SDK Geliefte Klimaschutz SuperDrecksKëscht®

Aktion SuperDrecksKëscht® (SDK)*

Environmental statement 2026

for the reporting year 2025

* operator: Oeko-Service Luxembourg S.A.

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Preliminary remark on the terminology used in this environmental statement

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

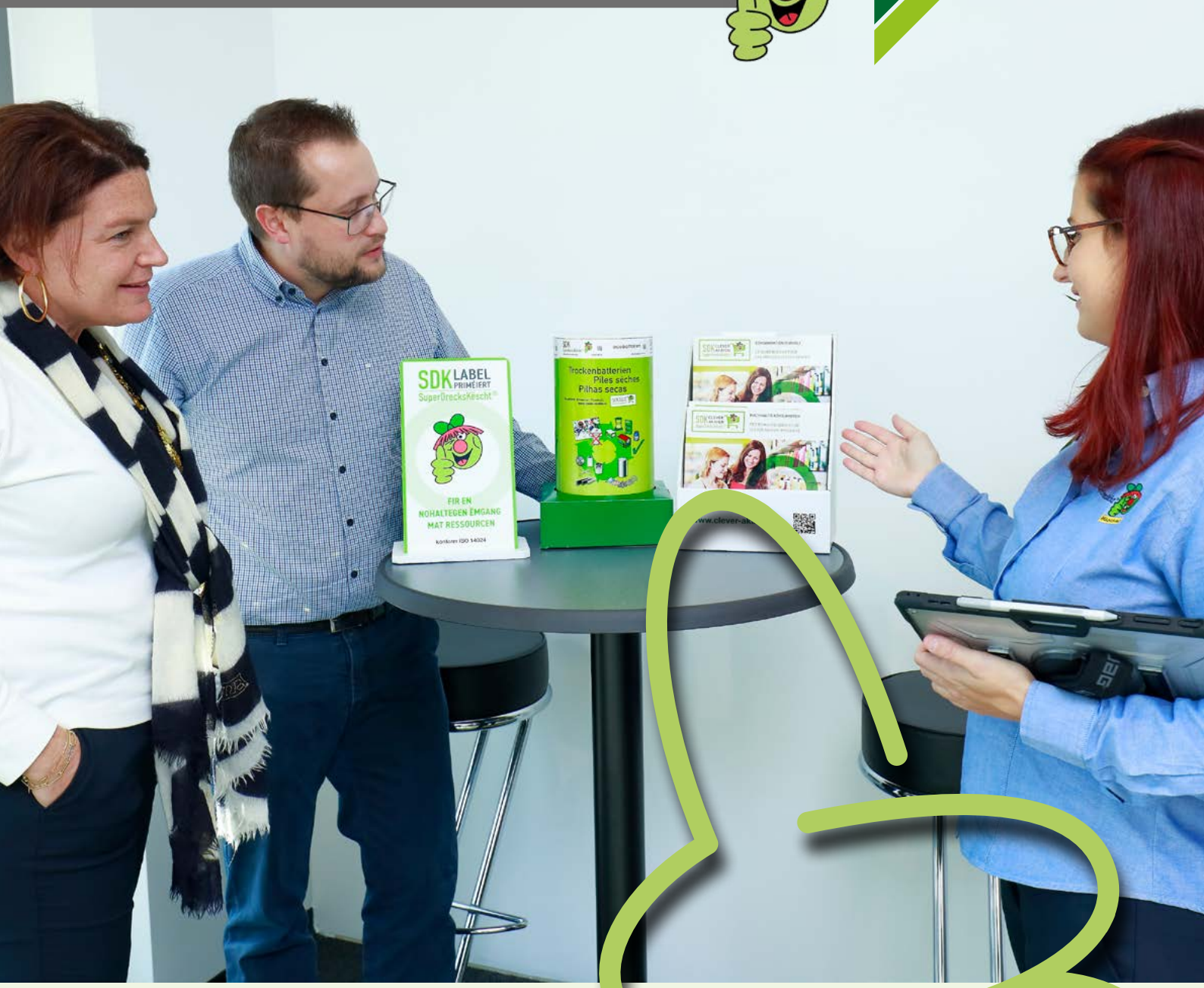
In this sense, recycling companies and waste recipients are referred to as return producers or product recipients who treat the products delivered by **SDK** using return production processes. Since the management of end-of-life products reflects consumer society, **SDK** does not refer to waste management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

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

Gender and diversity statement

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

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



1. CONTEXT AND PURPOSE

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1.1. SuperDrecksKëscht® campaign and authorised operator

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

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

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

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

SDK RESSOURCEN INNOVATIOUN NOHALTEGKEET CIRCULAR ECONOMY
SuperDrecksKëscht®

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

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

Administration de l'environnement
Grand-Duché de Luxembourg

CHAMBRE DES MÉTIERS LUXEMBOURG

CHAMBER OF COMMERCE LUXEMBOURG
POWERING BUSINESS

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

Legal basis

- Laws of 25 March 2005 and of 15 July 2022 on the financing of the **SuperDrecksKëscht® campaign**
- Act of 21 March 2012 in the amended version of 09 June 2022 on waste management
- Chargé de mission (authorised operator): Oeko-Service Luxembourg S.A.

1.2. Introduction/Foreword

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

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

All of **SDK**'s areas of activity have a positive impact on the climate. With the appointment of a climate protection officer in 2020 and the establishment of a climate council in 2021[1)], the **SuperDrecksKëscht® campaign** has given its climate protection strategy a new framework. For this reason, a climate protection report (see pages 24 and 25) has also been included in this environmental statement. The **SDK** sees its activities as climate protection in action and has therefore also incorporated this into the brand's external image.

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

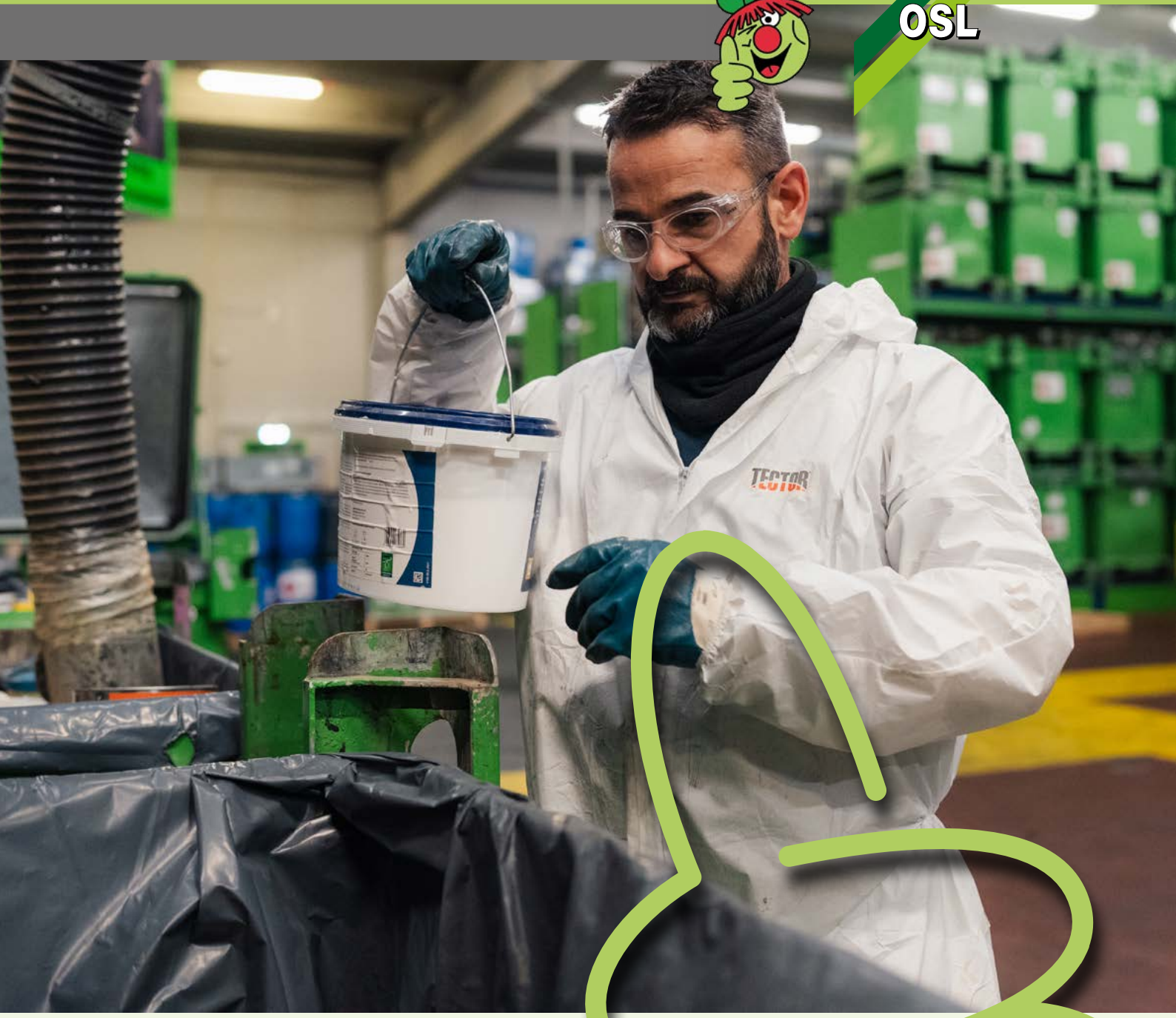
1) At the beginning of 2025, the Climate Council and the CSR/Sustainability Council were merged.

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

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

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

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



2.
PROFILE OF SDK/OSL

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2.1. Development

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

In the second phase (from 1992), the **SuperDrecksKëscht® fir Betriber** campaign introduced a waste management concept in small and medium-sized businesses, enabling ecological waste management in the sense of extensive separate collection of valuable and problematic products. During this phase, a brand identity was also established to build up the **SuperDrecksKëscht® campaign** as a consumer brand – 'away from the image of waste'.

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

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

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

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

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

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

Consulting

↓ Promotion of Shop Green products in retail stores

2.2. Activities and products

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

→ VEHICLE FLEET

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

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

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

→ LOGISTICS CENTER

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

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

↓ The Service-Center

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

→ PRODUCTS

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

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

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

2.3. Competencies

→ CONSULTING

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

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

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

↑ Sorting of medicines

↓ Application of Oeko-Pur

→ FURTHER TRAINING (SDK ACADEMY)

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

2.4. Organizational structure and location

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

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

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

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

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

↓ **The employees of SDK**

2.5. Compliance

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

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

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

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

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

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

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

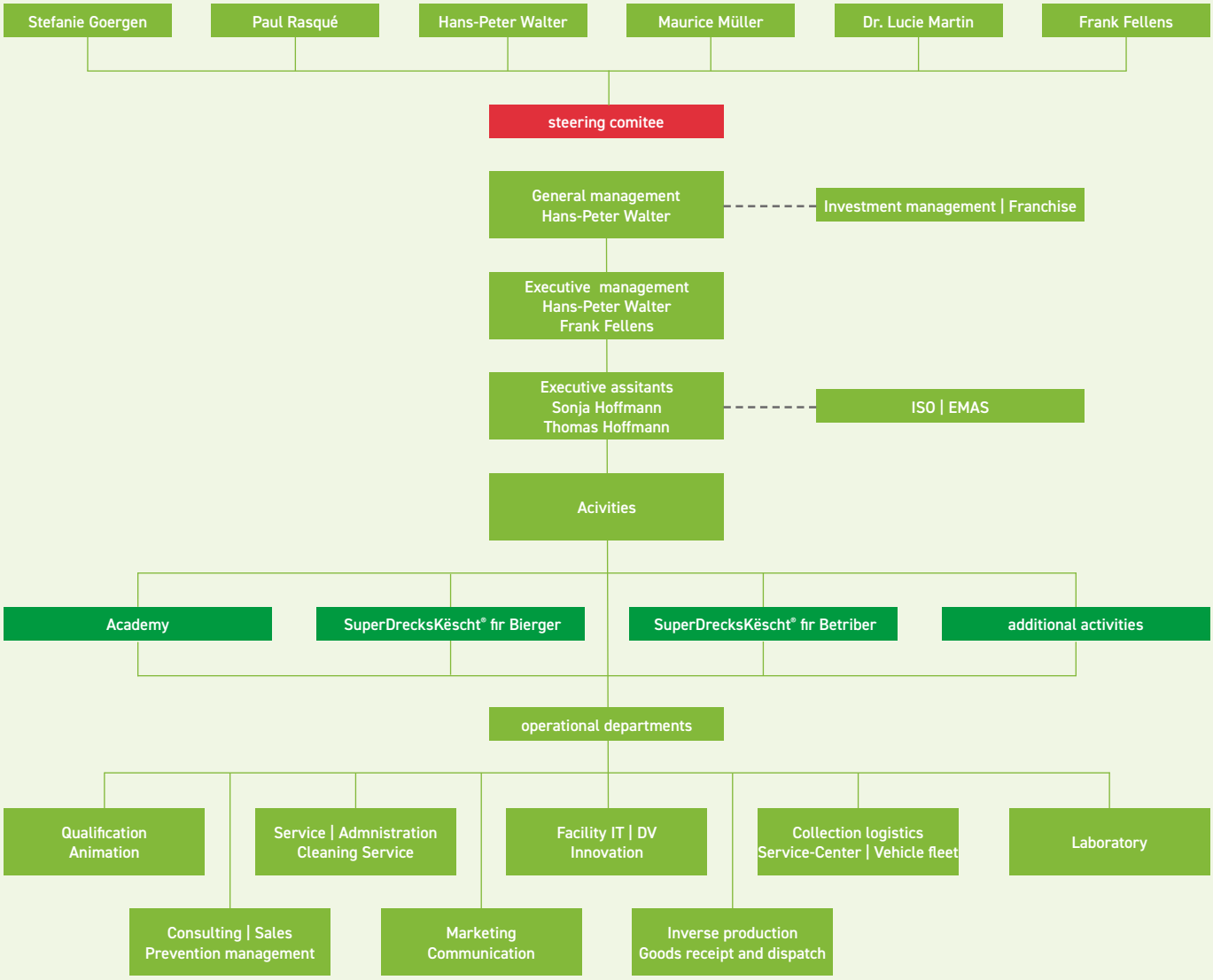
Wesentliche Gesetze für SuperDrecksKëscht
Stand: Februar 2026

