2024 Environmental Statement

(From 1January 2024 to 31 December 2024)

European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice

www.eulisa.europa.eu

ENVIRONMENTAL STATEMENT 2024

EMAS
VERIFIED
ENVIRONMENTAL
MANAGEMENT
EE-000032

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1. Foreword

Dear Colleagues,

The world today faces numerous and mounting challenges to environmental sustainability, including but not limited to climate change.

eu-LISA actively incorporates environmental sustainability into its policies and practices, guided by the EU Green Deal and Sustainable Development Goals.

In 2022, the Agency committed to improving its environmental performance and reducing its environmental impact by implementing an environmental management system following the EU's Eco-Management and Audit Scheme (EMAS) regulation, taking significant steps to obtain EMAS registration.

In 2024, eu-LISA also committed to an ambitious goal: to be **carbon neutral by 2030**.

Hence, implementing an EMAS-aligned environmental management system is not just a certification — it is a strategic step towards achieving the Agency's environmental targets. With EMAS registration, eu-LISA can look forward to an environmentally conscious future and reduce its carbon footprint throughout its daily operations by focusing on key priorities.

Today, I am pleased to present eu-LISA's Environmental Statement for the year 2024.This Statement reflects our dedication to environmental responsibility and serves as a testament to our ongoing efforts to create a greener, more sustainable future for all.

I extend my gratitude to all eu-LISA staff members for their dedication and contribution to achieving our environmental objectives. Together, we will continue to lead by example and inspire positive change within our organisation and beyond.

Best regards,

Marili Männik
eu-LISA Executive Director ad interim

2. About this document

This Environmental Statement provides all relevant stakeholders and other interested parties with information concerning the environmental performance and activities of eu-LISA in 2024 (reporting year from 1 January 2024 to 31 December 2024).

This document has been drafted in accordance with the Eco-Management and Audit Scheme (EMAS) Regulation[1] in its latest applicable version [(EU) 2017/1505[2] and (EU) 2018/2026[3]], while taking account of the sectoral reference document for public administration sector [Commission Decision (EU) 2019/61][4] and for the telecommunication and information and communication technologies (ICT) services sector [Commission Decision (EU) 2021/2054][5]

Annex I provides the validation of the EMAS verifier.

As per its Environmental Management System (EMS), eu-LISA will publish an Environmental Statement on an annual basis and will publish it on its website.

3. About EU-LISA

3.1. What we do

3.1.1. Product and services

eu-LISA is the European Agency for the Operational Management of Large-Scale IT systems in the Area of Freedom, Security and Justice. The Agency was established in 2011 and became operational in 2012.

The role of the Agency is to support the implementation of the EU's Justice and Home Affairs policies by managing large-scale IT systems that:

- → maintain internal security in the Schengen countries,
- → enable Schengen countries to exchange visa data,
- → determine which EU country is responsible for examining a particular asylum application.

[1] Consolidated text: Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS), repealing Regulation (EC) No 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC; **EUR-Lex - 02009R1221-20190109 - EN - EUR-Lex (europa.eu)**;
[2] Commission Regulation (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS); C/2017/5792 **EUR-Lex - 32017R1505 - EN - EUR-Lex (europa.eu)**
[3] Commission Regulation (EU) 2018/2026 of 19 December 2018 amending Annex IV to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS); C/2018/4429; **EUR-Lex - 32018R2026 - EN - EUR-Lex (europa.eu)**
[4] Commission Decision (EU) 2019/61 of 19 December 2018 on the sectoral reference document on best environmental management practices, sector environmental performance indicators and benchmarks of excellence for the public administration sector under Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS); C/2018/4424; **EUR-Lex - 32019D0061 - EN - EUR-Lex (europa.eu)**
[5] Commission Decision (EU) 2021/2054 of 8 November 2021 on the sectoral reference document on best environmental management practices, environmental performance indicators and benchmarks of excellence for the telecommunications and information and communication technologies (ICT) services sector for the purposes of Regulation (EC) No 1221/2009 of the European Parliament and of the Council; **EUR-Lex -** 32021D2054 **- EN - EUR-Lex (europa.eu)**

eu-LISA provides technological support for the EU countries' efforts to make Europe safer and helps ensure Europeans can travel freely within the EU, without compromising Europe's security.eu-LISA has the following NACE activities:

- 99.00: Activities of extraterritorial organizations and bodies (official one),
- 62.03 (complementary code): Computer facilities management activities (additional one due to its operational activities).

The Agency also tests new technologies to help put in place a more modern, efficient and secure border management system in the EU. It coordinates the testing and follow-up of the Smart Borders pilot project, the analysis of results and reporting on the pilot project, in close cooperation with the participating EU countries and the European institutions.

3.1.2. Mission, vision and core values

MISSION

Our mission is to support the EU and the Member States in their efforts to keep Europe open and secure through advanced technology.

VISION

We strive to provide high-quality, efficient services and solutions, align the advancing technologies with the evolving needs of the EU and the Member States, and drive digital transformation in Justice and Home Affairs.

CORE VALUES

Our vision and mission are translated into operational activities by applying the core values of accountability, transparency, excellence, continuity, teamwork and first-rate customer service.

ACCOUNTABILITY

Deploying a sound governance framework, cost-efficient operations and sound financial management.

TRANSPARENCY

Ensuring regular and open communication with the Agency's key stakeholders and engaging in continuous dialogue for defining the Agency's long-term strategy.

EXCELLENCE

Operating the right organisational structure, people and processes, ensuring service continuity and functional comprehensiveness of tools provided to the Member States.

CONTINUITY

Ensuring that the Agency will make the best use of the expertise, knowledge and investments of the Member States and will continue to develop them.

TEAMWORK

Seeking to empower each individual team member to make the best use of their knowledge and experience, contributing to shared success

CUSTOMER FOCUS

Ensuring that the Agency is aligned with the needs and demands of its stakeholders at all times.

EMAS serves as a pivotal tool in embodying eu-LISA's core values within its mission:

- The certification reinforces accountability and transparency by requiring open communication about the organisation's environmental impact and ongoing improvements.
- Pursuing EMAS reflects eu-LISA's commitment to excellence, not just in technological advancements but also in sustainable practices, aligning its operations with the values of continuity.
- The collaborative nature of EMAS, involving teamwork across departments, resonates with eu-LISA's commitment to working collectively.
- Additionally, the scheme addresses customer focus by responding to the demand for environmentally responsible practices, showcasing how eu-LISA's dedication to EMAS aligns seamlessly with its mission to support the European Union and Member States in ensuring Europe's security through advanced technology.

One of the strategic goals of eu-LISA is to 'Further evolve eu-LISA towards an efficient, agile and resilient organisation within the EU regulatory framework'. The EMS significantly contributes to this strategic goal through the following:

- Resource Efficiency and Sustainability:
    - The environmental management system contributes to resource efficiency goals within the Agency, aligning with the broader objective of being an efficient organisation.
    - Strategies to reduce waste, energy consumption, or other environmental impacts are part of resource alignment efforts.
- Compliance:
    - Seeking EMAS registration equals a commitment to complying with environmental regulations and relevant stakeholder requirements.
- Mission and Values:
    - Promoting the Agency's mission and values encompasses a commitment to environmental sustainability.
    - Demonstrating responsible environmental stewardship aligns with values related to corporate social responsibility.
- Key EU Agency Growth:
    - Demonstrating environmental awareness can contribute to the Agency's growth as a key EU agency, considering the increasing importance of sustainability in organisational reputation.

3.2. Teams and location

eu-LISA is located in four countries:

- the headquarters - administrative site - is located in Tallinn (Estonia), 3 627 m² - 141 employees;
- the operational site is located in Strasbourg (France), 7 842 m², including the Data Centre, approximately 438 employees;
- an administrative site in a rented building is located in Illkirch-Graffenstaden (France), since 2022, 2 074 m² - approximately 103 employees;
- a liaison office shared with other agencies is located in rented offices in Brussels (Belgium), 98 m² - 6 employees.
- an new administrative site in a rented building, is located in Strasbourg Aspire (France), since 1st September 2024, 4830 m² - 0 employee (during last quarterly 2024, building wasn't used, only planification of works was performed);

The Agency also request services from Austrians authorities to host backup systems in Sankt Johann im Pongau (Austria) through a site agreement.

As of 31 December 2024, eu-LISA employs 379 staff members (i.e. eu-LISA staff members under the scope of the Staff Regulations of Officials to the European Union ('the SR') and of the Conditions of Employment of Other Servants of the European Union ('CEOS'), Seconded National Experts to eu-LISA ('SNEs'), and interns). The number of external consultants (all temporary external consultants) was 309, on the same date. These data are used throughout the document in graphs where the number of employees is referenced.

The areas in m^2 mentioned above are taken from the eu-LISA "Single Programming Document 2025-2027".

The number of staff members is sourced from the HR team, the number of subcontractors was provided by the Security team and the number of external consultants was provided by the Contract management team.

The Environmental Management System applies equally to all employees.

With the return to the office following the phasing out of social restrictions in the context of the COVID-19 pandemic, 2023 is yearly reference to assess environmental performance.

