.6% (same as the previous year). The number of employees at the affiliated facilities was 302,336 on 31 December 2024.



Companies affiliated and label-certified 2024

➤ Audits of partners and product recipients

During 2024, 44 meetings were held with product recipients. The resource potential tool was also applied (see point 2 – Consulting/Sales). In addition, there were 33 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 was updated for most product streams.

In 2024, of the 18 cooperation partners who signed the convention updated in 2022, nine were awarded the SDK quality label, all with a diploma (five years or more with the label).

Link to the current annual report

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

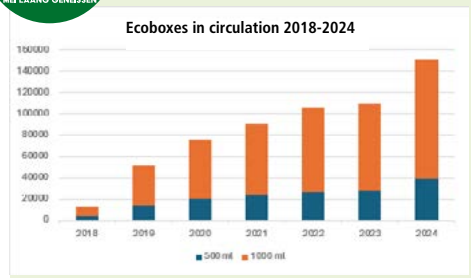
➤ SDK fir Bierger and extra activities

Shop Green

The "Clever akafen" (shop smart) campaign was renamed "Shop Green" in 2022. The reason for this was the desire of retail partners to emphasise more clearly that the campaign promotes environmentally friendly products. The nationwide campaign, which has been recognised by the European Commission, promotes environmentally friendly and low-waste products in shops with the slogan "Shop Green". As of 31 December 2024, 155 shops were participating in the campaign.

Clever Iessen

The campaign to promote reusable containers for taking food away from restaurants, canteens, takeaways, etc. was launched in June 2018 and continued to develop positively in 2024. On 31 December 2024, 141 restaurants and 161 canteens/school canteens were participating in the campaign. By that date, 38,967 500 ml containers and 111,567 1000 ml containers, i.e. over 150,000 containers, had been distributed.

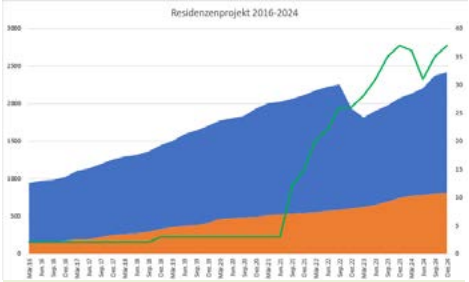


Resources potential

The concept allows the recycling or disposal processes (reproduction processes) at the waste recipient (product recipient) to be examined and evaluated in terms of resource efficiency. As of 31 December 2024, a total of 133 reverse production processes had been certified by 47 partners of the **Aktioun SuperDrecksKëscht®** and other stakeholders.

Ecological waste management in residential buildings

As of 31 December 2024, a total of 88 property management companies with 5,941 residences were active. Of these, 939 residences were furnished. The number of residences awarded the label remained at 37 in 2024.



Residential buildings registered and equipped 2024

Repair & Share

The overall goal of the online platform is to extend the life of goods in the interests of resource efficiency and to reduce resource consumption through shared use. "Flécken a Léinen" was renamed "Repair & Share" in 2022. As of 31 December 2024, 123 businesses offering repair services and 33 businesses offering rental services were registered.

➤ SDK-Akademie

The SDK Academy is a comprehensive tool that serves to raise awareness, provide information and offer training as part of the activities of the **Aktioun SuperDrecksKëscht®** (**SDK fir Bierger, SDK fir Betriber** and additional activities). As part of its efforts to raise public awareness, the **SDK** took part in 15 events in 2024. In 2024, there were a total of 130 internal training courses. Detailed information can be found in the SDK Academy annual report.

6. Environmental programme - update and current projects 2024 - 2027

The updated environmental programme of the **SuperDrecksKëscht campaign®** is presented below. In line with the tasks set as part of the national sustainability strategy, the objectives relating to indirect environmental aspects predominate here.

It is also difficult to quantify the targets relating to direct environmental aspects. Further targets (1, 2 and 7) were added in 2021 and 2022.