N°	Kategorie	Bereich	Name	Mémoria / EUI	Jahr	Statut	Relevanz
1	Abfallgesetzgebung	Abfall	Richtlinie 2008/98/EG des Europäischen Parlaments und des Rates vom 19. November 2008 über Abfälle	EU	2008	modifiziert durch Verordnung 1357/2014 2015/1127 201/997 2018/851 2023/1542	hoch
2	Abfallgesetzgebung	Abfall	Loi du 21 mars 2012 relative à la gestion des déchets, et modifiant 1) 1. la loi du 31 mai 1999 portant institution d'un fonds pour la protection de l'environnement; 2. la loi du 25 mars 2005 relative au fonctionnement et au financement de l'action SuperDrecksKëscht; 3. la loi du 19 décembre 2008 a) relative aux piles et accumulateurs ainsi qu'aux déchets de piles et d'accumulateurs b) modifiant la loi Modifiée du 17 juin 1994 relative à la prévention et à la gestion des déchets; 4. la loi du 24 mai 2011 relative aux services dans le marché intérieur	2012A060	2012	modifiziert durch 2022A267	hoch
3	Abfallgesetzgebung	Abfall	Loi du 3 décembre 2014 modifiant 1) la loi Modifiée du 19 décembre 2008 a) relative aux piles et accumulateurs ainsi qu'aux déchets de piles et d'accumulateurs b) modifiant la loi Modifiée du 17 juin 1994 relative à la prévention et à la gestion des déchets; 2) la loi du 21 mars 2012 relative aux déchets	2014A225	2014		hoch
4	Abfallgesetzgebung	Abfall	Règlement grand-ducal du 24 mars 2015 remplaçant l'annexe V de la loi Modifiée du 21 mars 2012 relative aux déchets	2015A060	2015		hoch
5	Abfallgesetzgebung	Abfall	Règlement grand–ducal du 24 novembre 2015 modifiant l'annexe II de la loi Modifiée du 21 mars 2012 relative aux déchets.	2015A227	2015		hoch
6	Abfallgesetzgebung	Abfall	Loi du 18 décembre 2015 modifiant la loi Modifiée du 21 mars 2012 relative aux déchets	2015A256	2015		hoch

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

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

2.6. Organizational chart and company premises



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

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

3. THE ENVIRONMENTAL MANAGEMENT SYSTEM

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

3.1. Environmental management system

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

Various documents serve as a guide for all employees, primarily the training documents 'Marke **Aktion SuperDrecksKëscht®**', 'ISO 14001', 'ISO 14024' and 'ESR Label', the annual reports/sustainability reports and the **SDK** manual. They provide information about the purpose and implementation of the EMS, internal processes, responsibilities, and relevant legal regulations.

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

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

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

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

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

↓ Participation MANIFESTO 2025

As part of the implementation of the Whistleblower Protection Act of May 16, 2023, two reporting channels were set up. The reporting channels are used for the confidential reporting of complaints, objections, and claims. A member of the works council is available to employees.

The environmental management officer is available to all stakeholders from the professional environment and those involved in ISO 14024 certification. This also applies to reports relating to the protection of human rights.

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

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

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

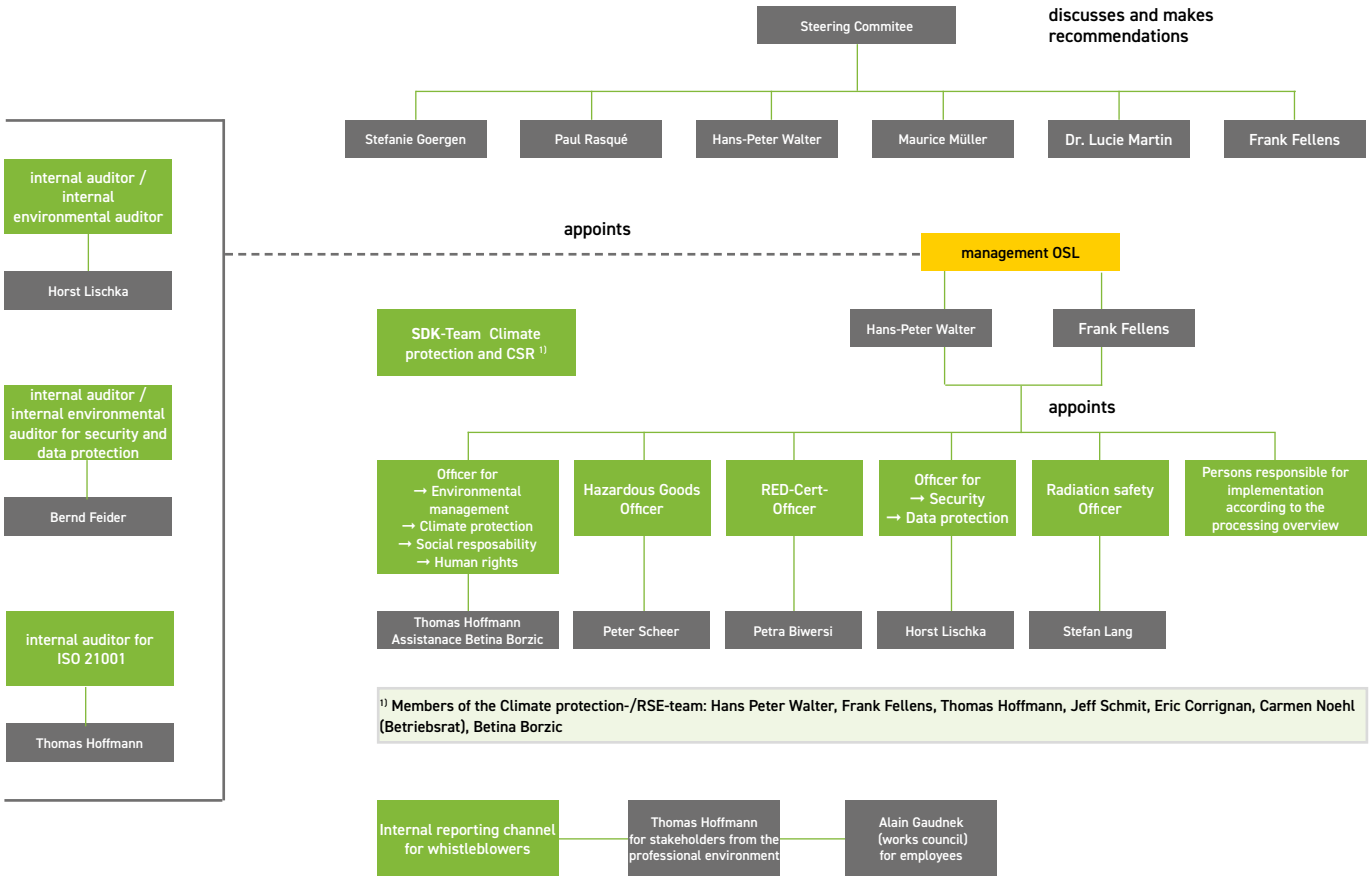
By publishing an environmental statement that is updated at regular intervals and validated by an external environmental verifier, we inform customers, business partners, and other interested parties about the company's environmental performance. The stakeholders/interested parties are listed in the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

Other relevant reports are:

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

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

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



3.2. Code of conduct and environmental code

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

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

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

↓ Code of Conduct 2025

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

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

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

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

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

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

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

Code of Conduct

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

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

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

Environmental Code

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

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

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

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

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

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

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

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

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

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

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

➪ ***Direct measures***

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

➪ ***Indirect measures***

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

June 2024

Management and environmental management officer

3.3. Corporate social responsibility[1)]

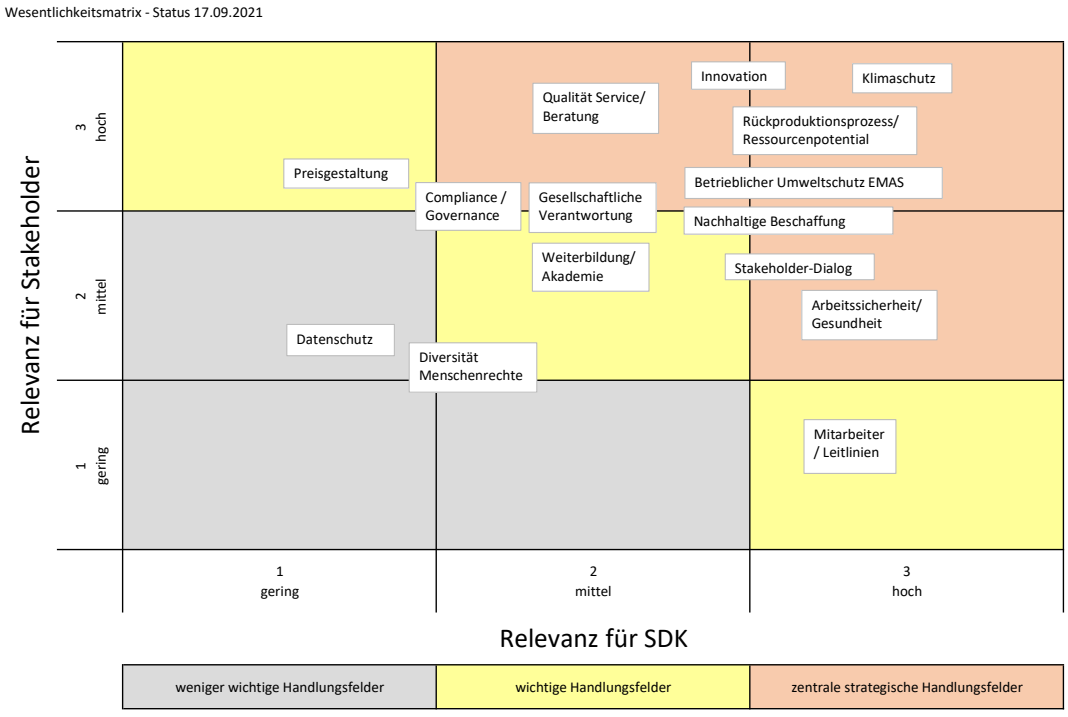
As mentioned, the environmental policy also includes essential social aspects. In this regard, the **SuperDrecksKëscht® campaign** has been participating in the national RSE label certification system since 2011 and is certified as a socially responsible company. Within this framework, **SDK** has also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

3.4. Materiality matrix

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

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

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



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

3.5. Stakeholders

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

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

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

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

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

An anonymous online employee survey is planned for 2026.

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

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

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

↑ Die mobile Sammlung des Service-Centers

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

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

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

4. ENVIRONMENTAL ASPECTS

4. ENVIRONMENTAL ASPECTS AND THEIR IMPACT

4.1. Direct and indirect environmental aspects

The **SuperDrecksKëscht® campaign** impacts the environment, on the one hand, through the handling and processing of waste products at the Colmar-Berg logistics centre, and on the other hand, through its advisory activities and administrative work. Although the environmental impact of consultancy work is relatively low compared to that of industrial and commercial operations, the organisation's fundamental commitment to the environment means that the objective is to minimise any environmental impact as far as possible.

Direct environmental aspects arise from the immediate activities at the Colmar-Berg site. These also include transport-related emissions from the collection and onward transport of waste products.