3.3. Scope of the eu-LISA's Environmental Management System

The Environmental Management System (EMS) applies to the following eu-LISA's premises:

a. the Agency's headquarters in Tallinn, Estonia (TLL);

b. the operational site in Strasbourg, France (SXB);

c. the temporary site in Illkirch-Graffenstaden, France (ILK);

d. the Liaison Office in Brussels, Belgium (BXL).

e. the temporary site in Strasbourg, France (Aspire);

The back-up site of Sankt Johann im Pongau (Austria) is not included in the scope as it is not managed by eu-LISA.

The scope of eu-LISA's EMS covers all its administrative and technical activities, and its mission, mentioned above in 3.1.1, for all sites listed in 3.3; as knowing provision of implementation support services of the EU's Justice and Home Affairs policies by managing large-scale IT systems.

It applies to eu-LISA staff-members under the scope of the Staff Regulations of Officials to the European Union (the 'Staff Regulations') and of the Conditions of Employment of Other Servants of the Union, ('the CEOS')[6], to national experts seconded to eu-LISA (hereinafter referred to as 'SNEs')4, to external service providers and their staff (e.g. intramuros, extramuros, service providers other contractors), and to interns (hereinafter collectively referred to as 'eu-LISA staff or staff members').

An **Environmental Handbook** drawn up by the Agency Corporate Services Unit provides an overview of the EMS guidelines and vision, for internal use.

4. Description of the Environmental Management System

4.1. EMAS at eu-LISA

The Eco-Management and Audit Scheme[7] (EMAS), approved by the European Parliament and Council, is the European voluntary system designed for organisations wishing to evaluate, manage and improve their environmental performance. As sustainability is a growing concern for European citizens and industries, EMAS provides a structured framework for integrating environmental concerns in the management and day-to-day operations of any organisation.

With the adoption by the Commission of its **Green Deal**, it became obvious in 2020 that eu-LISA would have to assume its responsibilities to ensure that its own environmental impacts were managed. This gave birth to the EMAS project, and the aim of EMAS registration in 2024. At the end of 2024, eu-LISA's EMAS registration process was still ongoing.

With EMAS registration, eu-LISA will be committed to continuously lowering its environmental footprint from 2024 onwards.

This is therefore the first referenced Environmental Statement produced by eu-LISA.

[6] Council Regulation (EEC, Euratom, ECSC) No 259/68 of 29 February 1968 laying down the Staff Regulations of Officials of the European Union and the Conditions of Employment of Other Servants of the European Communities and instituting special measures temporarily applicable to officials of the Commission (OJ L 56, 4.3.1968, p. 1), as amended by Regulation (EU, Euratom) No 1023/2013 of the European Parliament and of the Council of 22 October 2013 (OJ L 287, 29.10.2013, p. 15).
[7] EMAS − Environment - European Commission (europa.eu)

4.2. Context and purpose of eu-LISA's environmental management system

eu-LISA works with a wide range of stakeholders (Table 1): from its staff to local contractors; from the EU Member State stakeholders to European institutions. Some of these have a key influence on the Environmental Management System, the direction that it should take, or the progress that it should make.

Stakeholder(s)	Needs and expectations of the stakeholder(s)	How we ensure it is fulfilled
European Union bodies: the EC, EP, ECA, and others	Execution of tasks and activities in accordance with guidelines, regulations, legal acts, agreed terms of reference and specific requirements that the EC / other EU bodies may adopt for specific activities	Satisfactory audit results
Local authorities	Compliance with environmental legislation	No notification for non-compliance
eu-LISA staff members	Work environment compliant with health and safety rules. Work environment that expresses concerns for the environment, consistent with the Agency's mission. Work environment that provides forms and means of participation.	Staff feedback, through the staff committee or a dedicated 'go green' e-mail address.
Members States and their representatives	Optimisation of travel, remote working. Risk of duplication of data, multi-layer of equipment redundancy, … leading to extra environmental impacts	Replies to requests for information, questions or requests received. No complaints received
eu-LISA top management	Enhance the Agency's social and environmental sustainability (part of 2021-2027 SG4), EMAS registration (2023-2025 SPD)	EMAS registration, approval of CAAR

Table 1 - Stakeholders' expectations

The needs and expectations of significant stakeholders are identified by established communication and reporting channels, regular dialogues, participation in professional forums and networks, benchmarking, and follow ups on applicable legal requirements.

Following a PESTEL (Political, Economic, Social, Technical, Environmental and Legal actors) analysis in 2024, the following high-level risks and opportunities are those that need to be tackled as a matter of priority to enhance the management system (Table 2):

Area	Finding	Risk / Opportunities
Politics	Many geopolitical tensions in the world	R Policy changes env. priorities and limiting focus to core business;
	New ED to be nominated	R Uncertainty of position on environmental matter;
		O knowledge of EMS processus;
	Endorsement of EUAN charter on Climate neutrality for 2030	R Reputational risk of greenwashing;
		O Synergy to improve, while saving resources;
	European Economic Area specifies exemplarity requirements	O Be an EEA front-runner with EMAS registration;
Economics	New European Parliament and new European Commission (EC)	R No means to implement environmental progress;
	90% of the budget of the agency comes from the EU budget	R Environmental improvement should be approved given;
		O Performed study and improvement action with allocated budget;
Social	Stakes connecting with mobility	R Dissatisfaction of staff due to New EC mission guideline; R Commuting from TLL to other eu-LISA sites needs to use airplane;
		O New greening missions' guidelines to be adopted;
	Environmental improvement with an impact on comfort	R Resistance to change from staff;
		O Improve of environmental communication plan
Technology	Buildings extension	O Implementing a process for building projects to env. aspects are covered
	Environmental aspects not considered yet for new projects lies on Data Centre (DC)	O Apply Green Public procurement strategy and updated environmental business case
	New projects (building/DC/equipment):	R Taking into account environmental regulation before starting project (ICPE, IOTA,...)
Environmental	Climate change may lead to more heat waves	R Making it difficult to reduce the energy consumption needed for cooling the DC
	Natural risks	R For France sites: floods, for Tallinn site: long-term submersion
Legal	New premise in BRU is BREEAM in use certified	O Share good practices with landlord to other sites
	Tertiary decree (FR)	R No achievement of target (-40% in 2030)
		O Perform an energy audit to improve energy performance
	EU GREEN DEAL	R Perform offsetting because carbon neutrality it will be difficult following business needs
	Estonian Environmental Strategy 2030	O Improvement of eu-LISA management system (new rules to be applied in TLL site, best practices for other sites)

Table 2 - PESTEL results

These risks and opportunities were considered in the environmental review, enabling the Agency to set its action priorities accordingly.

4.3. Governance of the EMS

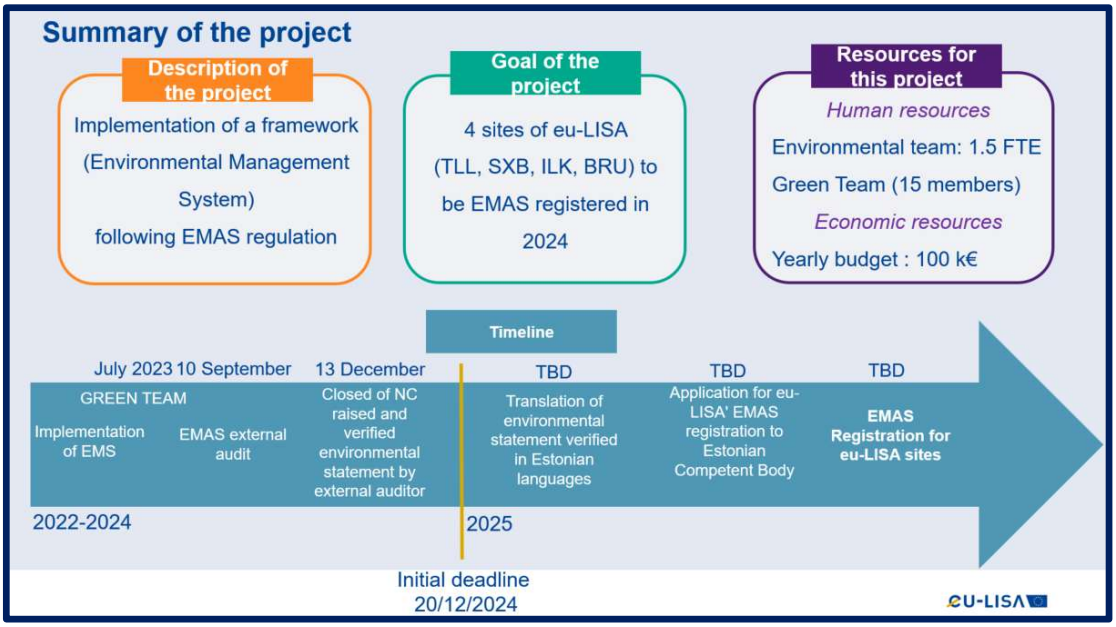
To implement and maintain an efficient environmental management system, eu-LISA adopted the following structure (Table 3):

Role	Key Responsibilities
Executive Director	Approves the Environmental Policy. Has the ultimate responsibility and authority for the preservation of the environment at eu-LISA and compliance with the environmental legal framework applicable to the Agency.
Management Committee	Participates in the annual review of the environmental management system, comments on and validates the annual objectives, targets and KPIs.
Corporate Service Department	Under the Executive Director's management, the Corporate Services Department ('CSD') ensures the implementation and the day-to-day running of the EMS. It provides support to all teams in the implementation and maintenance of the EMS.
Heads of Sector	Ensure the implementation of the annual action plan. Enforce the rules in their respective areas.
Green Team	Volunteers from the whole Agency. Participate in workshops, suggest actions and communicate results to their sector / unit.
Staff and external employees	Apply the rules in their respective area. Share their concerns and ideas for improvement.