Direct environmental aspects

Target	**1. Climate neutrality or positive climate balance by 2025**
Measures	Further development of the climate protection balance sheet and climate protection report to Scope 3. Preparation of a complete climate balance sheet with Scope 3 since 2022.
Responsible	Directorate, SDK **Climate Council**
Deadline	Ongoing; target remains at 31.12.2025
Status	Publication of 3 climate protection reports 2019-2021 with ongoing addition of Scope 3 data. Complete climate protection report incl. Scope 3 since 2022.
Evaluation	Positive development. The commissioning of the PV system in 2022 and the extensive conversion of the car fleet to e-vehicles have significantly reduced the CO_2footprint. However, the expansion of the PV system and the optimisation of the heating system have been delayed due to supply bottlenecks.

Target	**2. Circular economy: Closing regional material cycles through cooperation with local producers**
Target Measures	Promotion of SDK Circular products; goal of introducing further SDK Circular products remains in place. Management, coordination of additional activities
Responsible	Ongoing; target remains: at least 1 additional **SDK** Circular product by 31 December 2025
Deadline	SDK Circular label; ensuring legal compliance with authorities; management of existing SDK Circular products; another product could be realised in 2023 with the Ecobloc. Further examination of which waste products are suitable.
Status	SDK-Circular is not the only tool to support the circular economy. SDK generally provides particularly intensive support to all stakeholders who promote the circular economy.
Evaluation	

Goal	**3. Optimisation of disposal logistics to reduce energy consumption**
Measures	No specific new measures. Monitoring of the existing status.
Responsible	Management, coordination of collection logistics
Deadline	Renewed review as at 31.12.2025
Status	The optimisation of route planning using GPS monitoring was implemented using the 'Webfleet' system.
Evaluation	The goal of optimising logistics has largely been achieved through the purchase of new low-emission vehicles (see below), high capacity utilisation and the Webfleet system. The kilometres driven in the logistics area are at a constant level and can hardly be reduced any further.

Direct environmental aspects

Target	**4. Production of electricity**
Measures	Installation of a PV system completed. Commissioning (grid connection) on 30 November 2022. Expansion of the system in 2024 (installation of modules, commissioning/grid connection not yet possible).
Responsible	Management, coordination of innovation
Deadline	not applicable
Status	Electricity production is running. In 2024, the PV system produced 550.123 MWh of electricity, corresponding to a saving of 97.37 tonnes of CO_2equivalents in relation to the national electricity mix.
Evaluation	Target successfully implemented.

Goal	**5. Reduce emissions caused by vehicles (CO_2, nitrogen oxides, particulate matter) by 20 % by 2023 compared to 2014**
Measures	2020/2021: Increased use of public transport; purchase and replacement of existing vehicles Mileage was reduced by increasing home office (partly due to COVID, but also partly due to improved work organisation, which was launched at the end of 2019). Continuation of measures 2022 - 2024: Further increased use of public transport; further replacement of fossil-fuelled vehicles with electric drives or climate-neutral fuels.
Responsible	Directorate, Innovation Coordination
Deadline	Ongoing annual review as part of the climate protection review
Status	As part of the climate protection strategy, all employees who have been with the company for 2 years or more were offered a company e-vehicle in 2022. By expanding the charging infrastructure, the electricity produced by the PV system can be used directly for the vehicles. At the end of 2024, there were a total of 56 e-vehicles in the vehicle pool.
Evaluation	CO_2emissions in 2023 were 67.3% lower than in 2014, NO_xemissions fell by 42.6 %, while particulate matter emissions fell by just 9.6 %. The target was therefore more than achieved. Even emissions were at a comparably low level in 2024 (see also climate protection report).

Goal	**6. Reduce paper consumption by 40% per employee through digitalisation by 2023 compared to 2014; new target date 2027**
Measures	completed in 2020, among other things: Expansion of the functions of the customer portal; introduction of a digital document management system for advisory services; use of e-papers for media. Measures since 2022: Continuation of digitalisation measures, digital holiday applications and management; expansion of the ELO tool to other areas is also underway in 2024.
Responsible	Directorate, IT/IT coordination, consulting coordination
Deadline	Renewed review by 31 December 2025 at the latest
Status	Further digitisation measures are underway, e.g. expansion of the ELO archiving tool to other departments.
Evaluation	Target not achieved. There is a downward trend, but not a significant decline. This is more of a medium-term target. New target for 2027.