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

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

Section	Environmental aspect	Direct/Indirect	Activity	Environmental impacts (risks)
Material efficiency, including energy (resource/raw material use)	Paper consumption	d	Office work and consulting	Resource consumption
	Wastewater	d	Waste management at the logistics center, office, and consulting operations	Resource consumption
	Waste	d	Heating of the logistics center and administrative buildings	Resource consumption
	Emissions	d	Waste management; consulting services	Resource consumption
	Biodiversity	d	Cleaning of containers, irrigation, sanitation	Resource consumption
Wastewater	Wastewater discharge	d	Cleaning of containers, sanitation	Release of environmentally harmful substances
Waste	Waste generation	d	Office and administrative activities, warehouse management, laboratory	Resource consumption
Emissions	Emissions of pollutants from vehicles, machinery, and heating systems	d	Waste management; consulting services, heating of logistics center and administrative buildings	Emissions of environmentally harmful gases
	Product range (Shop Green)	d	Waste management; consulting services, heating of logistics center and administrative buildings	Emissions of climate-relevant gases
	Other projects	d	Electricity for logistics center and administrative buildings	Emissions of climate-relevant gases
	Pollutant emissions from logistics center / 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 center and administrative building	Land use
	Landscaping	d	Landscaping	Native flora and fauna
Transport	Noise from vehicle traffic	d	In-house transport; suppliers; carriers	Noise
Procurement	Procurement of goods for office and consulting	i	Office work, consulting services, public relations	Resource consumption; environmental aspects of the product manufacturing process
	Procurement of operating supplies	i	Logistics center—containers and infrastructure	Resource consumption; environmental aspects of the product manufacturing process
Product processing	Selection of transportation service providers	i	Transport of waste products; transport of operating materials	Environmental aspects of transport
	Selection of partners and product recipients	i	Handling and recycling of waste products	Environmental aspects of transportation; Environmental aspects of the recycling process
Product range (Shop Green)	Sustainable consumption among partners and consumers	i	Selection of eco-friendly products for promotion in retail	Resource consumption; environmental aspects of the product manufacturing process
Other projects	Sustainable consumption among partners and consumers	i	Support for sustainable products	Resource consumption; environmental aspects of product use

↑ **Key environmental aspects of the SuperDrecksKescht® campaign**
Status/last updated: February 2024

PRESENTATION OF DIRECT AND INDIRECT ENVIRONMENTAL ASPECTS AND THEIR ASSESSMENT

Susceptibility	1 not very significant	2 significant	3 very significant
3 high	→ Waste generation	→ Paper consumption	→ Fuel consumption for vehicles → Pollutants and greenhouse gas emissions (veh.)
2 medium	→ Pollutants and greenhouse gas emissions from electricity consumption → Noise from vehicle movements → Other noise emissions	→ Electricity consumption → Drinking water consumption → Wastewater discharge → Pollutants and greenhouse gas emissions from heating system → Handling of hazard. substances	
1 low	→ Pollutants and greenhouse gas emissions Logistics centre / Hall 1	→ Landuse → Landscaping of green spaces	→ Fuel consumption for heating

significance

no action required	monitor environmental aspectsn	monitor and take action

Status/last updated February 2024

Assessment of direct environmental aspects

Susceptibility	1 not very significant	2 significant	3 very significant
3 high	→ Procurement of goods for office and consultancy		→ Sustainable consumption by partners and consumers
2 medium		→ Procurement of operating supplies → Selection of transport service providers → Selection of cooperation partners and product recipients	
1 low			

significance

no action required	monitor environmental aspectsn	monitor and take action

Status/last updated February 2024

Assessment of indirect environmental aspects

5. ENVIRONMENTAL PERFORMANCE

5. ENVIRONMENTAL PERFORMANCE

5.1. Direct environmental aspects

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

→ INPUT

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

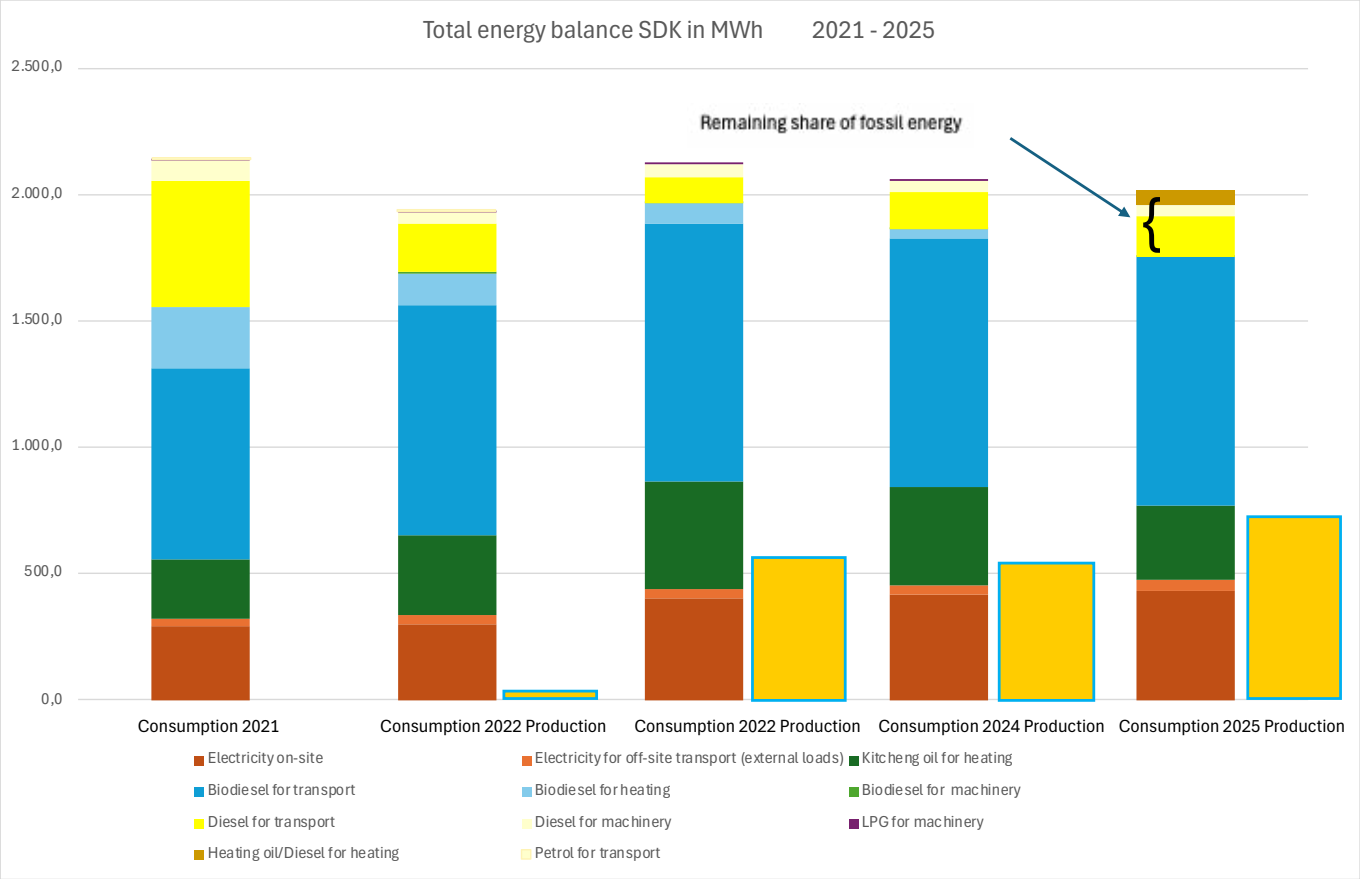
The site area remains unchanged at 17,940 m² of paved area and 3,900 m² of green space – a total of 21,840 m² of operational area.

1) Purchased volumes

2) Conversion factors and sources: see Appendix

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

→ INPUT - ENERGY BALANCE 2021-2025



NOTES ON THE ENERGY BALANCE:

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

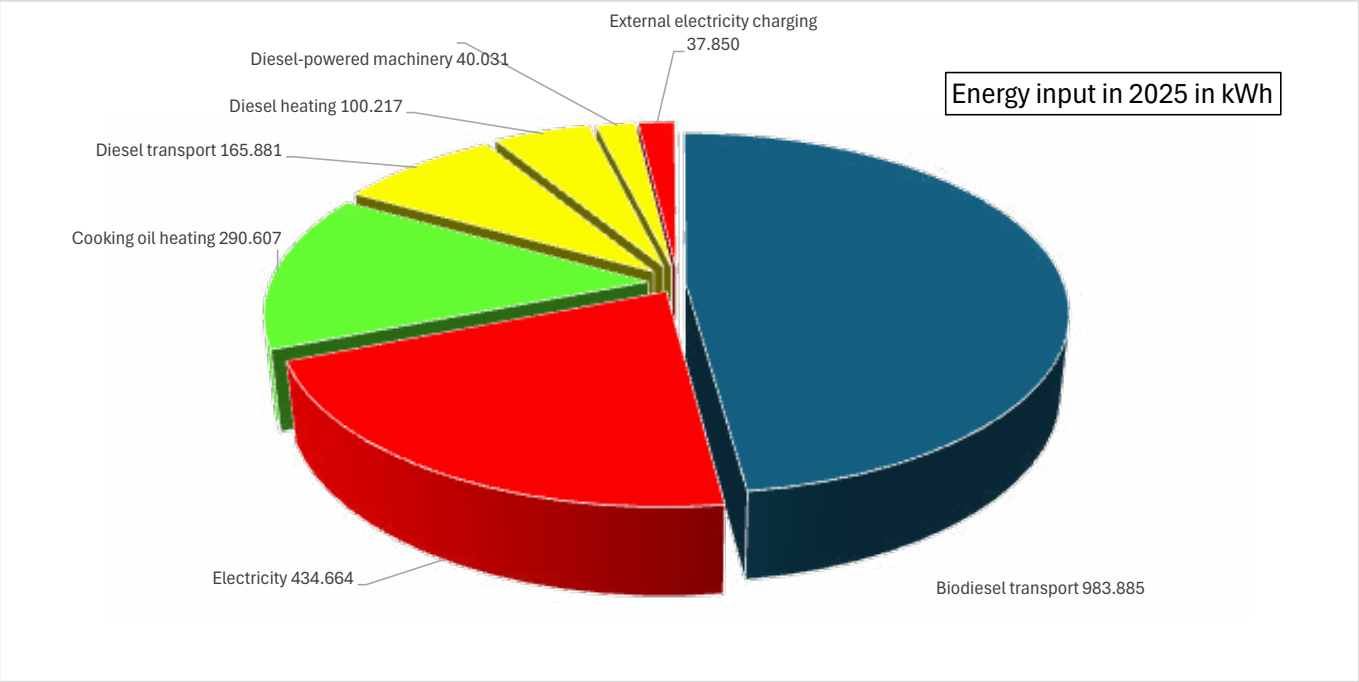
In 2025, 72.87% of the energy used by the vehicle fleet was supplied by biodiesel, which was purchased from partners who transesterify the collected cooking fats and oils into biodiesel. This means that our own activities have substituted fossil diesel, thereby significantly reducing CO_2 emissions (see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

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

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

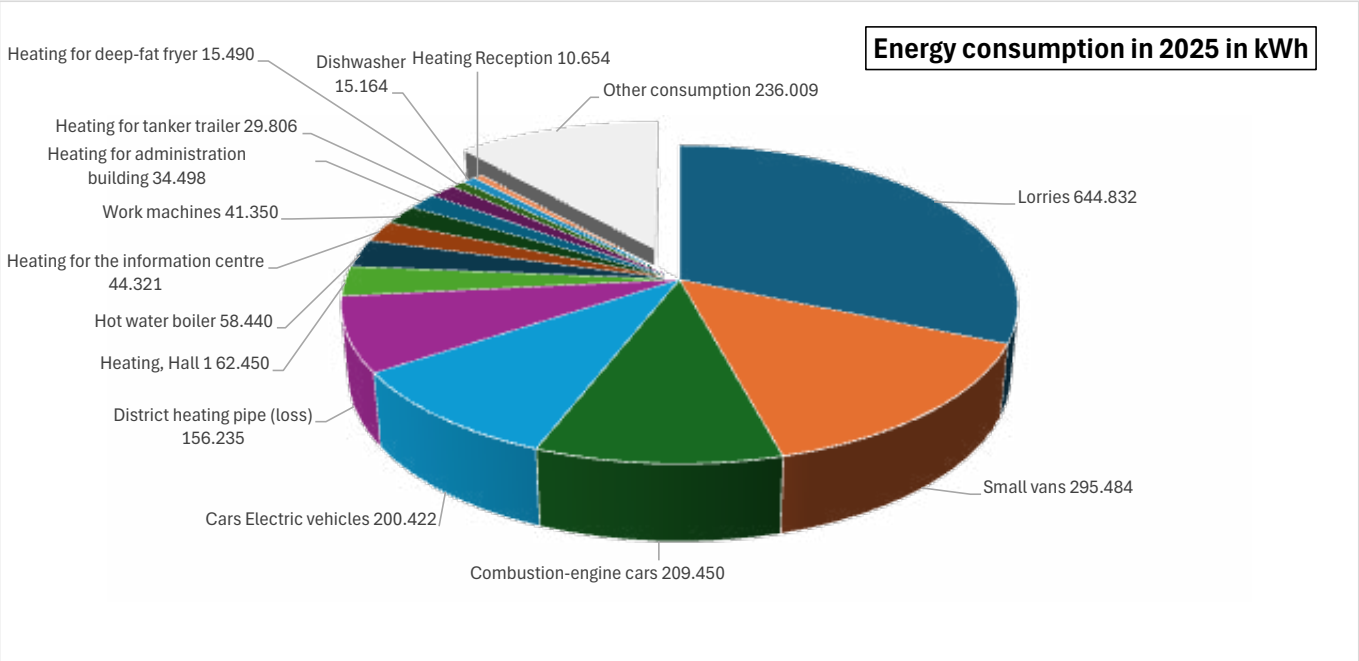
→ INPUT - ENERGY BALANCE FOR 2025 BY ENERGY SOURCE 2