Table 3 - Environmental organisation at eu-LISA

In the long-run as sustainability becomes our way-of-life, in the Agency management and Green Team members will be key stakeholders in shifting the gears in our management system.

4.4. Key steps in the implementation and maintenance of EMAS



Starting from 2025, eu-LISA will define a standard annual timeline for the Environmental Management Systems with the main steps being the internal audit, annual review, improvement planning, and external audit.

5. Environmental aspects and impacts

eu-LISA activities have both direct and indirect impacts on the environment. Direct environmental aspects are defined as activities, products and services that affect the environment and over which the organisation has direct management control. Indirect environmental aspects are those activities and services that can, to some degree, be influenced by eu-LISA but not fully controlled.

5.1. Methodology

Aspects are elements of an activity that may or may not have an impact on the environment.

Identification of aspects was carried out through document analysis and interviews with the Green Team members.

To evaluate the significance of an aspect, sets of different criteria were used, depending on whether the aspect is:

- Direct or indirect,
- normal or malfunctioning (abnormal, emergency).

For each aspect, each of the following criteria were rated:

- the nature of negative impacts, by answering “Yes” or “No” to the questions below for each aspect (score = 1 when there is no Y; 2 when 1 or 2 Y; 3 when 3Y and 4 for 4 Y)
    - Are there environmental permit-related requirements specific to that aspect?
    - Direct: High sensitivity of the receiving environment; Indirect: Possibility to influence impacts up-stream with our decisions?
    - High consumption / emissions or tendency to worsen: size, number, frequency and reversibility of the aspect or impact
    - Failure to meet the expectations of ‘manage closely’ stakeholder, including the organisation's employees.

Significant impacts are those with an impact score of 3 or 4.

- The potential to improve “Yes” or “No” to the questions below for each aspect (if political priority = Y and +1 for each Y)

    - Corporate policy or vision supporting or requiring improvement
    - Direct control and best practice available but not yet applied
    - Positive return on improvement actions /ROI (return on investment)

The priority is then given to each aspect and is calculated by the following formula: (nature of negative impacts score) x (potential to improve score).

To ensure a proper allocation of resources in accordance with the need for improvement, significant impacts are those with an impact score of 3 or 4, and priority above 8. These aspects become the focus of the EMS. However, this does not mean that no action can be planned for any other aspects if such measures are easy to resolve and impactful.

The complete results of the analysis are presented in the document **2024 EMAS environmental aspects**.

5.2. Significant environmental aspects and impacts

Process owner	Significant envionmental aspect	Direct (D) /Indirect (I)	Impact
Operational processes-design	Electricity consumption	I	Depletion of non-renewable sources; pollution of water, air; greenhouse effect,
Operational processes-control	Electricity consumption	D	Depletion of non-renewable sources; pollution of water, air; noise; greenhouse effect, X-Ray (ionisation, electromagnetic, wireless
	Generation of hazardous waste	D	Air, water and soil pollution
	Use of raw materials	D	Depletion of non-renewable sources; greenhouse effect
	Waste heat	D	Depletion of non-renewable sources; greenhouse effect
Project management (MDC2)	Use of raw materials	I/D	Depletion of non-renewable sources; greenhouse effect
	Electricity consumption	D	Depletion of non-renewable sources; pollution of water, air; greenhouse effect,
	Generation of hazardous waste	I	Air, water and soil pollution
Facilities	Electricity consumption	D	Depletion of non-renewable sources; pollution of water, air; greenhouse effect,
	Generation of non-hazardous waste	D	Air, water and soil pollution
Procurement (priority market)	Material use (resources and raw materials)	I	Depletion of non-renewable sources; pollution of water, air; greenhouse effect,
Mobility	Air emissions	I	Air pollution; greenhouse effect

Table 4 - Results of the environmental analysis: the main significant aspects

The number of Significant Environmental Aspects 9SEA) increased between 2023 and 2024 mainly because of new project of implementation of new Modular Data Centre 2.1. There are other reasons which are detailed in table 5 below:

Year	2023	2024
SEA	13	19
Modification	Improve methodology (more accurate) Updated of SEA and impact Updated of risk assessment following action implemented, means control, carbon footprint results, incident and new projects (MDC2)	

Table 5 – Comparison of SEA 2023 and SEA 2024

These aspects come under the six commitments set out in the Environmental Policy and therefore are regarded as relevant aspects.

In its comprehensive environmental review in 2024, eu-LISA identified the above significant aspects. These will be reviewed once a year and confirmed during the management review. Specific objectives, key performance indicators and concrete actions are established based on them, on an annual basis.

6. Environmental Policy and objectives

6.1. Environmental Policy

It is designed to provide a framework for setting objectives on reducing the environmental impact. The Environmental Policy contains the main commitments set out below.

eu-LISA

eu-LISA Environmental commitments

eu-LISA environmental policy 2022

By implementing its own Environmental Policy, eu-LISA, commits to allocate human, organisational and financial resources in order to ensure that the EMS runs efficiently, by following the below objectives:

IMPROVING ENERGY EFFICIENCY

eu-LISA has the willingness to improve its energy efficiency by implementing rules and initiatives such as:

- Defining an **energy sobriety action plan**;
- Defining **environmental criteria** for **each project**;
- Using and complying with energy **best practices** when applicable;
- **Monitoring** relevant **KPIs** and defining efficient actions when discrepancies are observed;

COMPLYING WITH RELEVANT REGULATIONS

eu-LISA considers the observance of **applicable European** and **pertinent local** and **internal Regulations** in the environmental area. The EMS ensures the compliance of the Agency's activities by:

- Identifying and **fulfilling legal obligations** and non-legal requirements;
- Ensuring a continuous **regulatory monitoring**;
- **Including** current and **future legal requirements** through ongoing projects.

PRESERVING NATURAL RESSOURCES AND PREVENTING POLLUTION

- Promoting a **digital work** environment;
- Integrating **environmental criteria** within **services providers' contracts**;
- **Operating** in an **environmentally** responsible **way.**

DEVELOPPING ENVIRONMENTAL AWARENESS TRAINING – COMMUNICATION

- **Integrating environmental** management and **culture** into the organization;
- **Raising awareness of all employees and service providers** by providing them with relevant and adequate information, instructions, training and supervision;
- **Involving Senior Management** and **promoting** the **employee consultation** and participation;
- Integrating environmental considerations in all activities and project.

ASSESSING THE ENVIRONMENTAL PERFOR MANCE

eu-LISA's environmental objectives and targets are defined each year and the performance is assessed through an annual management review, beginning of Q2. The environmental performance assessment shall include:

- **Monitoring** the **environmental impacts**, **risks** and **opportunities** of eu-LISA's activities by updating the environmental review and conducting inhouse environmental audits in a yearly way;
- Considering **stakeholders expectations** in a relevant action plan;
- Considering the **priorities**, the past years achievements and the **available resources** to build the **new action plan** for the coming year, according to the environmental commitments and new objectives **validated by the Management Committee**.

Ref. Ares(2023)781642 - 02/02/2023

6.2. Objectives for 2024

Based on the Environmental Policy, significant environmental aspects, the greenhouse gas emissions' calculation, and risks and opportunities, the following objectives were set in 2024.