6. environmental programme - update and current projects 2024 - 2027

Direct environmental aspects

Goal	**7. Warehouse logistics: Switch from fossil-fuelled machines to renewable sources (new 2022)**
Measures	Measures 2023: Further optimisation, replacement of machines (electric high-pressure cleaners)
Responsible	Management, coordination of innovation, coordination of reverse production
Deadline	Renewed review by 31.12.2025 at the latest
Status	Measures implemented as far as possible.
Evaluation	Positive development. The fuel consumption figures for machines in 2023 show that the changeover has already been largely successful. Further improvements are currently not possible, as they are not economically viable and do not make sense in terms of the carbon footprint.

Indirect environmental aspects

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

Goal	**1. Increasing the consumption of sustainable products (non-food sector) - Shop Green**
Measures	Constant adaptation/further development of the criteria; 2019: increased inclusion of packaging (sustainability, circular economy); update of criteria; review of further possible product categories 2020: Updating of criteria; start of market analyses 2021: Further development of the concept, market support and qualification of sales staff 2022: Renaming of 'Clever akafen' to 'Shop Green'. Reason: request from retail partners to emphasise more clearly that it is about promoting environmentally friendly products 2023 Market support; inclusion of the 'Leave on' product category in personal care products, development of an online tool to inform and sensitise retail employees 2024: Introduction of the 'Leave on' product group; further intensive market support
Partner	Retailers, suppliers, manufacturers, Confédération (de commerce), Union Luxembourgeoise des Consommateurs, ministries, EBL
Responsible	Management, coordination of consulting and additional activities, coordination of
Deadline	communication Renewed audit by 31.12.2025 at the latest
Status	Successful implementation of the changeover from 'Clever akafen' to 'Shop Green'. Further development with the existing existing tools, especially the ongoing market analyses.
Evaluation	The market analyses were continued in 2024. The response to Shop Green continues to be positive from both retailers and consumers.

Indirect environmental aspects

Goal	**2. Welcome set and information sheet - information for citizens and new residents of municipalities to support separation and waste prevention**
Measures	Promotion via the advisory service; placement of welcome sets in municipalities/syndicates 2021: Carry out a market analysis to determine current needs. Based on the results of the market analysis, the distribution of the welcome set will be continued according to the wishes/requirements of the municipalities. 2022-2023: The distribution of the welcome set will be continued in accordance with the wishes/requirements of the municipalities. ongoing from 2023: Sending out the information sheet for publication in the municipal newsletters. Producer systems: Ecotrel, Ecobatterien, Valorlux, as well as the municipalities and municipal syndicates
Partner	Management, Coordination Consulting & Innovation Projects and Coordinator Communication Re-
Responsible	examination by 31.12.2025 at the latest
Deadline	The welcome kit was only used a few times in 2024. In contrast, the information sheet is increasingly accepted. 65 out of 100 municipalities show their interest by placing their municipal logo.
Status	Other municipalities will not use the welcome pack. Instead, they will increasingly use other tools such as the information sheet for municipal newsletters.
Evaluation	

Target	**3. Integration of sustainability topics in schools**
Measures	2018: Development of concrete, practical documents in line with the curricula; test in selected partner schools; topics of sustainable waste management, sustainable consumption, sustainable living in the community, ... 2019: Expansion to national level; further projects: joint development and use of practical material (media, films, stories, posters) on the topic of sustainable consumption; YouTube channel 2020: Further development of digital offerings (e.g. YouTube tutorials). from 2021 ongoing : To be pursued further: Development and use of practical material (media, films, stories, posters) on the topic of sustainable consumption 2024: Further digital offer (example VR) via the so-called 'Circular-Lab' (a mobile games laboratory) Primary
Partners	schools, lycées, Maison Relais
Responsible	Management, coordination SDK Academy
Date	Re-examination by 31 December 2025 at the
Date Status	latest Projects are ongoing
Evaluation	Cooperation with the relevant institutions (SCRIPT, IFEN) has been established