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



→ OUTPUT - ENERGY BALANCE FOR 2025 BY MAJOR ENERGY CONSUMERS

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



→ OUTPUT

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

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

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

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

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

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

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

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

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

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

8) Collected for the first time from 2022

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

For conversion factors and sources, see the appendix

→ ENERGY: ELECTRICITY

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

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

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

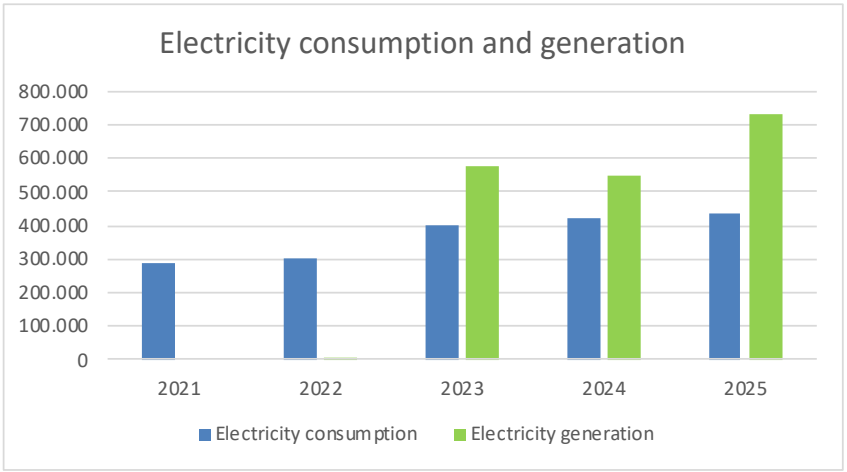
GREEN ELECTRICITY

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

ELECTRICITY GENERATION

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

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



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

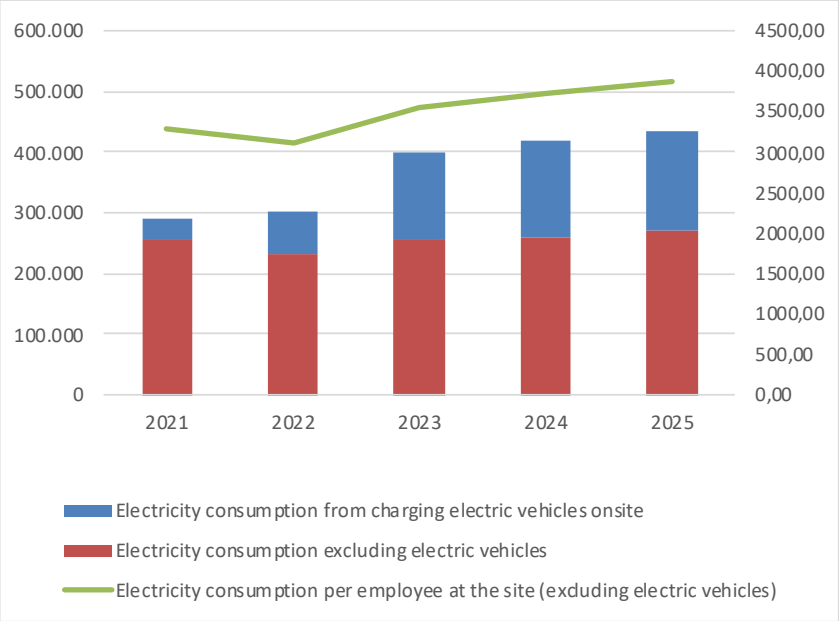
IMPACT

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

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

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

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



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

→ ENERGY: HEATING - HEAT

HEATING

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

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

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

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

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

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

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

IMPACT

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

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

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

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

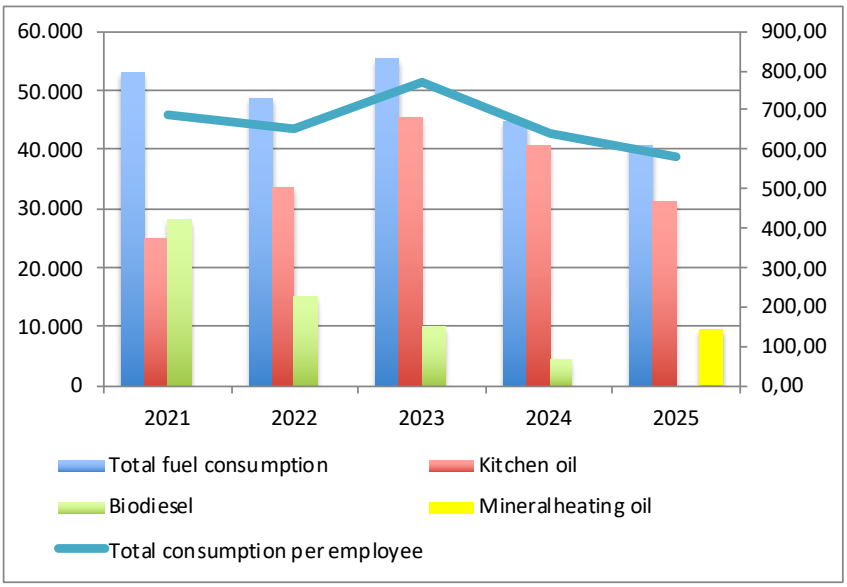
	2021	2022	2023	2024	2025
Number of employees, adjusted	77,24	74,36	71,96	70,14	70,04

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

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

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

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



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

→ ENERGY: MOBILITY AND LOGISTICS

VEHICLES

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

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

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

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

FUELS / ENERGY

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

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

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

↑ Use of biodiesel

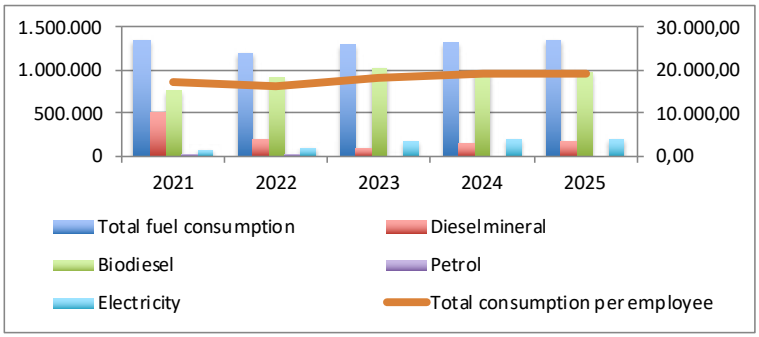
↓ Filling station

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

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

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

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



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

→ EMISSIONS

WORKPLACE AIR

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

EXHAUST AIR

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

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

HEATING SYSTEM

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

TRANSPORT

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

IMPACT

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

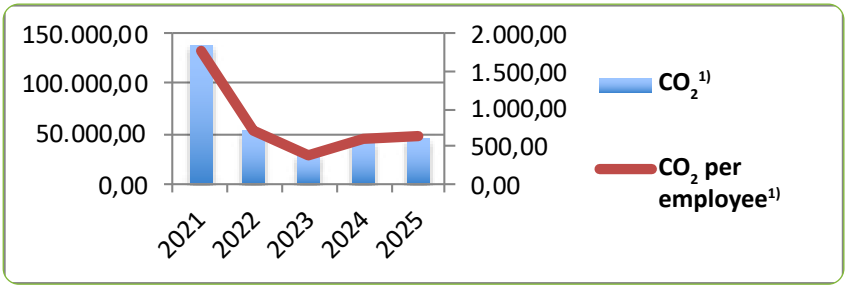
Details regarding CO_2 and CO_2-equivalent emissions can be found in the following extract from the Climate Protection Report. Scope 1 and 2 data for 2025. As the Scope 3 calculations for 2025 are not yet available, this environmental statement includes the Scope 3 figures from 2024.

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

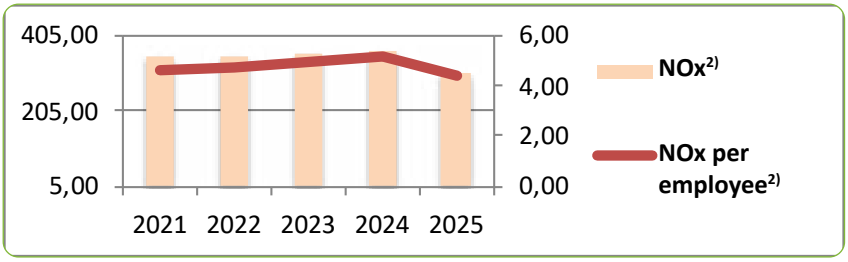
↑ Sorting and decanting station with a filtration system and continuous emissions monitoring

↓ Wash area with oil and grease separator

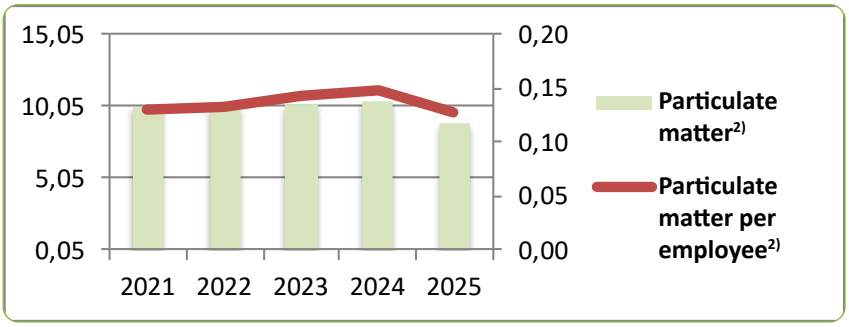
	2021	2022	2023	2024	2025	
Number of employees, adjusted	77,24	74,36	71,96	70,14	70,04	
	2021	2022	2023	2024	2025	
CO_2 [1]	137.793,68	52.544,24	27.879,75	41.097,99	45.217,73	in kg
NOx [2]	352,41	347,66	355,07	365,07	307,45	in kg
Particulate matter [2]	9,97	9,92	10,24	10,32	8,86	in kg
	2021	2022	2023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



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



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



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

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

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

CARBON FOOTPRINT ACCORDING TO THE GHG PROTOCOL

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

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

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

SCOPE 1 – DIRECT EMISSIONS (2025)

Direct emissions in 2025 amounted to:

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

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

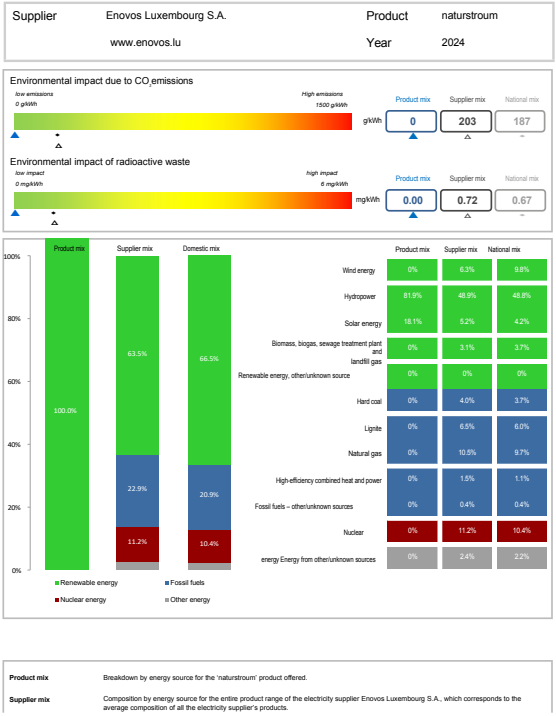
SCOPE 2 – INDIRECT EMISSIONS (2025)

Direct emissions amounted to:

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

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

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



SCOPE 3 – INDIRECT EMISSIONS (2024)

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

SCOPE 3A – INDIRECT EMISSIONS FROM UPSTREAM ACTIVITIES

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

SCOPE 3B – INDIRECT EMISSIONS BY LOCATION

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

SCOPE 3C – INDIRECT EMISSIONS FROM DOWNSTREAM ACTIVITIES

Only category 9 is relevant here.