Table 6 below summarizes the key objectives and targets that will be prioritized in 2024

Aspect		2024	Responsible Sector/Team	Achievement
Energy	E.1	Use of 100% green electricity for all premises	GESS (Facilities)	50% (SXB, TLL)
	E.2	Identify three best practices for green data centres (DCs) that could be implemented, and then define the actions to implement them	Operations	20%
	E.3	Improve the calculation of the PUE for the DC in using 100% data from PDU, submetering or electrical consumption record	GESS (Facilities)	80%
Carbon Footprint	C.1	Improve 100% of the data collection to have a more precise Carbon Footprint calculation	GESS (EHS Team)	100%
Procurement	P.1	Train 80% of the entire procurement staff (including operational stakeholders OIA and OVA), giving practical knowledge on Green Public Procurement (GPP) (basics).	HRU (Talent Management Team)	0% (validation of GPP strategy before)
	P.2	For future tenders, if GPP guidelines already exist for their category, start training for 80% of relevant staff members on GPP so that it is implemented in the tenders	GESS (EHS Team)	0%
Awareness	A.1	Start training 50% of managers on EMAS requirements	HRU (Talent Management Team)	100%
	A.2	Provide an awareness session on EMAS and eu-LISA's Environmental Policy to 100% of newcomers	HRU (Talent Management Team)	50%
Projects	J.1	Update project templates to include an evaluation of the environmental impact of each new IT and facilities projects	GESS (EHS Team), Operations	80%
Waste	W.1	Set up selective for 100% of sorting waste in ILK	GESS (EHS Team, Facilities)	100%
	W.2	Collect accurate data for 100% of selective waste sorting in TLL (kg/year/type of waste)	GESS (Facilities)	100%
	W.3	100% of furniture and IT equipment, if still usable, are decommissioned in a sustainable manner	GESS (Logistics), ICT	100%
Travel	T.1	Include specifications on an electric alternative for the next tender procedure for the shuttle service between SXB & ILK	GESS (Logistics)	Cancelled
	T.2	Implement a transport policy in eu-LISA for all sites	HRU	0%
	T.3	Apply the European Commission missions' guidelines for all sites	GESS (missions)	100%

Table 6 - 2024 Environmental Objectives

In 2024, environmental objectives are achieved at 58 %. As these objectives have an important impact on EMS, it will be maintained for 2025 in implementing corrective action to achieve fully objectives mentioned above.

6.3. Objectives for 2025

Based on the Environmental Policy, significant environmental aspects, the greenhouse gas emissions' calculation, and risks and opportunities, the following objectives were set in 2025.

Aspect	Objectives	Target
Energy consumption	Improving energy performance of building and data centre	-2% MWh/m² (Tertiary offices buiding)
		Inferior to 1.3 PUE (for new DC)
		Inferior to 1.7 PUE (current DC)
Procurement	Green electricity (BRU-Aspire, ILK)	100%
	Applying Green Public Procurement strategy	100%
Waste	Preventing, sorting, recycling waste	For all sites 90% of recovery waste
Raw material	Preserving natural resources in using circular economy	60% material recovery 60% Furniture 60% ICT
Air emission	Using eu-LISA Greening rules for missions and authorized travels Reduction to reduce CO2 emission	80% of number of missions which respects eu-LISA greening rules
Air emission	Promoting sustainable mobility	One awareness session by year
All	Improving environmental culture in providing environmental awareness at all levels of the organisation	Three awareness session on environmental aspect by year

Table 7 - 2025 Environmental Objectives

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7. Actions and performance

The following sections report on the eu-LISA performance over in its relatively short history, and a comparison of 2024 toward 2023, which the yearly basis, is presented.

The variations in environmental indicators observed in 2024 compared to 2023 are primarily driven by changes in infrastructure, equipment usage, and external factors such as weather conditions and data availability.

Overall, while some indicators increased due to operational expansions and improved data collection, eu-LISA continues to implement measures to optimize energy efficiency, reduce waste, and lower its carbon footprint.

Note 1: the new administrative site located in Strasbourg Aspire, was still in construction during the last quarter 2024 and it was unoccupied in 2024, consequently, the environmental performance doesn't consider.

Note 2: in the Brussels site, eu-LISA office is located in a rented building shared with others EU-Agencies. The liaison office moved to new building located in on 23rd April 2025. The Agency will occupy a complete floor and it will be possible to better assess and follow the environmental impact of its activities. Nevertheless, to have a global and approximate view of its current environmental performance, a calculation based on hypothesis was done for this Brussels site. A ratio of 0.22 was applied for the global energy consumption at the site. This ratio corresponds to the area occupied by eu-LISA in the shared office in Brussels, and the regulatory requirements for each workstation

Note 3: As teleworking policy is applied and to be closed to real situation in term of occupancy, a coefficient of 0.8 is used for employee number, regarding calculation of environmental performance.

Note 4: In 2024, in accordance with the Sectoral Reference Document for Public Administration only three indicators have been chosen, for water, waste and paper consumptions, which are more relevant regarding current environmental management system e feu-LISA.

Note 5: In 2024, environmental performance indicators recommended by the telecommunication and information and communication technologies (ICT) services sector have not fully been considered. Indeed, we need first working on having an accurate PUE value before using indicators from the Sectoral Reference Document accordingly.

7.1. Energy efficiency in buildings

In 2024, at our headquarter in Tallinn, Estonia, a new energy performance tool driven by Artificial Intelligence was implemented to optimise electricity and heating consumption, in April 2024. This tool enables to optimize HVAC system following external parameters (temperature, air quality). An audit of energy saving solution was also finalized in March 2024, which identified high energy consumers usage and proposed improvement actions. Following energy saving solutions proposed, one quick win actions were implemented: improvement of the existing automation system and equipment operating modes of the HVAC systems.

The energy consumption for all sites, with overall and specific data, for 2023-2024 are presented below:

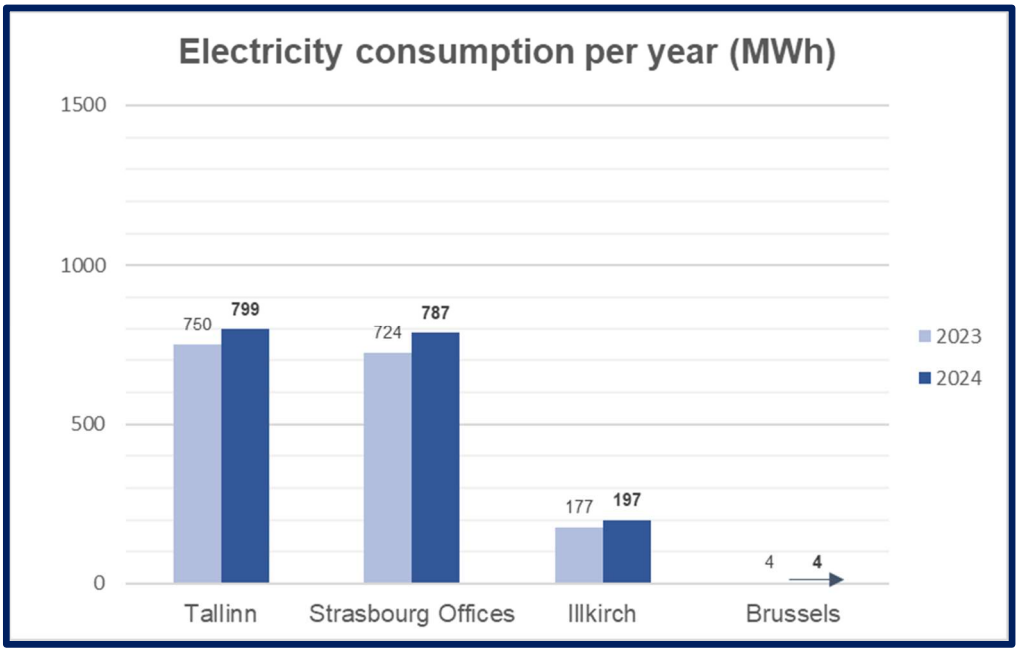


Figure 1- Electricity consumption for offices per site

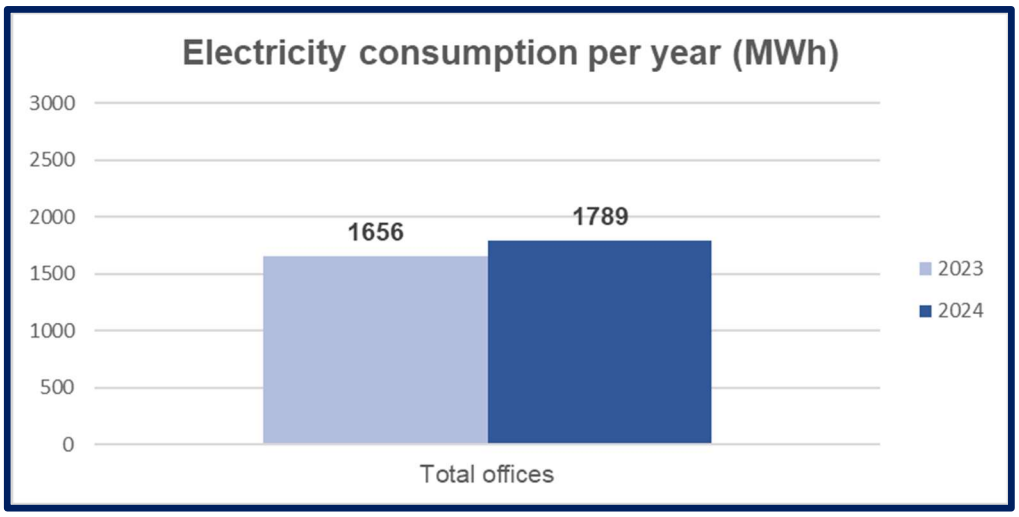


Figure 2 - Global energy consumption for offices and for all sites

Tallinn site: The consumption rose by 6.5% due to the addition of IT equipment's in server rooms, increased cooling requirements, and higher usage of EV chargers as the number of electric vehicles increased.