6. environmental programme - update and current projects 2024 - 2027

Indirect environmental aspects

Goal	**4. Further development of national collection systems in retail to improve the collection of valuable and problematic products and reduce residual waste**
Measures	2018-2021: Participation in the development of the national waste app to present all offers for waste product collection; establishment of collection cabinets (e.g. Cactus, Auchan); further cooperation in the implementation of the national waste management plan with the aim of standardising the collection systems. from 2022: Cooperation in the implementation of the national waste management plan with the aim of further developing the collection systems in the retail sector will be pursued.
Partners	Producer systems: Ecotrel, Ecobatterien, as well as the municipalities and municipal syndicates, confédérati- on luxembourgeoise de commerce
Responsible	Management, coordination of consulting and additional activities and coordination of communication
Deadline	Re-examination by 31.12.2025 at the latest
Status	The revision of national legislation has been completed. The **SDK** continues to support the environment ministry and environmental administration in the further development of the collection systems, but is now explicitly limited to problematic products.
Evaluation	The **SDK** is now largely supportive in this area and in practice limits itself to problematic products.

Goal	**5. Further development/replacement of input-based recovery rates to an output-based instrument that represents the realistic recovery of (secondary) raw materials (resource potential)**
Measures	2018-2021: Further application; campaign at EU level, national authorities; acquisition of further partners for certification (both reverse production and production); review of resource potential for **SDK** consumables; review of resource potential for new products - including reparability from 2022: The measures from previous years will be continued. The existing certifications were updated or continued. Placement at EU level will continue to be pursued.
Partners	Product recipients, producers of goods and consumables
Responsible	Management, coordination of consulting & additional activities, coordination of
Deadline	communication Reassessment by 31 December 2025 at the latest
Status	The resource potential is part of the **SDK Circular products**. Another starting point is cooperation with the RAL 950 quality mark, but there has been no significant further development.
Evaluation	The further dissemination of the resource potential - the certification of further reverse production processes - could unfortunately not be realised as desired. Only one product - Geobloc - 2024, see direct environmental aspects (2) was certified.

Indirect environmental aspects

Goal	**6. Sensitising institutions and companies to the circular economy**
Measures	Ongoing: Information for companies and facilities as part of the **SDK** fir Betriber; reference to resource potential and other innovation projects as part of the waste management concept; active cooperation in partner projects; support for the House of Sustaina- bility offer and the Fit 4 Sustainability and SME Packages programmes as part of the Climate Pact fir Betriber initiative; planned for 2024 and implementation in 2025: specific waste prevention information
Partners	House of Sustainability, Luxinnovation and Ecoinnovation Cluster; LIST, University of Luxembourg, Climate Pact municipalities
Responsible	Directorate, coordination Consultancy and additional activities
Deadline	Reassessment by 31 December 2025 at the latest
Status	Ongoing review of requirements. Circular economy will continue to be discussed in the facilities and companies. Information is provided about the partners' projects.
Evaluation	The planned measures are being implemented. Sensitisation of businesses through ongoing information about innovation projects. It is not possible to quantify and evaluate success.

Goal	**7. Further development of the collection systems in residences to improve the collection of valuable and problematic products and reduce residual waste - equipping the connected residences with waste locks**
Measures	2018-2020: ongoing advice and support in setting up collection stations; s u p p o r t in equipping waste locks; development of a cost-effective model to increase the attractiveness of waste locks; campaign to further equip waste locks; 2021: Intensive promotion of the label; new concept for awarding the label from 2022: The measures will be pursued further. Implementation of further training courses, both for property managers and residents, with a focus on a 'train-the-trainer' concept.
Partner	Residences, property management companies, GSPL (Association of Property Management Companies), municipalities; billing service providers
Responsible	Management, coordination of counselling and additional activities, communication coordinator, project manager for residences
Deadline	Renewed audit by 31.12.2025 at the latest
Status	Due to the new legal requirements, the demand for SDK's services has developed positively. The number of labelled residences remains at 37.
Evaluation	The trend in 2024 was also positive and target-oriented. The development in 2025 must be awaited, as certain services will become subject to a charge on 1 January 2025.