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

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

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

→ WATER / WASTEWATER

SERVICE WATER

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

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

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

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

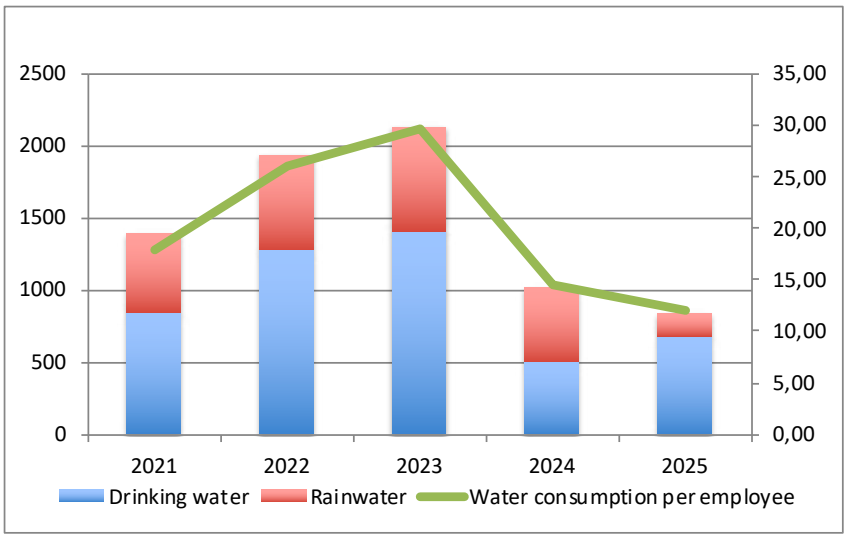
↑ Rainwater supply
Rainwater savings are recorded via a separate water meter.

↓ Water consumption 2021–2025

Number of employees
(full-time equivalents)

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

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



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

DRINKING WATER

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

WASTEWATER

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

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

IMPACT

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

↓ Drinking water for personal consumption

→ BIODIVERSITY AND LAND USE

GREEN SPACES

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

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

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

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

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

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

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

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

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

↑ Nature Pact for Businesses Pledge

↓ Ffruit trees on the premises

LAND USE

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

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

↑ The area in front of the administration building

PESTICIDES

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

IMPACTS

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

↓ Large insect hotel and flower meadow

→ WASTE PRODUCTS

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

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

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

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

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

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

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

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

IMPACT

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

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

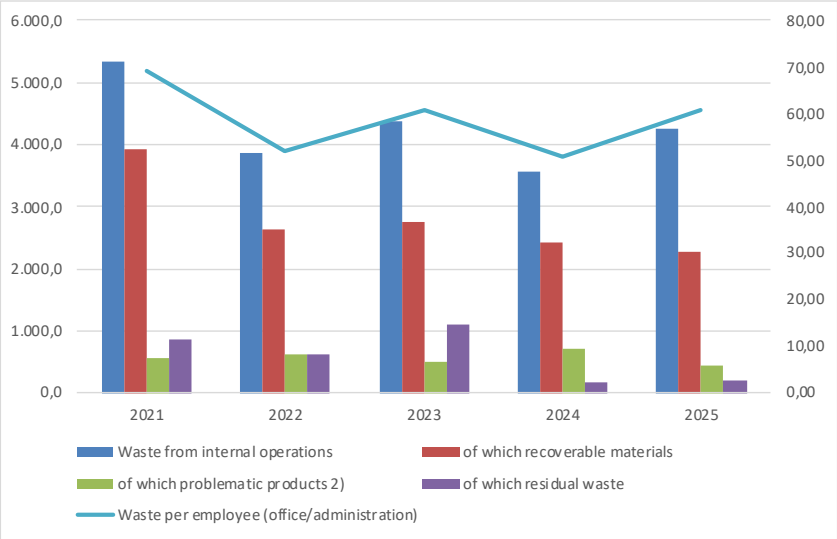
↓ **Waste generation 2021–2025**
Number of employees (full-time equivalents)

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

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

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

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

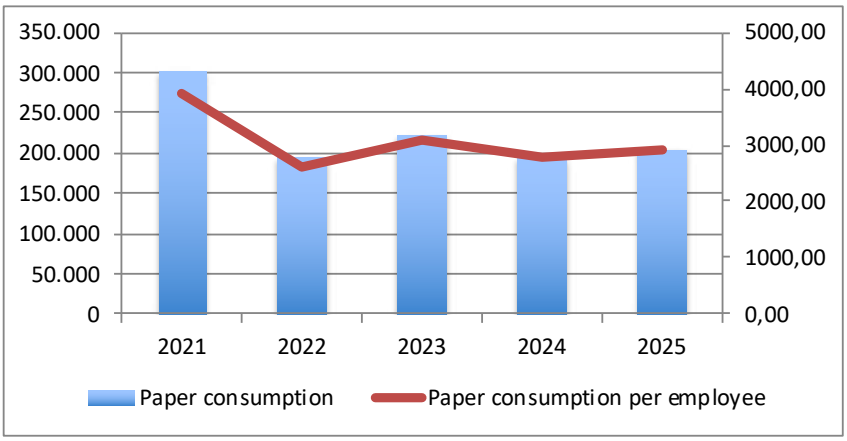


← **Waste generation 2021–2025**
Left scale/bars in absolute kg
Right scale/line in kg per employee

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

→ PAPER CONSUMPTION

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



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

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

→ HAZARDOUS SUBSTANCES

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

The logistics centre for the temporary storage and processing of the collected products is equipped in accordance with legal requirements. This includes precautionary measures relating to occupational health and safety and fire protection. It also encompasses appropriate training for staff.

→ NOISE

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

→ TRAFFIC VOLUME

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

→ IMPACTS

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

↓ Pressurised gas cylinders at the logistics centre

CONTINGENCY PLANNING FOR OPERATIONAL DISRUPTIONS

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

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

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

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

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

EVACUATION AND FIRE SAFETY DRILLS

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

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

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

ENVIRONMENTAL PERFORMANCE INDICATORS – SUMMARY OF KEY INDICATORS

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

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

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

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

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

5.2. Indirect environmental aspects

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

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

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

For cooperation partners and product recipients, the criteria for cooperation are set out in contracts. Cooperation partners and product recipients are assessed according to criteria that include indirect environmental impacts.

Since the end of 2015, the ISO 14024-certified Resource Potential Certification tool has been applied to product recipients. This primarily evaluates the output streams from recycling with a view to achieving the highest possible proportion of generated secondary raw materials. The Resource Potential Assessment generates key performance indicators that enable the 'resource performance' of product recipients to be evaluated, thereby allowing the option with the best performance to be selected when faced with alternative choices.

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

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

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

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

→ PACKAGING / OPERATING MATERIALS

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

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

→ SUPPLIERS AND SERVICE PROVIDERS

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

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

→ PRODUCT RECIPIENTS

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

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

→ CARRIERS

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

→ INFORMATION FOR EMPLOYEES AND CUSTOMERS

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

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

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

6. MANAGEMENT-KEY PERFORMANCE INDICATORS

6. MANAGEMENT- KEY PERFORMANCE INDICATORS

The annual report/sustainability report, published each year, contains further information on the activities of the **SuperDrecksKëscht® campaign**, It includes a range of management performance indicators relating to indirect environmental performance. These include, amongst others:

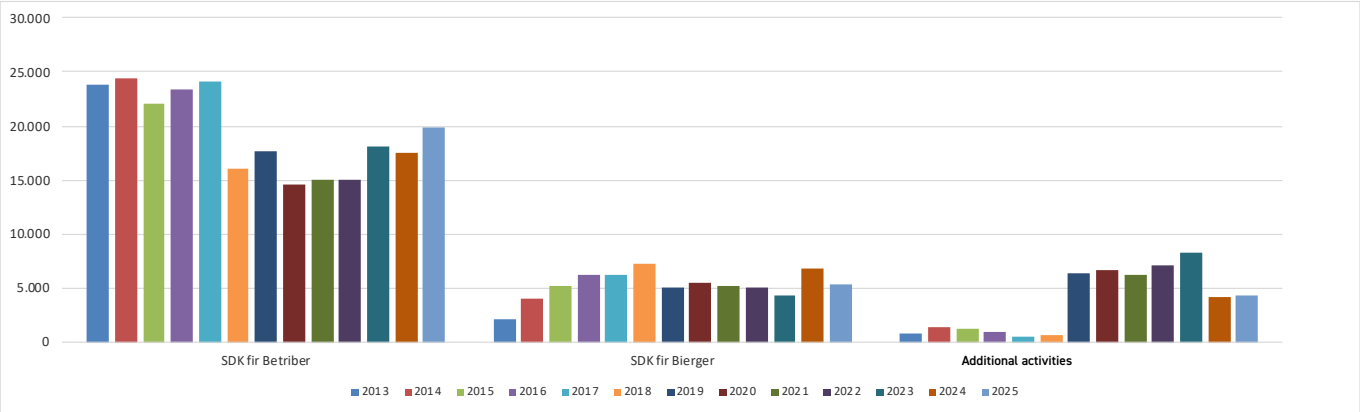
- Volumes of problematic products collected from private households
- Number of advisory services provided to citizens and businesses/institutions via telephone and email
- Number of businesses/institutions advised and audited in relation to waste management
- Number of cooperation partners and product recipients audited for legal compliance and environmental performance
- Number of internal and external training sessions, topics and number of participants
- Number of visitors guided through the logistics centre
- Number of information stands/exhibitions, etc., aimed at informing the public and the business community

as well as further management performance indicators relating to **SDK**'s innovation projects, such as the number of participants in the **ECOBOX** project and the number of **ECOBOX**es in circulation for the reduction of food waste. Furthermore, environmental status indicators are also included here. 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 made available to all interested parties on request during the first half of the following year. In addition to the German-language version, French and English versions are also available on the website www.sdk.lu. The Annual Report/Sustainability Report is based on the guidelines of the GRI (Global Reporting Initiative).

→ ADVICE FOR RESIDENTS AND BUSINESSES/INSTITUTIONS

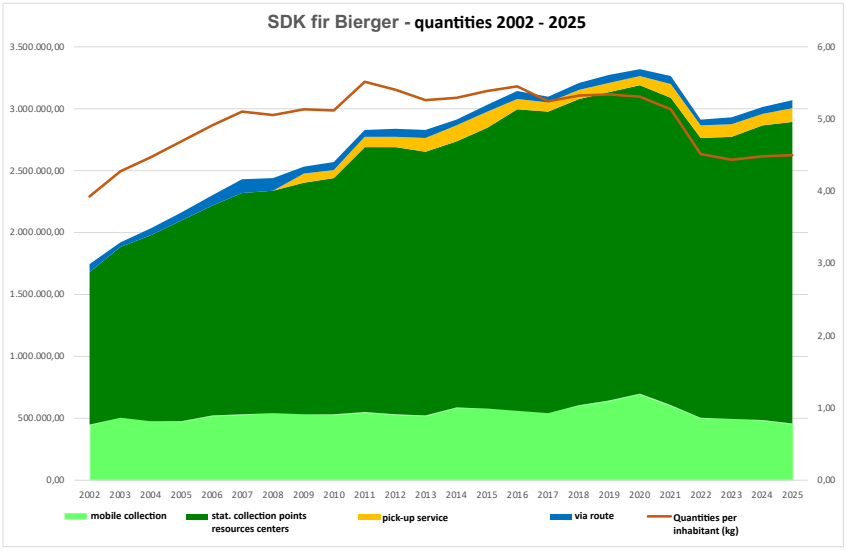
The number of contacts via email or telephone in 2025 remained at the same level as in the previous year. Of 29,670 customer communications, 19,894 concerned the **SDK fir Betriber**, 5,414 the **SDK fir Bierger** and 4,362 additional activities.

↓ **Consultancy activities 2013–2025 (Contacts)**



→ VOLUMES OF PROBLEM PRODUCTS COLLECTED FROM RESIDENTS

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



← Problematic products collected from private households 2002–2025
right-hand scale / bars: quantity in kg
right-hand scale / line: quantity per inhabitant per year

→ WASTE PRODUCTS PROCESSED AT THE LOGISTICS CENTRE

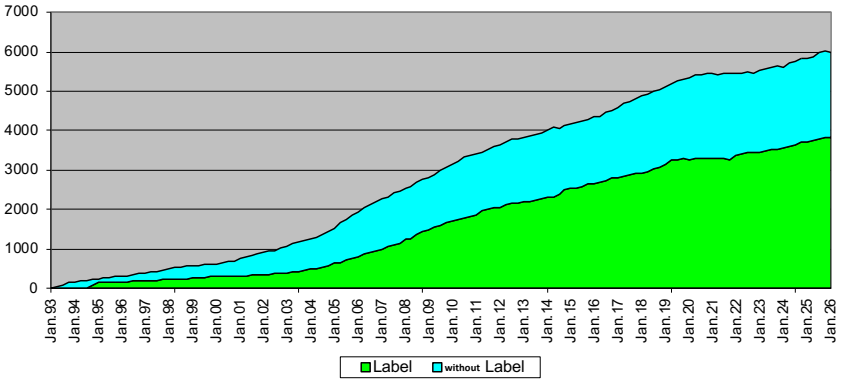
In 2025, 4,588.0 tonnes of valuable and problem products were received at the logistics centre. In 2023, the figure was 4,555.9 tonnes. The volume has therefore risen slightly, by 0.7%. In 2025, 4,552.3 tonnes were transported from the logistics centre to the product recipients. In 2024, the figure was 4,571.5 tonnes, which is 0.4% less than in the previous year.