Strasbourg Site: The electricity consumption increased by 9.0% due to the installation of new humidifiers, a dehumidifier, a power inverter, a mobile cooling unit, and a vending machine, as well as energy demand from the construction of the Modular Data Centre 2.1, which began in October 2024.

The “SXB office” data does not include one old, containerised building which has no meters to provide accurate data. The consumption of this building is for now aggregated with the DC consumption, even if its electricity consumption is insignificant compared to the electricity consumption of the DC. The objective is to implement solutions to accurately measure the consumption of this building independently in the future.

Illkirch-Graffenstaden site: saw an 11.3% rise, attributed to increased EV charger use and a colder climate, reflected in a 16% increase in heating-degree days.

Brussels site: as the office space is shared, the_data are estimated and show a stagnated electricity consumption between 2023 and 2024.

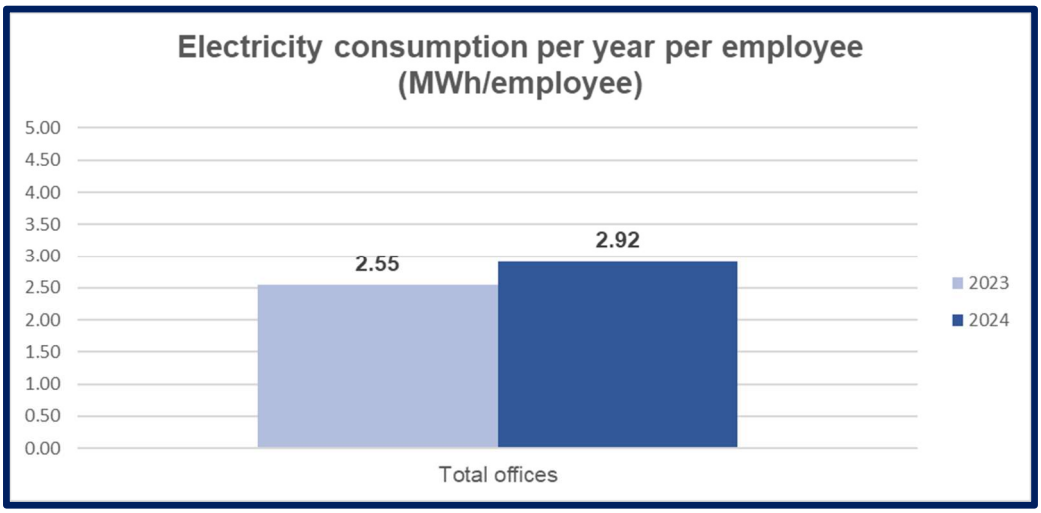


Figure 3 - Electricity consumption for office per employee, and per year

The electricity consumption in 2024 increased overall by 14.5%, mainly due to the implementation of new equipment and operational changes across eu-LISA sites.

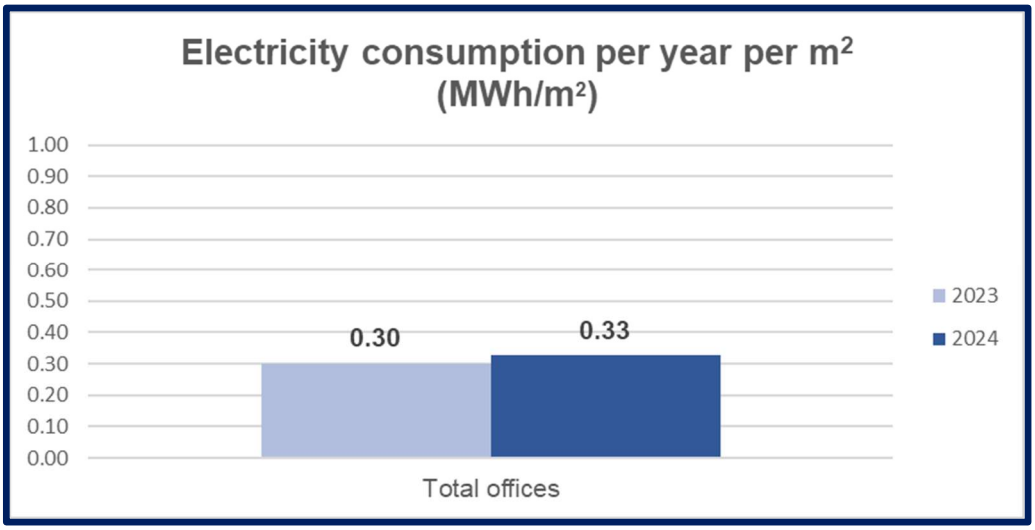


Figure 4 - Electricity consumption for office per m², and per year

In analysing the electricity consumption per m² and per site, the results are quite similar and can be explained by the explanation mentioned above.

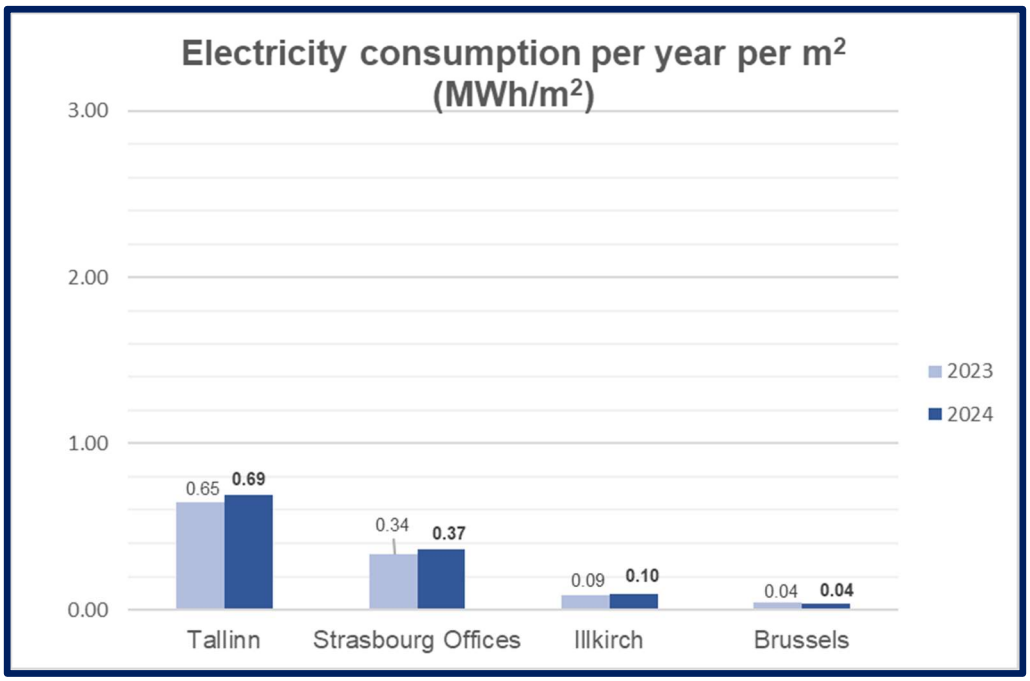


Figure 5 - Electricity consumption for office in buildings, by site and per m²

In analysing the electricity consumption per employee and per site, the results are quite similar for Tallin and Strasbourg offices sites, to the global data on electricity consumption. The exception to this is the Brussels site, where the ratio is the same between 2023 and 2024.

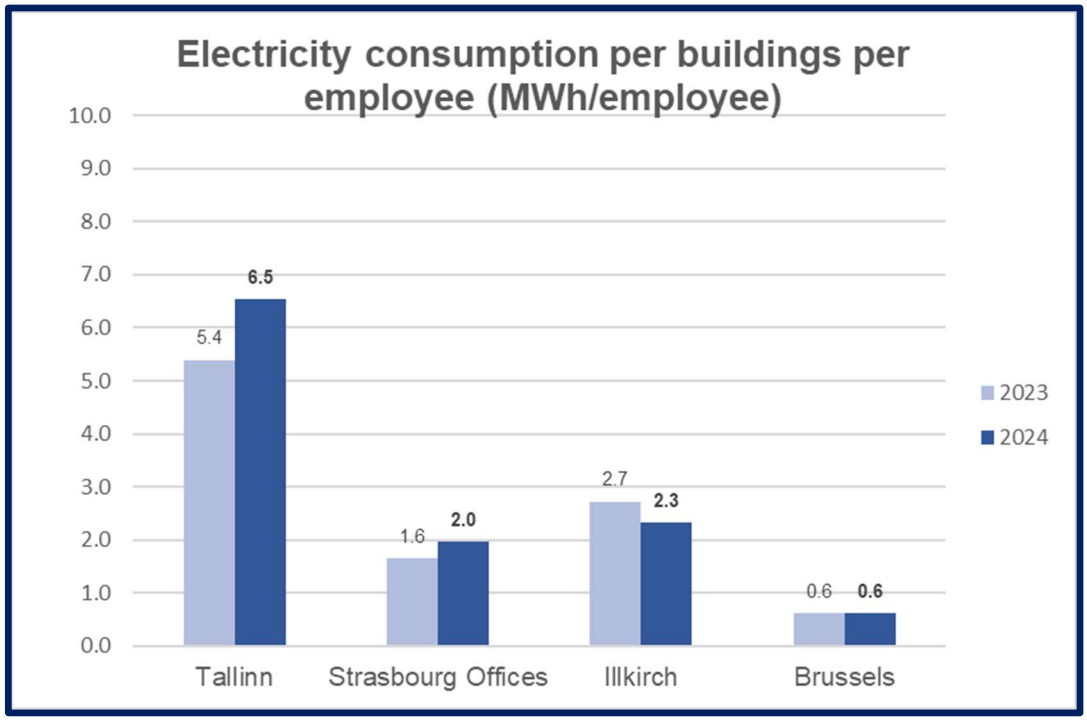


Figure 6 - Electricity consumption for office in buildings per site and employee

7.2. Energy efficiency in the Data Centre

The data centre recorded a 7.7% increase in consumption, mainly due to expanded server usage.