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

... Measures	from 2023: general promotion of reusable containers in the gastronomy and catering sector. Support for other providers in Luxembourg. Further promotion of the ECOBOX.
Partner	Ministry, IMS, Horesca, canteens, restaurants, clc, Chambre de Commerce, Chambre des Métiers
Responsible	Management, coordination of consulting & additional activities, communication coordinator, 'Clever lessen' project team
Deadline	Re-examination by 31.12.2025 at the latest Measures are in
Status	progress.
Evaluation	Positive development: over 150,000 ECOBOXes had been distributed by 31 December 2024

Target	**9. Increase in the number of people qualified by the training department; expansion of the training programme**
Measures	2018/2019: Improvement of the department's management system; addressing national players in continuing vocational training // 2020-2021: Further diversification, expansion, implementation of the concept; increased offerings in cooperation with national training institutions; further development of the management system and the software used. 2022: Offers in cooperation with national training institutions; further development of the management system 2023: ISO 21001 certification; development of an online tool/app to reach even more people. 2024/2025: Introduction of online tools/apps Labour office, municipalities, state institutions, schools
Partner	Management, coordination SDK Academy
Responsible	Re-examination by 31.12.2025 at the latest
Deadline	Measures are underway. A new strategy paper was agreed with the Ministry of the Environment in 2022 to meet the requirements of the SDK Academy even better.
Status	The SDK Academy's programmes have been very well received. The number of participants is at a high level.
Evaluation	

Goal	**10. Conserving resources through repair and sharing economy - 'Repair & Share' project**
Measures	Ongoing: Attract more businesses, especially from the craft sector; promote businesses that offer repair services; expand the website with general information on the topic of repair; 2020-2021: Discussions with Repair Café and other stakeholders to further develop the offer; cooperation and networking with existing projects such as Social ReUse or Rethink will be pursued further. Carrying out market analyses. The reorientation of the concept resulted in the project being renamed 'Repair & Share'. The internet platform was revised as planned. The project will continue to be promoted with the Chambre des Métiers from 2023. The latter stepped up its activities in 2024 with the aim of a national repair bonus.

Indirect environmental aspects

Partners	Ministries, Chambre des Métiers, Chambre de Commerce, Oekozenter Pafendall, Ecotrel, INDR, Re- pair-Café Luxembourg, Cell
Responsible	Management, coordination of consulting and additional activities, coordination of communication, project team "Share & Repair"
Deadline	Re-examination by 31.12.2025 at the latest
Status	The conceptual revision was completed at the end of 2022. The increased application is ongoing, but the number of registered businesses has not increased significantly
Evaluation	The project is significantly influenced by framework conditions (EU and national legal framework). Positive further development can only be expected in the medium term.

Goal	**11. Green events: making events more environmentally friendly by avoiding and separating waste**
Measures	2019: Launch of the campaign in September; creation of a website; increased advice; award of the first 'Green Events' and 'Mir engagéieren eis' labels 2020/2021: Measures are maintained; increased cooperation with municipalities; further awarding of the 'Green Events' and 'Mir engagéieren eis' labels.2022: Measures are maintained. from 2022: Measures will be maintained. Increased support for events; cooperation with municipalities; collaboration on the Green Business Events project. Publication of a brochure for municipalities.
Partner	Ecocentre Pafendal, ministries, municipalities
Responsible	Directorate, coordination of consulting and additional activities, coordination of communication, project
Deadline	management Renewed review by 31 December 2025 at the latest
Status	Measures are underway. The municipalities are increasingly involved in the application and implementation - also due to the legal framework conditions.
Evaluation	The response continues to be positive, also due to the new legal framework. In 2024, 415 consultations were carried out, 149 of them by the **SDK**. The project is progressing well.

Goal	**12. Integration and sensitisation of refugees regarding the handling of waste products / resources**
Measures	Ongoing: Continuous monitoring of facilities; further improvement of collection; sensitising refugees to avoidance; from 2023, increased training courses based on the 'train-the-trainer' concept
Partner	ONA (formerly OLAI)
Responsible	Management, training coordination, project team Re-
Deadline	examination by 31 December 2025 at the latest
Status	Ongoing examination of requirements.
Evaluation	Monitoring and training measures continued as planned in 2024. Quantitative data on effective prevention (currently) not possible.