→ QUALITY ASSURANCE BY THE SDK LABORATORY

The number of samples for 'products' and 'unknown products' in 2025, totalling 2,061 samples, remained at the level of previous years. Analyses of indoor air/radioactivity and special batches, at 6,636, were significantly below the previous year's figure. Both tasks are non-cyclical. Details in the annual report.

→ CONCEPTS FOR BUSINESSES/FACILITIES

As of 31 December 2025, 5,970 facilities were registered. Among other things, 2,305 analyses and concepts were produced and 2,546 label audits were carried out. A total of 7,451 visits were made to facilities. These included 299 initial consultations and 32 training sessions. The number of labelled facilities stood at 3,834 on 31 December 2025, representing a share of 64.2% (previous year: 63.6%). The number of employees at the affiliated facilities stood at 313,178 on 31 December 2025.



← SuperDrecksKëscht for Betriber 1993–2025
Status as at 31 December 2025
5,970 businesses registered
3,834 businesses awarded the label

→ AUDITS AT PARTNERS AND PRODUCT RECIPIENTS

During 2025, 58 meetings took place with product recipients and cooperation partners. The Resource Potential tool was also applied during these meetings (see point 2 – Consultancy/Sales). In addition, there were 35 meetings with product recipients or cooperation partners at the Colmar-Berg site, including online conferences. The calculation of resource potential according to the **SDK** concept was updated for most product streams.

In 2025, of the 20 cooperation partners who had signed the convention updated in 2022, 9 had been awarded the **SDK** quality label, all with a diploma (having held the label for 5 years or more).

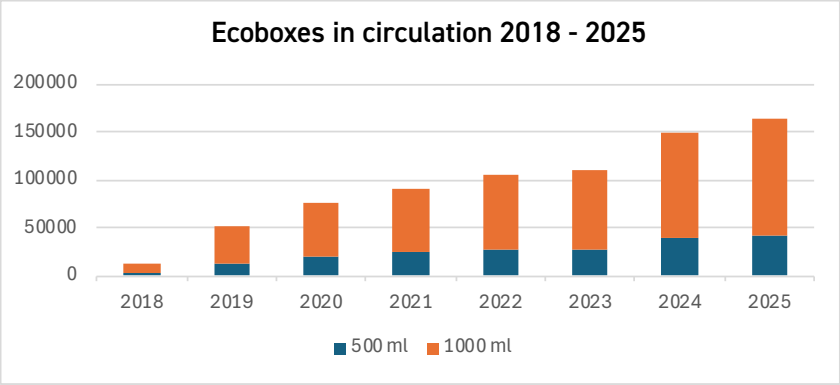
→ SDK FIR BIERGER AND ADDITIONAL ACTIVITIES

SHOP GREEN

The 'Clever akafen' (Clever Shopping) 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 retail outlets with the slogan **'Shop Green'**. The number of participating shops stood at 155 on 31 December 2025.

CLEVER IESSEN

The campaign to promote reusable containers, which allow food to be taken away from restaurants, canteens, takeaways, etc., was launched in June 2018 and continued to develop positively in 2024. As of 31 December 2025, 137 restaurants and 163 canteens/school canteens were participating. 41,674 containers of 500 ml and 122,733 containers of 1,000 ml – totalling over 160,000 units – had been distributed by that date.



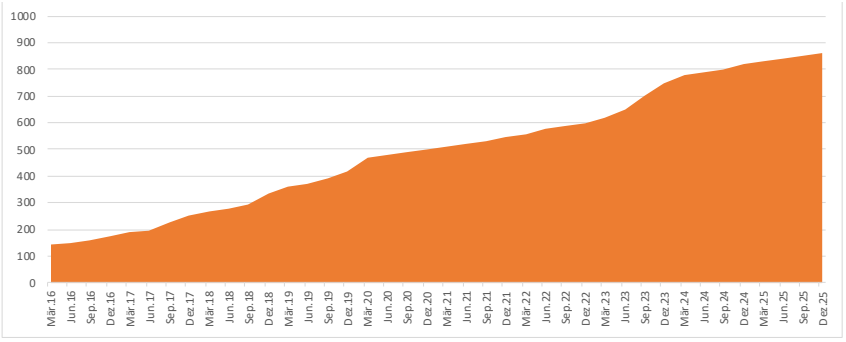
← quantity of distributed Ecoboxes 2018 - 2025

RESOURCE POTENTIAL

The concept enables the recycling and disposal processes (reproduction processes) at the waste recipient (product recipient) to be examined and evaluated in terms of resource efficiency. As of 31 December 2025, a total of 133 remanufacturing processes had been certified across 47 partners of the **SuperDrecksKëscht® campaign** and other stakeholders.

ECOLOGICAL WASTE MANAGEMENT IN RESIDENTIAL PROPERTIES

As of 31 December 2025, a total of 100 property management companies were active, covering 6,300 residential properties. Of these, 858 residential properties had been set up. The number of label-awarded residential properties remained at 37 in 2025.



← Number of residential properties with recycling facilities

REPAIR & SHARE

The overarching aim of the online platform is to extend the lifespan of goods in the interests of resource efficiency and to reduce resource consumption through shared use. 'Flécken a Léinen' was renamed 'Repair & Share' in 2022. As of 31 December 2025, 123 businesses offering repairs and 33 businesses offering a hire service were registered.

SDK ACADEMY

The **SDK** Academy is a cross-cutting tool designed to raise awareness, provide information and offer training within the framework of the **SuperDrecksKëscht® campaign** (**SDK fir Bierger**, **SDK fir Betriber** and additional activities) initiative.

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

In the context of further training, the **SDK** Academy relies on collaboration with sector-specific partners. In 2025, further training took place in collaboration with partners such as the Chamber of Crafts, House of Training, IFSB, INAP, IFEN, Horesca and CNFPC. Furthermore, specific training courses were held for staff at the Resource Centres and for cooperation partners of the **SuperDrecksKëscht® campaign**. A total of 236 training modules took place, involving 2,848 participants.

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

→ - external provision: 785 activities with 12,534 participants

→ - internal training: 179 modules with 324 person-days.

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

Further details regarding these activities can be found in the separate SDK Academy 2025 Annual Report.

7. ENVIRONMENTAL PROGRAMME

7. ENVIRONMENTAL PROGRAMME

UPDATE AND CURRENT PROJECTS 2025–2028

The updated environmental programme of the **SuperDrecksKëscht® campaign** is set out below. In line with the remit under the national sustainability strategy, the objectives here primarily concern indirect environmental aspects.

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

7.1. Direct environmental aspects

Objective	1. Climate neutrality or a positive carbon footprint by 2025
Actions	Further development of the carbon footprint assessment and climate protection report to include Scope 3. Preparation of a comprehensive carbon footprint assessment including Scope 3 since 2022.
Responsible	Management, **SDK** Climate Council
Deadline	Ongoing; target remains to reduce the CO2 footprint by 31 December of the current year
Status	Publication of 3 climate protection reports for 2019–2021 with ongoing addition of Scope 3 data. Complete climate protection report including Scope 3 since 2022.
Assessment	Positive development. The commissioning of the PV system in 2022 and the extensive conversion of the car fleet to electric vehicles have significantly reduced the CO2 footprint. The expansion of the PV system, with commissioning in autumn 2025, has further increased electricity production. The treatment of collected waste products also plays a key role. The recycling and reprocessing processes, which are certified according to the ISO 14024 resource potential standard, save significant CO2 emissions compared to conventional recovery and treatment methods.

Objective	2. Circular economy: Closing regional material cycles through collaboration with local producers
Actions	Promotion of **SDK** Circular products; the goal of introducing further **SDK** Circular products remains in place.
Responsible	Management, coordination of additional activities
Deadline	Ongoing; target remains: further **SDK** Circular product by 31 December 2027
Status	**SDK** Circular label; ensuring legal compliance with authorities; management of existing **SDK** Circular products; with Ecobloc, a further product was launched in 2023. Further assessment of which waste products are suitable.
Assessment	**SDK** Circular is not the only tool supporting the circular economy. **SDK** generally supports all stakeholders who are particularly committed to promoting the circular economy.

Objective	3. Optimisation of waste disposal logistics to reduce energy consumption
Actions	No specific new measures. Monitoring of the current situation.
Responsible	Management, Coordination of Collection Logistics
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	The optimisation of route planning using GPS monitoring has been implemented via the 'Webfleet' system.
Assessment	The objective of optimising logistics has largely been achieved through the purchase of new low-emission vehicles (see below), high utilisation rates and the Webfleet system. The number of kilometres driven in the logistics sector remains at a consistent level and can hardly be reduced further.

Objective	4. Electricity generation
Actions	A solar panel system has been installed. Commissioning (grid connection) on 30 November 2022. Expansion of the system through the installation of new modules in 2024. Installation of the necessary transformer on 20 September 2025. Commissioning (grid connection) of the second phase on 22 September 2025. Total peak output now 1,177 kWpeak.
Responsible	Management, Innovation Coordination
Deadline	N/A
Status	In 2025, 294,805 MWh more electricity was produced than consumed. The CO2 savings achieved through the use of green electricity and the production of renewable energy amount to a total of 175.9 tonnes of CO2 equivalents compared to the national electricity mix.
Assessment	Target successfully achieved.

Objective	5. Reduction of vehicle emissions (CO2, nitrogen oxides, particulate matter) by 20% by 2023 compared to 2014
Actions	2020/2021: Increased use of public transport; purchase of new vehicles and replacement of existing ones. Mileage was reduced through increased working from home (partly due to COVID, but partly also due to improved work organisation, which was already launched at the end of 2019).
Responsible	Continuation of measures 2022–2025: Further increased use of public transport; further replacement of fossil-fuel-powered vehicles with electric drives or climate-neutral fuels.
Deadline	Management, Environmental Management Officer, Innovation Coordination, Consultancy Coordination
Status	Ongoing annual review as part of the climate protection assessment
Assessment	As part of the climate protection strategy, all employees with two or more years' service were offered a company electric vehicle in 2022. Thanks to the expansion of the charging infrastructure, the electricity generated by the PV system can be used directly to power the vehicles. In total, there were 56 electric vehicles in the fleet by the end of 2024.

Objective	6. Reduction in paper consumption through digitalisation by 40% per employee by 2027 compared to 2014; new target date 2027
Actions	Completed in 2020, including: expansion of the customer portal's functions; introduction of a digital document management system for advisory services; use of e-papers in media. Measures since 2022: Continuation of digitisation measures, digital holiday requests and management; the expansion of the ELO tool to further areas is also ongoing in 2025 and 2026.
Responsible	Management, IT Coordination, Consultancy Coordination
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	Further digitisation measures are underway, e.g. extension of the ELO archiving tool to other departments.
Assessment	Original target – 40% reduction by 31 December 2023 – not achieved. A downward trend continues to be observed, but there is no significant decline. This is more of a medium-term target. New target set for 2027.

Objective	7. Warehouse logistics: Switching from fossil fuel-powered machinery to renewable energy sources (new in 2022)
Actions	Measures for 2023: Further optimisation, replacement of machinery (electric high-pressure cleaners)
Responsible	Management, Innovation Coordination, Reverse Production Coordination
Deadline	Not applicable
Status	Measures have been implemented as far as possible.
Assessment	Positive development. The figures for machine fuel consumption in 2025 show that the switch has already been largely successful. Further improvements are not currently possible, as they are not economically viable and do not make sense in terms of the carbon footprint.

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 regards indirect environmental aspects, quantification is not feasible given the available data.

7.2. Indirekte Umweltaspekte

Objective	1. Increasing consumption of sustainable products (non-food sector) – Shop Green Continuous adaptation and further development of criteria;
Actions	2019: Greater focus on packaging (sustainability, circular economy); updating of criteria; assessment of further potential product categories 2020: Updating of criteria; commencement of market analyses 2021: Further development of the concept, market support and training of sales staff 2022: Renaming of 'Clever akafen' to 'Shop Green'. Reason: Request from retail partners to emphasise more clearly that the initiative promotes environmentally friendly products. 2023 Market support; inclusion of the 'Leave on' product category in personal care products, development of an online tool to inform and raise awareness among retail staff 2024: Introduction of the 'Leave on' product group (without resonance); further intensive market support
Partners	Retail, suppliers, manufacturers, Confédération (de commerce), Union Luxembourgeoise des Consommateurs, ministries, EBL
Responsible	Management, coordination of consultancy and additional activities, coordination of communications
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	Successful implementation of the transition from 'Clever akafen' to 'Shop Green'. Further development using existing tools, particularly the ongoing market analysis.
Evaluation	Market analyses continued in 2025. The response to Shop Green remains positive from both the retail sector and consumers.