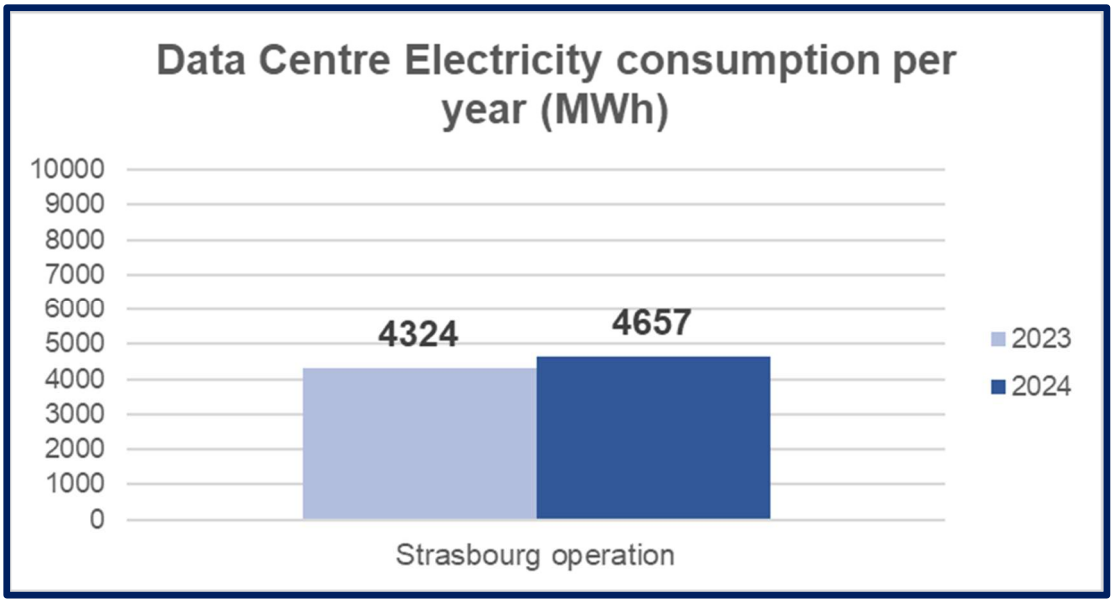


Figure 7- Data Centre Electricity consumption per year (MWh)

In the coming years, the activity of the Data Centre will continue to increase. The electricity consumption of the Data Centre is then not a stable indicator. For that reason, the PUE will be used to monitor the energy efficiency of the Data Centre. PUE = Power Usage Efficiency

PUE

PUE serves as a benchmark for efficiency, comparing a data centre's infrastructure to its existing IT load. The initial assessment of PUE provides an efficiency score and establishes a testing framework for the facility to replicate.

By comparing the initial and subsequent scores, Data Centre managers can assess the effectiveness of ongoing efficiency initiatives. They evaluate the power consumed by the IT equipment required by an organisation against the power used by the infrastructure responsible for cooling, powering, backing up, and safeguarding that IT equipment.

PUE = Total Facility Power / IT Equipment Power

PUE	Level of Efficiency
3.0	Very Inefficient
2.5	Inefficient
2.0	Average
1.5	Efficient
1.2	Very Efficient

Table 8 – Level of PUE efficiency

PUE is an internal calculation with a ratio between electrical sub-metering directly taken by the Facility Management sub-contractor, the first business day of month. Therefore, the PUE value represents an instant photograph of the consumption. This indicator enables us to track a trend but does not provide accurate dates.

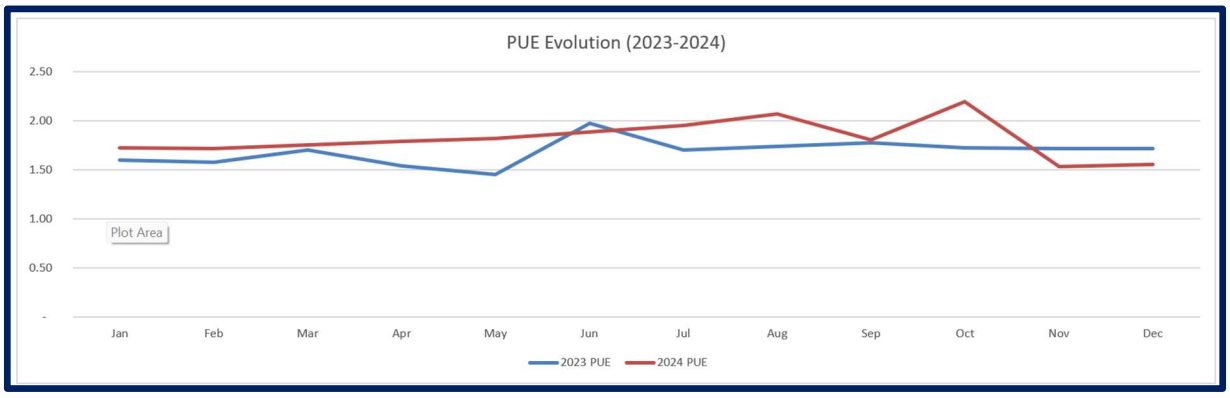


Figure 8 - PUE evolution of Strasbourg main DC

The trend of PUE value decrease at the end of 2024's year main decrease because of removing of cable in ceiling.

eu-LISA has already initiated certain measures (outlined below) to enhance the performance of the main Data Centre, but additional actions will need to be implemented in the near future.

- Transitioning the water tank to a three-point mode to prevent the mixing of cold and hot water.
- Relocating temperature sensors for the chillers to optimise the use of free cooling.

Action	Status	Expected Date
Implementation of Sub-metering to measure an accurate PUE value	Not started	Q4 2025
Phase 1 - Short term quick wins – Improve energy performance (e.g. realise the Hot/Cold Aisle Containment) in the DC building	In Progress. There are dependencies and constraints due to impacts on operational activities.	Q4 2025
Phase - 2 Implementation of Geothermal Energy to improve the DC energy performance and cooling availability (1 Well)	A study in Progress.	2026

Table 9 – Action plan to enhance the DC performance

The main expected benefits are:

- Energy gain: 5-7% reduction in PUE.
- Environmental gain (lowering of carbon impact).
- Increased system availability (minimum 80°minutes of additional availability in the event that the chillers stop operating).
- Gain in available cooling power (additional available cooling power of up to 577 kW).

In 2024, the goal is to perform an analysis of best practices for enhancing energy efficiency in Data Centres. The findings of this analysis will assist the Agency in determining the initial focus area to maximise impact. If necessary, the Agency may seek assistance from a consultancy provider to evaluate the benefits and costs associated with each solution, thereby prioritising actions effectively.

For operations in Tallinn, in addition to electricity consumption, district heating is in use. There is no district heating used for SXB and ILK sites.

For district heating consumption, the trend decreased between 2023 and 2024 for global consumption and by employee.

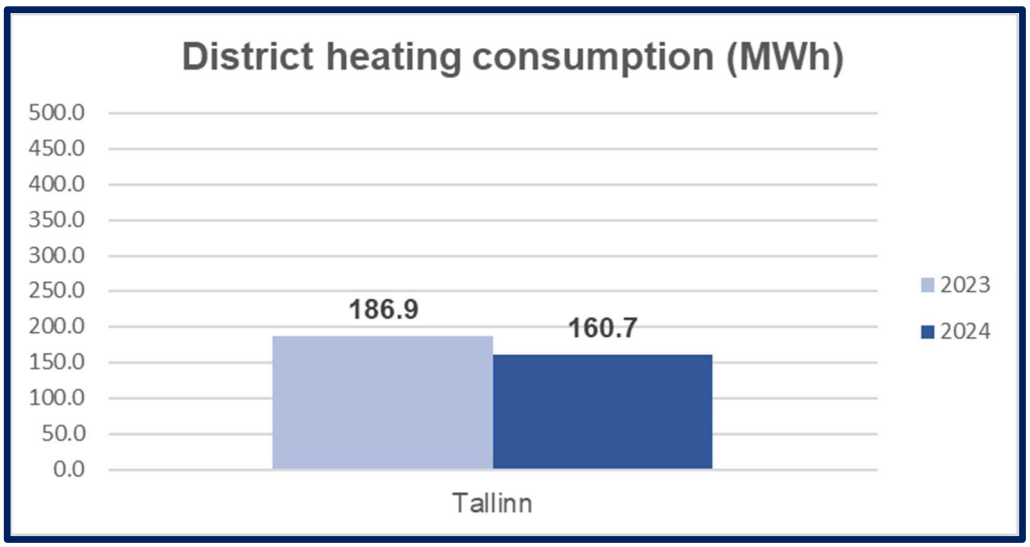


Figure 9 – District heating consumption (MWh)