6. environmental programme - update and current projects 2024 - 2027

Indirect environmental aspects

Goal	**13. Further reduction of potential hazards from problematic products in private households**
Measures	2018-2020: Awareness-raising campaigns on railway sleepers and treated wood, on lithium batteries in cooperation with Ecobatterien, on handling medicines, aerosol cans, paints/varnishes 2021: ongoing monitoring of developments; continuation of the campaigns. Topics in 2021 were in particular fireworks/explosives and the hazard potential of high-energy (lithium) batteries. from 2022: measures will be pursued further; ongoing monitoring of developments
Partner	Municipalities, ecobatteries, health sector Directorate, coordination of consulting & additional activities, **SDK fir Bierger**
Responsible	Renewed review by 31.12.2025 at the latest
Deadline	Measures are underway. 2023 The topic was generally promoted further. Avoidance effects are noticeable. However, new products also 'emerged' or increased significantly in 2024 that did not play a role in previous years and represent new potential hazards, in this case nitrous oxide containers.
Status	
Assessment	Measures have been implemented as planned.

Goal	**14. Practical implementation of the barter economy with the aim of waste prevention in schools (see also point 3.)**
Measures	2019 and 2020: installation of barter cupboards in lycées; accompanying information (rules of use) and awareness-raising; accompanying workshops; 2021: implementation by the **SDK Academy**; accompanying information and awareness-raising; accompanying workshops; participation of the **SDK** in the 'Sustainability check in schools' project
Partner	Schools, ministries
Responsible	Directorate, SDK Academy coordination Project
Deadline	completed
Status	No further specific measures.
Evaluation	Project completed. The topic has been incorporated into general education for sustainable development.

Goal	**15. Implementation of the circular economy in the construction sector: increasing resource efficiency through better planning**
Measures	ongoing: Information and awareness-raising; cooperation with architects; collaboration on building material passport for subsequent dismantling; application of the resource potential concept; expansion of instruments for the separate collection of waste products; 2018-2021: Introduction and marketing of the LECOBOX; 2022-2025: continuation of ongoing measures; increased educational measures via IFSB
Partner	Architects, LIST, university, construction industry, Administration des Bâtiments Publics, training institute of the construction industry (IFSB), other public property developers

Indirect environmental aspects

Responsible	Management, coordination of consulting and additional activities, construction
Deadline	project team Reassessment by 31 December 2025 at the latest
Status	Planning in the medium term. In the meantime, the major public property developer SNHMB (Société Nationale des Habitations à Bon Marché) has now included the **SDK fir Betriber** label for the construction sector in its tender criteria.
Evaluation	The importance of **SDK** consulting is also continuing t o grow as a result of the new legal framework. Positive development.

Goal	**16. Further reduction of environmentally harmful contaminated sites in agriculture and viticulture**
Measures	Ongoing: Advice for agricultural and viticultural businesses with the aim of connecting to the **SDK fir Betriber**; further pursuit of needs with the help of cooperation with Maschinenring MBR and ASTA; until 2021: Management of the processing and recycling of films and other plastics as well as vineyard stakes and fruit tree stakes from agriculture
Partner	Ministry of Agriculture, MBR (machinery ring), ASTA (agricultural administration) Coordination of
Responsible	consulting & additional activities, project management agriculture
Deadline	Project completed
Status	Ongoing review of requirements with the help of partners MBR and ASTA. The **SDK** is available to provide advice if required.
Evaluation	The expertise acquired by the **SDK** in the collection of agricultural film and piles is now being utilised by third parties. The project has been completed. The response to the advice provided to agricultural businesses continues to be positive.

Goal	**17. Reduction of problematic products in private households that are still present in residual waste (new target 2019/2020; see also point 13)**
Measures	2020/2021: Increased awareness among citizens through public relations work/advertising; in particular for the products medicines and cosmetics, aerosol cans and paints/varnishes, measures will be pursued further; ongoing monitoring of developments. In 2023 and 2024, based on the results of the residual waste analysis, a focus will be placed on the products paints/varnishes, medicines, aerosol cans and new waste containing bitumen.
Partner	Municipalities, retailers, pharmacies
Responsible	Coordination of consulting & additional activities and communication, project management **SDK fir Bierger**
Deadline	Re-examination by 31.12.2025 at the latest
Status	Current volume balances as a basis for information and sensitisation campaigns
Evaluation	The 2022 residual waste analysis shows a significant decrease in problematic products in residual waste, which indicates increased problem awareness and avoidance. The amount of problematic waste per year and resident also fell in 2024. New residual waste analysis planned for 2025.