Objective	2. Welcome pack and information sheet – Information for residents and new residents of local authorities to support waste separation and prevention
Actions	Application via the advisory service; distribution of welcome packs in local authorities/associations 2021: Conducting a market analysis to identify current needs. Based on the results of the market analysis, the distribution of the welcome pack will continue in accordance with the wishes/requirements of the municipalities. 2022–2023: The distribution of the welcome pack will continue in accordance with the wishes/requirements of the municipalities. From 2023 onwards: Sending out the information sheet for publication in local newsletters
Partners	Producer schemes: Ecotrel, Ecobatterien, Valorlux, as well as the municipalities and municipal syndicates
Responsible	Management, Coordination of Consultancy & Innovation Projects and Communications Coordinator
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	The welcome pack was used only a few times in 2025 as well. The information sheet, on the other hand, is becoming increasingly popular. 65 out of 100 municipalities are demonstrating their interest by including their municipal logo.
Evaluation	Further municipalities will not use the welcome pack. Instead, they are increasingly using other tools such as the information sheet for municipal newsletters.

Objective	3. Integrating sustainability topics into schools
Actions	2018: Development of specific, practical documents aligned with the curriculum; pilot scheme in selected partner schools; topics including sustainable waste management, sustainable consumption, sustainable living in the community, ... 2019: Expansion to national level; further projects: joint development and use of practical materials (media, films, stories, posters) on the topic of sustainable consumption; YouTube channel 2020: Further development of digital resources (e.g. YouTube tutorials). From 2021 onwards: Ongoing: Development and use of practical materials (media, films, stories, posters) on the topic of sustainable consumption 2024: Further digital offerings (e.g. VR) via the so-called 'Circular-Lab' (a mobile games laboratory)
Partners	Primary schools, secondary schools, after-school care centres
Responsible	**Management, coordination of the SDK Academy**
Deadline	Ongoing review, reassessment by 31 December 2026
Status	Projects are underway.
Evaluation	Cooperation with the relevant institutions (SCRIPT, IFEN) is established.

Objective	4. Further development of national collection systems in the retail sector to improve the collection of recyclable and problematic products and reduce residual waste
Actions	2018–2021: Participation in the development of the national waste app to showcase all waste collection services; installation of collection cabinets (e.g. Cactus, Auchan); further collaboration on the implementation of the national waste management plan with the aim of standardising collection systems. From 2022: Collaboration on the implementation of the national waste management plan with the aim of further developing collection systems in the retail sector will continue.
Partners	Producer systems: Ecotrel, Ecobatterien, as well as the municipalities and municipal syndicates, Confédération Luxembourgeoise de Commerce
Responsible	Management, coordination, consultancy and ancillary activities, and communication coordination
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	The revision of national legislation is underway. The **SDK** continues to support the Ministry of the Environment and the Environmental Administration in the further development of collection systems, but now explicitly limits itself to problematic products.
Evaluation	The **SDK** is now largely playing a supporting role in this area and, in practice, limits itself to problematic products.

Objective	5. Further development/replacement of input-based recycling rates with an output-based tool that reflects the realistic recovery of (secondary) raw materials (resource potential) 2018–2021: further promotion; campaign at EU level and with national authorities; recruitment of additional partners for certification (covering both remanufacturing and production);
Actions	Assessment of resource potential for **SDK** consumables; assessment of resource potential for new products – inclusion of reparability From 2022: The measures from previous years will be continued. Existing certifications have been updated or extended. Positioning at EU level remains the objective.
Partners	Product recipients, producers of goods and consumables
Responsible	Management, coordination of advisory and ancillary activities, and coordination of communications
Deadline	Ongoing review, reassessment by 31 December 2026
Status	The revision of national legislation is underway. The **SDK** continues to support the Ministry of the Environment and the environmental administration in the further development of collection systems, but now explicitly limits itself to problematic products.
Evaluation	The **SDK** is now largely playing a supporting role in this area and, in practice, limits itself to problematic products.

Objective	6. Raising awareness of the circular economy among organisations and businesses
Actions	Ongoing: Providing information to businesses and organisations as part of the **SDK** for Businesses; highlighting resource potential and other innovation projects within the waste management strategy; active collaboration on partners' projects; supporting the services offered by the House of Sustainability and the Fit 4 Sustainability and SME Packages programmes as part of the Climate Pact for Businesses initiative; Conceptualised in 2024 and used specifically in consultancy work since 2025: specific waste prevention guidelines
Partners	House of Sustainability, Luxinnovation and Ecoinnovation Cluster; LIST, University of Luxembourg, Klimapakt Gemeinden
Responsible	Management, Coordination, Consultancy and Additional Activities
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	Ongoing review of requirements.
Evaluation	The circular economy continues to be addressed within institutions and businesses. Information is provided on the partners' projects.
	The planned measures are being implemented. Raising awareness among businesses through ongoing information on innovation projects. It is not possible to quantify or evaluate the success.

Objective	7. Further development of waste collection systems in residential buildings to improve the sorting of recyclable and problematic waste and reduce residual waste – equipping participating residential buildings with waste chutes
Actions	2018–2020: ongoing advice and support with the installation of collection points; Support with the installation of waste chutes; development of a cost-effective model to increase the appeal of waste chutes; campaign to promote further installation of waste chutes; 2021: intensive promotion of the label; new concept for awarding the label; from 2022: The measures will be continued. Delivery of further training courses, both for property management companies and residents, with a focus on a 'train-the-trainer' concept. 2025: Adaptation of the concept; some of the services will be subject to a fee
Partners	Residences, property management companies, GSPL (Association of Property Management Companies), local authorities;
Responsible	Billing service providers
Deadline	Management, Coordination of Consultancy and Additional Activities, Communications Coordinator, Project Manager for Residences
Status	Ongoing review, reassessment as at 31 December 2026B
Evaluation	Due to the new legal requirements, demand for **SDK**'s services has continued to grow positively. The number of labelled residences remains at 37.
	Development remained positive and on target in 2025, despite the introduction of charges for certain services

Objective	8. Reducing food waste – Design and use of reusable containers for the catering industry and events (ECOBOX)
Actions	Distribution of over 100,000 ECOBOXes by the end of 2022; coordination and testing of further reusable containers; Cooperation with local authorities on the use of ECOBOX at events and festivals 2020/2021: Further strengthening of cooperation with local authorities, canteen operators and caterers; 2022: Promotion of Partyrentab's offering 2023: General promotion of reusable containers in the catering and hospitality sector. Support for other providers in Luxembourg. Further promotion of the ECOBOX.
Partners	Ministry, IMS, Horesca, canteens, restaurants, clc, Chamber of Commerce, Chamber of Trades
Responsible	Management, Coordination, Consultancy & Additional Activities, Communications Coordinator, 'Clever Iessen' project team
Deadline	Ongoing review, reassessment on 31 December 2026
Status	Measures are underway.
Evaluation	Positive trend: As at 31 December 2025, over 160,000 ECOBOXes had been distributed, representing a further increase of over 10,000 compared with the previous year.

Objective	9. Increase in the number of people qualified by the training department; expansion of the training programme
Actions	2018/2019: Improvement of the department's management system; engagement with national stakeholders in vocational further education 2020–2021: further diversification, expansion and implementation of the concept; increased provision in collaboration with national training institutions; Further development of the management system and the software used. 2022: Programmes in collaboration 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
Partners	Employment Agency, local authorities, government institutions, schools
Responsible	**Management, Coordination of the SDK Academy**
Deadline	Ongoing review, reassessment by 31 December 2026
Status	Measures are underway. In 2022, a new strategy paper was agreed with the Ministry of the Environment to better meet the requirements of the **SDK** Academy.Following a request from the Chambre des Metiers at the end of 2025 to develop e-learning modules specifically for SMEs in the skilled trades sector, a corresponding concept paper was drawn up for 2026.
Evaluation	The **SDK** Academy's offerings have been very well received. Participant numbers remain high.

Objective	10. Conserving resources through repair and the sharing economy – the 'Repair & Share' project
Actions	Ongoing: Recruiting further businesses, particularly from the skilled trades sector; supporting businesses that offer repair services; expanding the website to include general information on the topic of repair; 2020–2021: Discussions with Repair Café and other stakeholders on further developing the service; collaboration and networking with existing projects such as Social ReUse or Rethink will be pursued further. Conducting market analyses. The reorientation of the concept resulted in the project being renamed 'Repair & Share'. The website was revamped as planned. From 2023, the project will be further promoted in collaboration with the Chambre des Métiers. In 2024, the latter stepped up activities with the aim of introducing a national repair bonus and, in 2025, conducted a survey among potential providers of repair services.
Partners	Ministries, Chambre des Métiers, Chambre de Commerce, Oekozenter Pafendall, Ecotrel, INDR, Repair-Café Luxembourg, Cell
Responsible	Management, Coordination, Consultancy and Additional Activities, Communication Coordination, 'Share & Repair' Project Team
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	The conceptual review was completed at the end of 2022. Enhanced promotion is underway, although the number of registered businesses has not increased significantly.
Evaluation	The project is significantly influenced by framework conditions (EU and national legal frameworks). Further development is not expected until the European 'Right to Repair' Directive enters the implementation phase.

Objective	11. Green Events: Making events more environmentally friendly through waste prevention and separation
Actions	2019: Campaign launched in September; website launched; increased advisory support; first 'Green Events' and 'Mir engagieren eis' labels awarded. 2020/2021: Measures were maintained; increased cooperation with local authorities; further awarding of the 'Green Events' and 'Mir engagieren eis' labels. 2022: Measures will be maintained. From 2022: Measures will be maintained. Increased support for events; cooperation with local authorities; participation in the Green Business Events project. Publication of a brochure for municipalities. 2025: In addition to ongoing advisory services, support for the Ministry of the Environment following the termination of the partnership with Oekozenter Pafendall and handover to the new operator EBL (Emweltberodung Letzebuerg)
Partners	Oekozenter Pafendal (until December 2025), ministries, municipalities, EBL (Emweltberodung Lëtzebuerg)
Responsible	Management, coordination of consultancy and additional activities, coordination of communications, project management
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	Measures are underway. Local authorities are becoming increasingly involved in promotion and implementation – partly due to the legal framework.
Evaluation	The response remains positive, partly due to the new legal framework (restrictions on grants). In 2025, fewer consultations were carried out than in the previous year, namely 242, of which 86 were conducted by the **SDK**. A significant proportion of the stakeholders advised in previous years now organise events independently and sustainably.

Objective	12. Integration and raising awareness among refugees regarding the management of waste and resources
Actions	Ongoing: continuous support for facilities; further improvement of collection; raising awareness among refugees about waste prevention; from 2023, increased training based on the 'train-the-trainer' concept
Partners	ONA (formerly OLAI)
Responsible	Management, Training Coordination, Project Team
Deadline	Ongoing review, reassessment on 31 December 2026
Status	Ongoing review of requirements.
Evaluation	In 2025, support and training measures continued as planned. Quantitative data on actual waste prevention is not currently available.

