



Oeko-Service Luxembourg SA is mandated by the amended act of 25 March 2005 on the function and financing of the SuperDrecksKëscht® campaign

Human Rights Report 2023

SDK/SuperDrecksKëscht – Oeko-Service Luxembourg SA

In Luxembourg, **SuperDrecksKëscht®** (SDK) is an initiative of the Ministry of the Environment, Climate and Biodiversity with the municipalities, the Chamber of Skilled Trades and Crafts and the Chamber of Commerce as part of national waste management.

The brand **SuperDrecksKëscht®** (SDK) was developed as part of the resource strategy of the State of Luxembourg. It is based on the strategy (hierarchy) laid down by the EU, which puts prevention first, followed by preparation for re-use, recycling and any other recovery (e.g. energy recovery), and finally waste disposal. The task of the **SDK** campaign consists of using and implementing the latest information in order to achieve sustainable and high-quality materials management in an ecological and economic sense. This task enables it to play an exemplary role in the ecological restructuring of our society. This leading role is intended to provide impetus for all those involved in the national economy with the aim of environmental relief and resource efficiency.

The authorised company ("chargé de mission") Oeko-Service Luxembourg S.A. enters all legal and otherwise binding obligations such as approvals and contracts for the **SuperDrecksKëscht®** campaign. The highest advisory body of the **SuperDrecksKëscht®** campaign is the six-member steering committee consisting of the representative of the Ministry of the Environment, Climate and Biodiversity (MECB), the Environment Agency, the representatives of the Chamber of Skilled Trades and Crafts and Chamber of Commerce, as well as the management of the commissioned company.

Hereafter, **SuperDrecksKëscht – Oeko-Service Luxembourg S.A.** is abbreviated to **SDK**.

SDK signed the National Pact on Business and Human Rights on 06.07.2022 and has thus committed to raising employee and stakeholder awareness of human rights, appointing a human rights officer, training its employees on human rights, installing a corporate strategy to identify human rights issues, establishing a process for reporting human rights violations and publishing an annual human rights report.

Policy statement (A1)

SDK declares on its website

<https://sdk.lu/en/protection-of-human-rights/>

that it is committed to protecting human rights in accordance with the provisions of the National Pact on Business and Human Rights and publishes the Declaration of Human Rights on the aforementioned website. The obligation to protect human rights is also outlined in the published reports (see below). (A1.3, C1.2).



Some specific areas have been defined as part of the certifications, particularly with regard to corporate social responsibility, but also as part of the environmental management systems. For example, the **SDK**'s environmental code contains areas of human rights.

SDK has been certified with the CSR label for corporate social responsibility since 2011. It has also been certified to the ISO 14001 environmental management standard since 1999 and to the European EMAS since 2016. As part of this, it publishes annual sustainability reports based on the international GRI standards. As a campaign run on behalf of the MECB, **SDK** has also committed itself to complying with the UN Sustainable Development Goals, which form the basis of the third National Plan for Sustainable Development.

Accordingly, areas of respect for human rights were developed as part of the development of management systems and auditing (A1.1). As the **SDK** campaign primarily relates to national resource management and sustainable development, the focus is on national stakeholders (A1.2).

On 26.09.2019, **SDK** also signed the Diversity Charter Lëtzebuerg, which is supported by the Ministry of Family Affairs, Solidarity, Living Together and Reception of Refugees.

This commitment is reflected in the annual sustainability report, which is communicated to employees and stakeholders. It also raises awareness among staff and stakeholders (C1.2).

Embedding human rights in the company (A2, C1)

Corporate strategy

The corporate strategy set out in the environmental policy and the **SDK** guidelines (see Appendices 1 and 2) contains general guidelines on human rights policy.

Human rights officer and CSR team (A2.1) (see Appendix 3)

As requested, the **SDK** has appointed a human rights officer by signing the declaration of commitment and anchored this in the officers' organisational chart. The CSR team and the staff delegation also deal with human rights issues. The CSR team also includes a member of the management.

The topics discussed by the CSR team cover all areas that are also covered by CSR label, i.e. corporate strategy, business management, corporate social responsibility in particular and the environment/sustainable development. Procurement/purchasing in particular is a human rights-relevant topic (A2.2, C1).

Topics discussed between the staff delegation and the management include, in particular, compliance with the guidelines, especially those relating to employees' rights (A2.2).