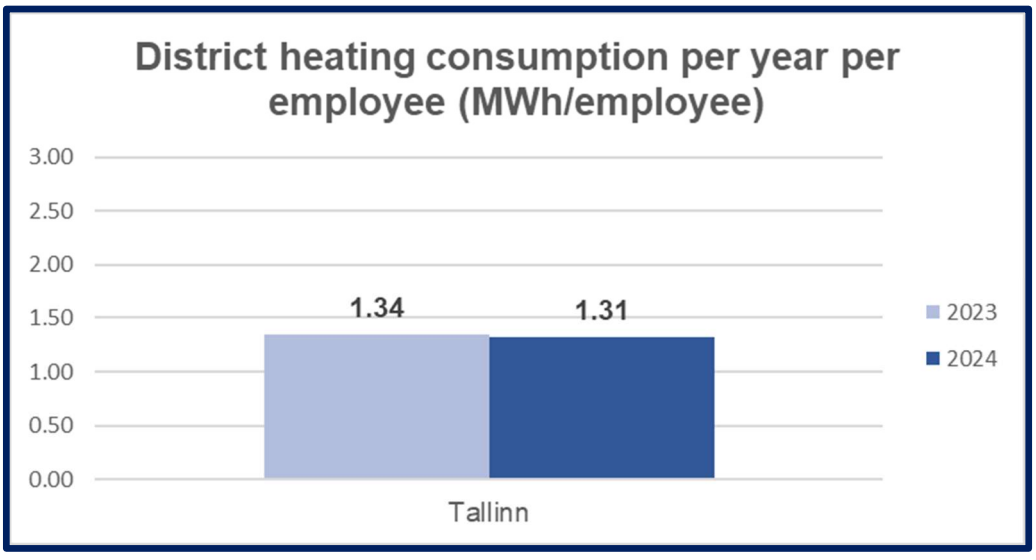


Figure 10 – District heating consumption per year per employee (MWh/employee)

The ratio of district heating to area, decreased between 2023 and 2024.

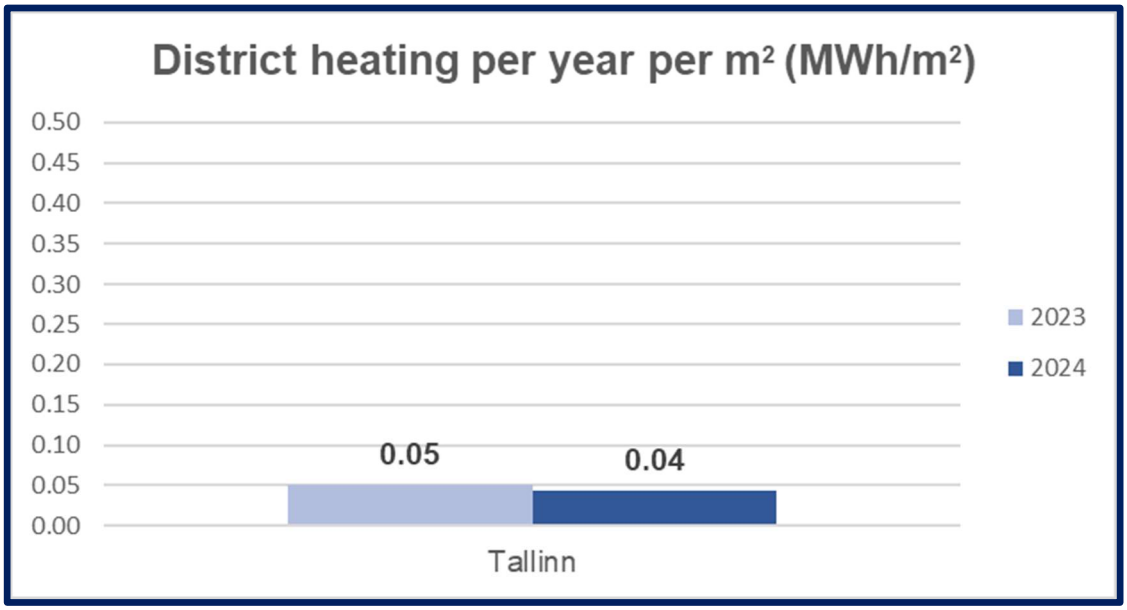


Figure 11 – District heating consumption per year per area (MWh/m²)

Heating consumption showed a mixed trend, with district heating at the Tallinn site decreasing by 14% due to a 9% reduction in heating-degree days and the improved efficiency of a heat exchanger system in the server rooms.

7.3. Gas consumption

For Brussels, the gas consumption and relevant ratio increased between 2023 and 2024 because of weather condition.

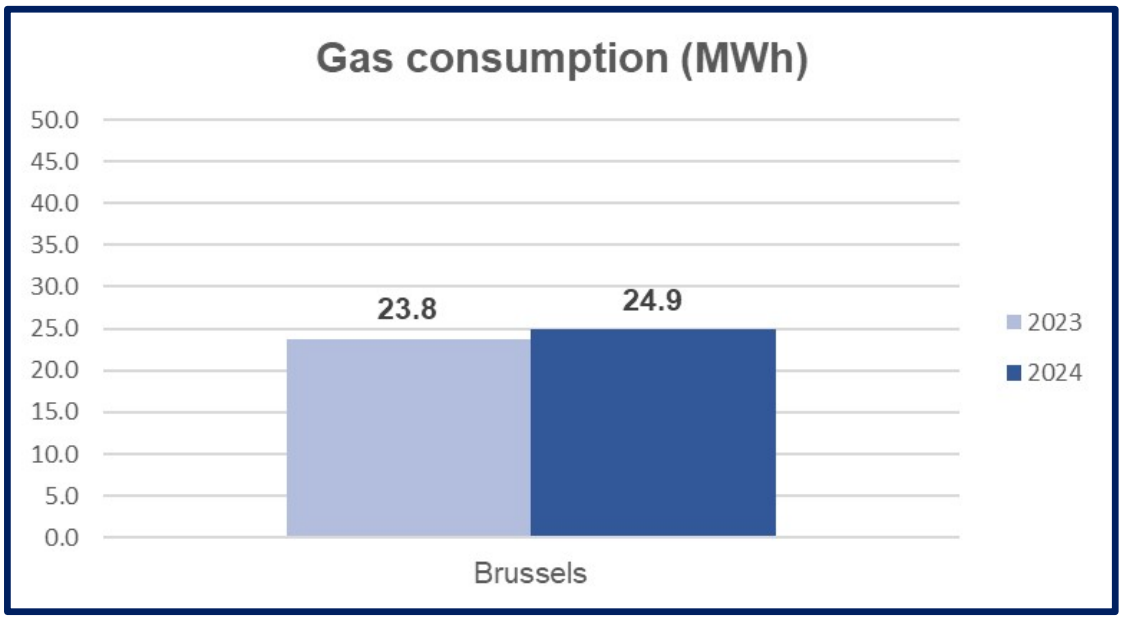


Figure 12 – Gas consumption per year (MWh)

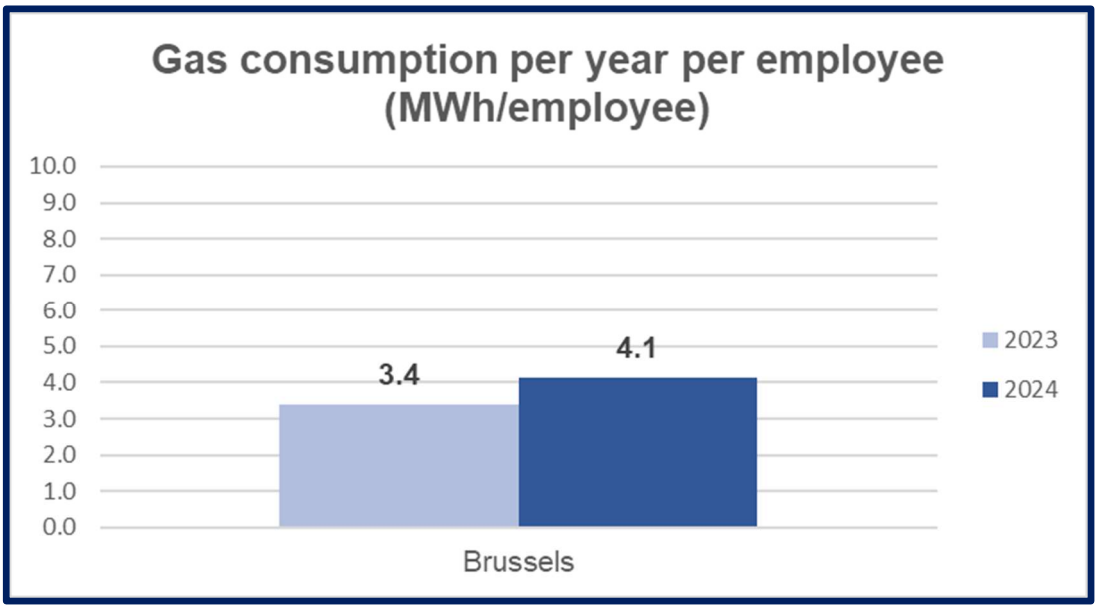


Figure 13 – Gas consumption per year per employee (MWh/employee)