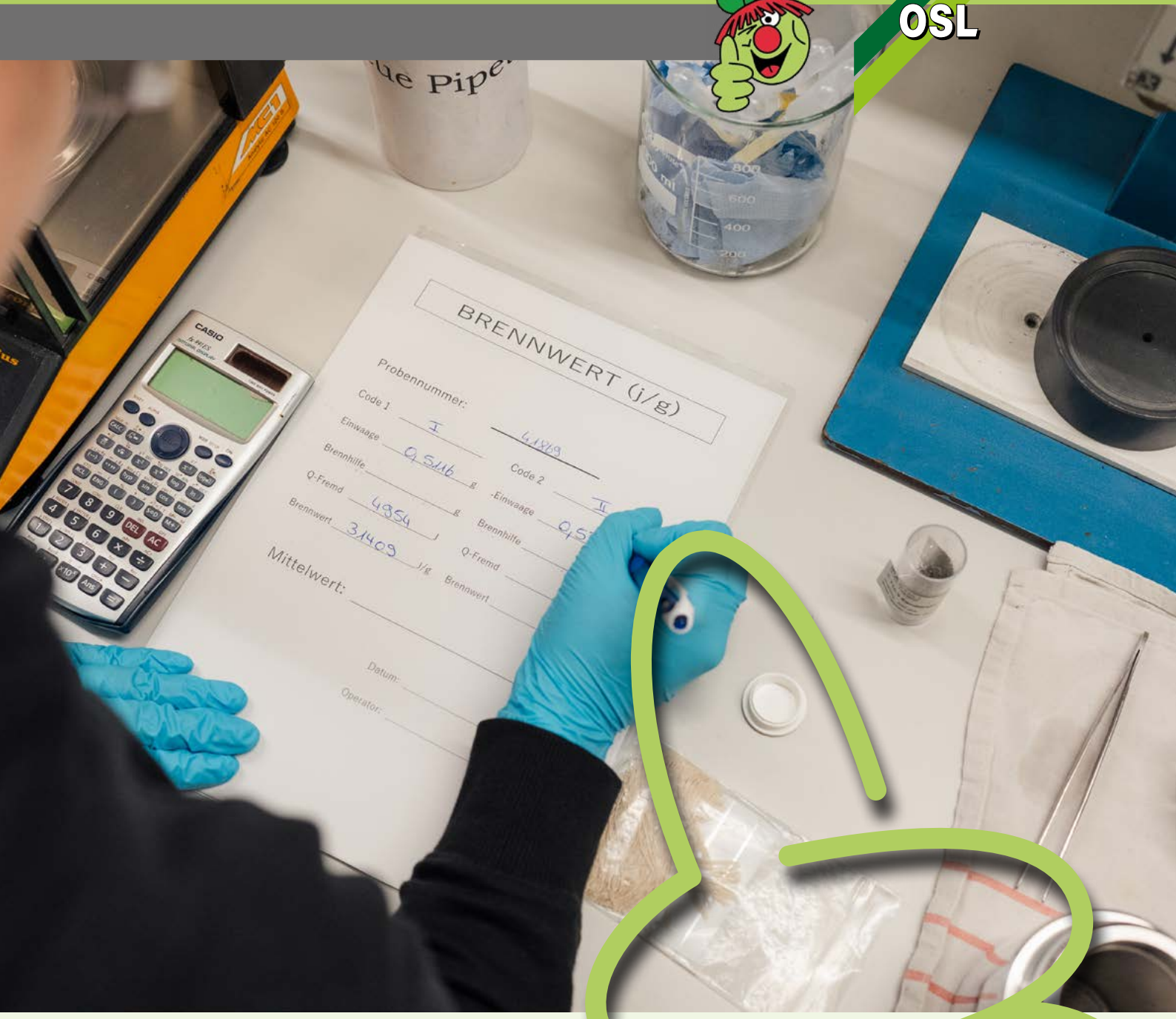
Objective	13. Further reduction of the risk posed by problematic products in private households
Actions	2018–2020: Awareness campaigns on railway sleepers and treated timber, on lithium batteries in collaboration with Ecobatterien, and on the handling of medicines, spray cans, and paints/varnishes. 2021: Ongoing monitoring of developments; continuation of the campaigns. Key topics in 2021 included fireworks/explosives and the potential hazards of high-energy (lithium) batteries. From 2022: Measures will be pursued; ongoing monitoring of developments
Partners	Municipalities, Ecobatterien, health sector
Responsible	**Management, Coordination, Advice & Additional Activities, SDK for Citizens**
Deadline	Ongoing review, reassessment by 31 December 2026
Status	Measures are underway. In 2023, the issue was generally promoted further. Prevention effects are becoming apparent. However, in 2024, new products 'emerged' or saw a sharp increase that had not played a role in previous years and represent new potential hazards, in this case nitrous oxide canisters.
Evaluation	Measures have been implemented as planned.

Objective	14. Practical implementation of a sharing economy aimed at waste prevention in schools (see also point 3.)
Status	Project completed. The topic has been incorporated into general education for sustainable development. At national level, there are a number of projects, including Mol nachemol https://molnachemol.lu and Gutt Saach https://www.guttsaach.lu , which are supported by the **SDK**.

Objective	15. Implementing the circular economy in the construction sector: improving resource efficiency through better planning
Actions	Ongoing: Information and awareness-raising; collaboration with architects; involvement in the building materials passport for future demolition; application of the resource potential concept; expansion of tools for the separate collection of waste products; 2018–2021: Introduction and marketing of the LECOBOX; 2022–2025: Continuation of ongoing measures; enhanced training initiatives via IFSB
Partners	Architects, LIST, University, construction industry, Administration des Bâtiments Publics, Construction Industry Training Institute (IFSB), other public developers
Responsible	Management, Coordination, Consultancy and Additional Activities, Construction Project Team
Deadline	Ongoing review, reassessment as at 31 December 2026
Status	Medium-term planning. In the meantime, the major public developer SNHMB (Société Nationale des Habitations à Bon Marché) has included the **SDK** label for operators in the construction sector in its tender criteria.
Evaluation	The importance of **SDK** consultancy is also continuing to grow as a result of the new legal framework. Positive development.

Objective	16. Further reduction of environmentally contaminated sites in agriculture and viticulture
Actions	Ongoing: Providing advice to agricultural and viticultural businesses with the aim of connecting them to the **SDK** für Betriber; continuing to identify needs through cooperation with Maschinenring MBR and ASTA; by 2021: Management of the collection and recycling of plastic sheeting and other plastics, as well as vineyard posts and fruit tree stakes from agriculture
Partners	Ministry of Agriculture, MBR (Maschinenring), ASTA (Agricultural Administration)
Responsible	Coordination of consultancy & additional activities, project management for agriculture
Deadline	Project completed
Status	Ongoing assessment of requirements with the help of partners MBR and ASTA. The **SDK** is available to provide advice as required.
Evaluation	The expertise acquired by the **SDK** in the collection of agricultural films and posts is now being utilised by third parties. The project has been completed. The response to the advisory services provided to agricultural businesses remains positive.

Objective	17. Reducing the amount of problematic products in private households that still end up in residual waste (new target for 2019/2020; see also point 13)
Actions	2020/2021: increased public awareness through public relations/campaigning; in particular regarding medicines and cosmetics, aerosol cans and paints/varnishes; measures will be pursued; ongoing monitoring of developments. In 2023 and 2024, based on the results of the residual waste analysis, the focus will be on paints/varnishes, medicines, aerosol cans and, newly, waste containing bitumen. 2025: due to the exponential increase in the volume of nitrous oxide cartridges, public relations work has focused on this area
Partners	Municipalities, retail, pharmacies
Responsible	Coordination of advisory services & additional activities and communication, project management by **SDK** für Bierger
Deadline	Ongoing review, reassessment by 31 December 2026
Status	Current waste volume balances and the results of the 2026 residual waste analysis as the basis for information and awareness-raising campaigns.
Evaluation	The 2022 residual waste analysis shows a significant decline in problematic products within residual waste, indicating increased awareness of the issue and efforts to prevent it. In 2024, the volume of problematic waste per year and per inhabitant had also fallen. A new residual waste analysis was carried out in 2025. The results have not yet been published.



8. DECLARATION OF CONFORMITY AND ANNEXES

8. DECLARATION OF CONFORMITY AND ANNEXES

With this 2026 Environmental Statement for the 2025 reporting year, we aim to inform our employees, customers and the interested public about environmental protection at the **SuperDrecksKëscht® campaign**. We certify the accuracy of the information contained in this environmental statement and approve it for publication. The Management is responsible for the content and approval of this environmental statement.

Furthermore, by signing here, we confirm compliance with all

legal and other binding obligations applicable to us.

We also confirm our commitment to the continuous improvement of environmental performance and the operation of the necessary management system.

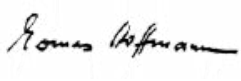
The Management of the **SuperDrecksKëscht® campaign** – project manager: Oeko-Service Luxembourg S.A.

Colmar-Berg, March 2026

SIGNATURES

← **Hans-Peter Walter - management,**
Oeko-Service Luxembourg S.A. (chargé de mission)

← **Frank Fellens - management,**
Oeko-Service Luxembourg S.A. (chargé de mission)



← **Thomas Hoffmann - Environmental Management Officer**
Oeko-Service Luxembourg S.A. (chargé de mission)

The next updated environmental statement will be published in April 2027.

Statement of Validity

The environmental verifiers listed below confirm that they have verified that the site, as specified in the present 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 of organisations in a Community eco-management and audit scheme (EMAS).

Name of the environmental verifier	Registration number	Accredited for the following 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 were carried out in full compliance with the requirements of Regulation (EC) No 1221/2009, as amended by Commission Regulations (EU) 2017/1505 and (EU) 2018/2026,
- the outcome of the assessment and validation confirms that there is no evidence of non-compliance with applicable environmental legislation; and
- the data and information in the environmental statement provide a reliable, credible and truthful picture of all the organisation's activities.

This declaration 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 must not be used as a standalone basis for informing the public.

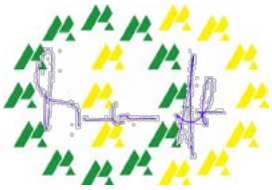
Berlin, 9 March 2026

Christian Ruhe Environmental Verifier DE-V-0386

GUT Certification Company for Management Systems mbH Environmental Verifier DE-V-0213

Eichenstraße 3 b
D-12435 Berlin

Tel: +49 30 233 2021-0
Fax: +49 30 233 2021-39
Email: info@gut-cert.de



Markus Grob Environmental Verifier DE-V-0363

Dr Georg Sulzer Environmental Verifier DE-V-0041

Translation of the German original

GLOSSARY AND LIST OF ABBREVIATIONS

ADR	European Agreement concerning the International Carriage of Dangerous Goods by Road
a	annum (Latin) = year
CO	carbon monoxide
CO_2	carbon dioxide
DIN EN ISO	Environmental management systems – Requirements with guidance for use (international standard)
ECOBOX	Reusable containers for the transport and storage of food
EMAS III:	Eco-Management and Audit Scheme Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation of organisations in a Community eco-management and audit scheme, as amended in 2017 (Regulation (EU) 2017/1505) and 2018 (Regulation (EU) 2018/2026)
ESR Label	Entreprise socialement responsable – Luxembourg label for socially responsible businesses
kWh	Kilowatt-hour
kWpeak	maximum power that a PV system can achieve under ideal conditions
l / m^2 / m^3	litres / square metres / cubic metres
LECOBOX	mini-containers for the separate collection of recyclable and hazardous waste
LED	light-emitting diode
MA	employees
MECB	Ministry of the Environment, Climate and Biodiversity
NO_x:	nitrogen oxides
PM	Particulate Matter
SDK	SuperDrecksKëscht® campaign
SO2	Sulphur dioxide
to	Tonnes
TOC	Total Organic Carbon
UMB	Environmental management officer
UMS	Environmental management system
ULC	Union Luxembourgeoise des Consommateurs
VOC	Volatile Organic Compounds

CONVERSION FACTORS AND SOURCES

Energy content and volume to weight

Sources:
Energy label for passenger cars, Swiss Federal Office of Energy, Jan 2017
Conversion values (kg to l) according to BDB – Federal Association of the German Bioethanol Industry

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

Emissions to air

Emission factors for the greenhouse gas accounting of organisations – German Federal Environment Agency
Carbon Metric Factors Zero Waste Scotland 2011–2020 dated 15 December 2021
DSLV Guide to the Calculation of GHG Emissions, as of March 2013
Table K.1 – DIN EN ISO 14083:2023 Quantification and reporting of greenhouse gas emissions from transport operations
Nitrogen oxides and particulate matter: Maximum limits from the EU Euro 6 emissions standard
Life cycle assessment of used kitchen oils; proTerra Life cycle assessment of the recycling of used kitchen oils and oils – Update 2022–2023 dated 6 March 2023
Basic data on bioenergy in Germany

Further calculation bases and sources are available on request.

ENVIRONMENTAL PROGRAMME – RESPONSIBLE PERSONS

Management: Frank Fellens, Hans-Peter Walter
Academy Coordination: Jeff Schmit (Aka)
Consultancy Coordination: Carlo Guetti, Romaine Stracks and Petra Biwersi
IT Coordination: Jan Welter and Andreas Zock
Innovation Coordination: Horst Lischka
Collection Logistics Coordination: Peter Scheer
Communications Coordination: Thomas Hoffmann, from 2026 Chiara Wohl and Tamara Merenz
Coordination of Additional Activities: Romaine Stracks
Construction Project Team: Eric Corrignan and Jeff Schmit (Ber)
Agriculture Project Team: Patricia da Mota
SDK fir Bierger Project Team: Petra Biwersi and Nancy Ludwig

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

Ministère de l'Environnement, du Climat et de la Biodiversité

4, place de l'Europe

L-1499 Luxembourg

www.emwelt.lu

Administration de l'environnement
Grand-Duché de Luxembourg

Administration de l'environnement

1, avenue du Rock'n Roll

L-4361 Esch-sur-Alzette

www.emwelt.lu

CHAMBRE DES MÉTIERS
LUXEMBOURG

Chambre des Métiers

2, circuit de la Foire internationale

L-1347 Luxembourg

www.cdm.lu

CHAMBER OF COMMERCE
LUXEMBOURG
POWERING BUSINESS

Chambre de Commerce

7, rue Alcide de Gasperi

L-2981 Luxembourg-Kirchberg

www.cc.lu

SuperDrecksKëscht®
powered by
Oeko-Service Luxembourg S.A.

Zone Industrielle Piret
L-7737 Colmar-Berg
Tel.: 488216-1

e-mail: info@sdk.lu
Internet: www.sdk.lu

03/2026