The steering committee, which supports all **SDK** activities in an advisory capacity, also deals with human rights-related topics as part of EMAS/ISO 14001 certification, in particular requirements, opportunities and risks in connection with stakeholders. (A2.2).

The EMAS/ISO 14001 certification includes an environment/sustainability programme that is updated annually. It also covers points related to human rights. As far as possible, quantitative key figures are used to check fulfilment of the goals (C5).

Sensitisation and training of employees (A2.3)

The mandatory EMAS training programme, which is held every two years for all employees and for all new employees in the course of their recruitment year, covers the topic of human rights, particularly in connection with the procurement criteria and stakeholder management. The next mandatory training for all employees will take place in 2024. The topic of human rights will once again be dealt with separately and explicitly.

Furthermore, there is ongoing training and sensitisation of employees on the topic of sustainable development, which in many respects also touches on human rights issues.

Process for reporting human rights violations

This was already possible within the framework of the guidelines and EMAS/CSR strategy, but not yet explicitly stated. An internal reporting office for employees was set up in December 2023 as part of the whistleblower protection legislation (Law of 16 May 2023 transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019). A reporting office for external stakeholders and the development of the process for whistleblowers is in progress and will be finalised in early 2024 (C6). (see Appendix 6)

Stakeholder management in the context of value chains (A2.4, C2)

As part of the EMAS/14001 EMS, **SDK** has defined requirements and expectations as well as opportunities and risks for all stakeholders. The key stakeholders and the type of cooperation are listed in a stakeholder management list. Meetings with key stakeholders are recorded in minutes. Human rights issues are also covered, particularly with regard to procurement criteria and criteria for establishing business relationships. **SDK's** activities are generally limited to Luxembourg. Suppliers come from Luxembourg and the neighbouring EU countries. However, there are franchisees in Switzerland, Sweden and Germany. A conformity test is used to check compliance with the **SDK** philosophy.

Human rights focal points / key areas (B)

No serious human rights violations were observed in 2023, neither at **SDK** directly nor at franchisees (C3).

SDK in Luxembourg has identified 2 key areas: procurement and purchasing of resources and goods, as well as the processing of waste products and their transport to the product recipients (recycling/disposal companies).

1. Procurement of resources and goods

Supplier criteria

Suppliers with the “**SDK fir Betriber**” label are given priority. The criteria then applied are participation in the “**SDK fir Betriber**” concept without a label and presentation of environmental certification. The principle of proximity is applied, as companies based in Luxembourg are selected first. Companies from the social economy are also prioritised.

Compliance with human rights is not explicitly part of the selection criteria, but is indirectly given through compliance with the supplier criteria.



No serious human rights violations were observed involving any suppliers in 2023 (C3).

Product criteria

The product criteria include the following: socially acceptable working conditions in production (minimum ILO requirements; right to a living wage and healthy working conditions), as well as fair trade.

Compliance with the product criteria is randomly checked by the CSR/human rights officer.

Examples:

- Work clothes: fair trade certified work clothes – e.g. when handling chemicals and highly flammable products – as far as safety aspects permit
- Coffee: fair trade certified coffee
- local products, such as “Téi vum Séi”, Ramborn products

2. Processing of waste products and their transport to the product recipients

Product recipients are selected in accordance with the strict legal requirements of the Act of 21 March 2012 as amended on 9 June 2022, in particular with regard to §13 Recovery, §14 Reuse, preparation for reuse and recycling, §15 Disposal and §16 Principles of self-sufficiency and proximity. This ensures a priori that no exports are made outside the European Economic Area (EU and Switzerland) and that the strict European laws on labour and social rights are complied with.

SDK also carries out audits at regular intervals and favours companies with certified environmental management systems and other certifications (C4).

The resource potential also provides a transparent presentation of the reverse production (recycling) processes and a detailed quantitative list of the secondary raw materials produced during the processes. **SDK** prioritises product recipients with the greatest possible recovery of secondary raw materials.

The raw materials marketed by the product recipient are not (yet) tracked. However, it can be assumed that these will remain in the European Economic Area.

Used cooking oil is a special case. The REDCert certification system ensures that the raw materials come from legal sources and not from non-sustainable agriculture (such as non-sustainable palm oil from cleared rainforests).

No serious human rights violations were observed involving any product recipients in 2023 (C3).



Appendix 1 Environmental policy

Appendix 2 Guidelines

Appendix 3 Officers' organisational chart

Appendix 4 Procurement criteria

Appendix 5 Table Human rights SDK

Appendix 6 Reporting of complaints, objections and claims