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

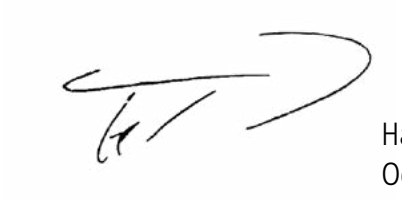
Furthermore, by signing this document, we reaffirm our commitment to comply with all legal and other binding obligations that affect us.

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

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

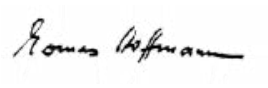
Colmar-Berg, March 2024

Signatures



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

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



Thomas Hoffmann - environmental management officer
Oeko-Service Luxembourg S.A. (operator)

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

Declaration of validity

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

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

By signing this declaration it is confirmed that:

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

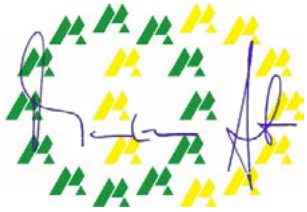
This declaration cannot be equated with EMAS registration. EMAS registration can only be carried out by a competent body in accordance with Regulation (EC) No. 1221/2009. This declaration may not be used as an independent basis for informing the public.

Berlin, 30 April 2025

Christian Ruhe Environmental verifier DE-V-0386

GUT Certifizierungsgesellschaft für Managementsysteme mbH
Environmental verifier DE-V-0213
Eichenstraße 3 b
D-12435 Berlin

Phone: +49 30 233 2021-0
Fax: +49 30 233 2021-39
E-mail: info@gut-cert.de



Markus Grob Environmental verifier DE-V-0363

Dr Georg Sulzer Environmental verifier DE-V-0041

Translation of the German original

SDK RESSOURCEN INNOVATIOUN NOHALTEGKEET CIRCULAR ECONOMY

SuperDrecksKëscht®

Glossary and list of abbreviations

ADR	European Agreement concerning the International Carriage of Dangerous Goods by Road
a	annum (lat.) = year
CO	Carbon monoxide
CO2	Carbon dioxide
DIN EN ISO 14001	Environmental management systems - requirements with guidance for use (internationally recognised standard)
ECOBOX	Reusable containers for transporting and storing food
EMAS III	Eco-Management and Audit Scheme Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a community eco-management and audit scheme, as amended in 2017 (Regulation (EU) 2017/1505) and 2018 (Regulation (EU) 2018/2026)
EMO	Environmental Management Officer
EMS	Environmental Management System
kWh	kilowatt hour
l	litre
Label ESR	Socially responsible company - Luxembourg label for socially responsible companies
LECOBOX	Mini container for separate collection of valuable and problematic products
LED	light-emitting diode
MECDD	Ministry of the Environment, Climate and Sustainable Development
NOx:	nitrogen oxides
PM	Particulate Matter
SDK	**Aktioun SuperDrecksKëscht®**
SO2	sulphur dioxide
to	ton
TOC	Total Organic Carbon
ULC	Union Luxembourgeoise des Consommateurs (Consumer Protection Association)
VOC	Volatile Organic Compounds

Ministère de l'Environnement, du Climat et de la Biodiversité
4, place de l'Europe
L-1499 Luxembourg

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

Administration de l'environnement
1, avenue du Rock'n Roll
L-4361 Esch-sur-Alzette
www.emwelt.lu

Administration de l'environnement
Grand-Duché de Luxembourg

Chambre des Métiers
2, circuit de la Foire internationale
L-1347 Luxembourg
www.cdm.lu

CHAMBRE DES MÉTIERS
LUXEMBOURG

Chambre de Commerce
7, rue Alcide de Gasperi
L-2981 Luxembourg
www.cc.lu

CHAMBER OF COMMERCE
LUXEMBOURG

SuperDrecksKëscht®
Zone Industrielle Piret
L-7737 Colmar-Berg
Tel.: 48 82 16 - 1

e-mail: info@sdk.lu

Internet: www.sdk.lu

05/2025