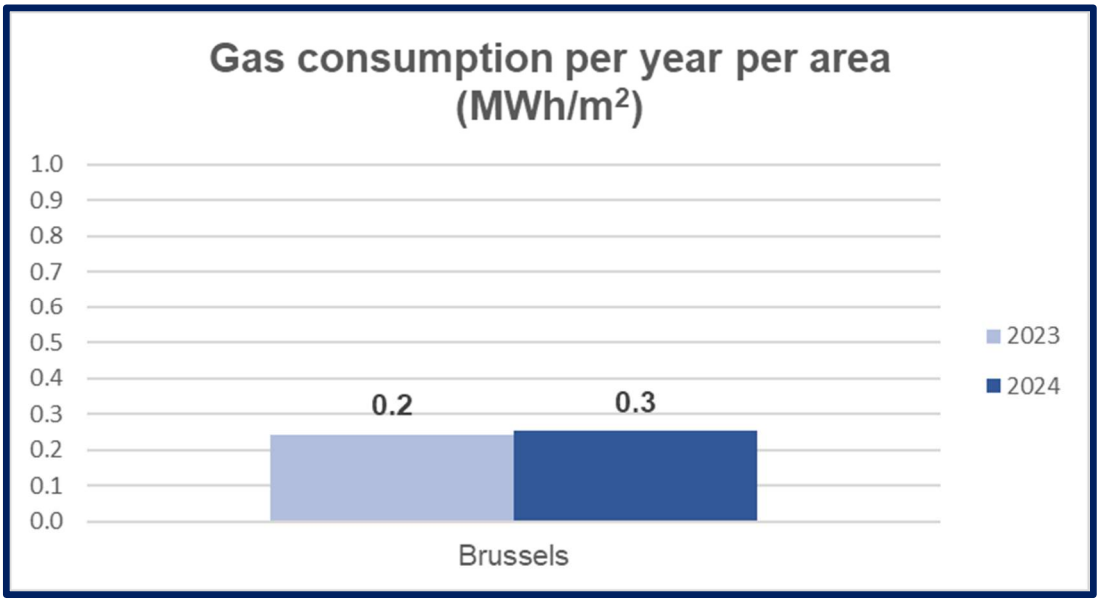


Figure 14 – Gas consumption per year per area (MWh/m^2)

7.4. Global energy consumption

At eu-LISA, different sources of energy are used such as electricity, district heating or gas most of which come from renewable energy supply. Moreover, for TLL and SXB sites, a specific “green “contract regarding electricity are purchased in order to have a warranty that electricity consumption from renewable origin equivalent to electricity consumption from eu-LISA’s activities, is injected into the network, by means of guarantee of origin certificate.

See details in Table 10 below:

Sites	Source of energy	Kind of energy	Details
TLL	Electricity	Renewable	Green certificate (100%)
	District heating	Renewable	Wood chips (49.40%), Waste heat from incineration of municipal waste (18.05%), Renewable electricity (1.50%);
		Non-renewable	Natural gas (30.80%), Landfill gas (0.03%), Light fuel oil (0.05%); waste heat (0.17%);
SXB	Electricity	Renewable	Green certificate (100%)
ILK	Electricity	Non-renewable and renewable	Renewable (4.7%), fossil (8.8%), nuclear (86.5%)
BXL	Electricity	Non-renewable	No data available
	Gas	Non-Renewable	No data available

Table 10-Details of energy supply

The global renewable energy consumption of the Agency represents 97.3 %. See details in figures below:

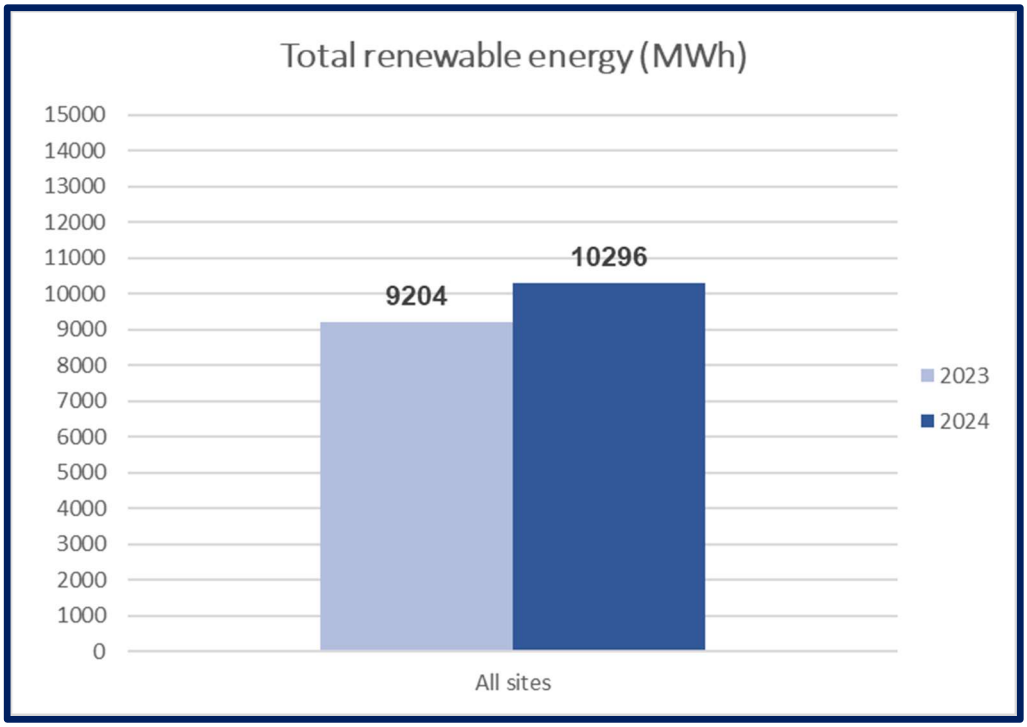


Figure 15 - Total renewable energy consumption per year (MWh)

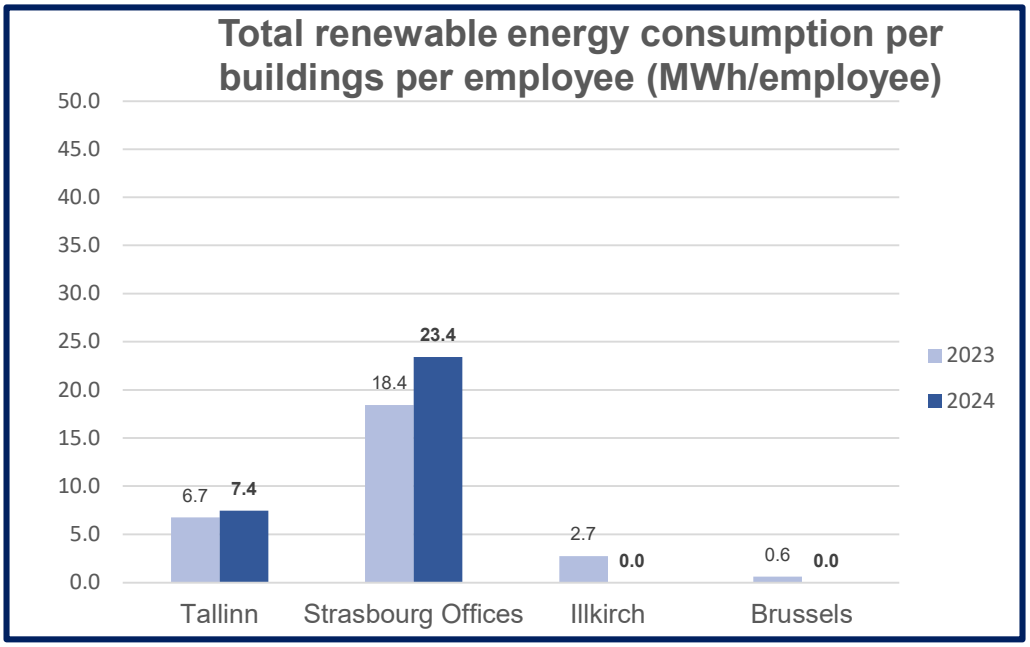


Figure 16- Total renewable energy consumption per site and per employee

It remains 2.7% for non-renewable energy which concerns gas consumption for heating space rented for the Liaison office located in Brussels and electricity for the Liaison office as well and the Ilkirch-Graffenstaden site.

District heating in Tallinn site contains 31% of non-renewable sources:

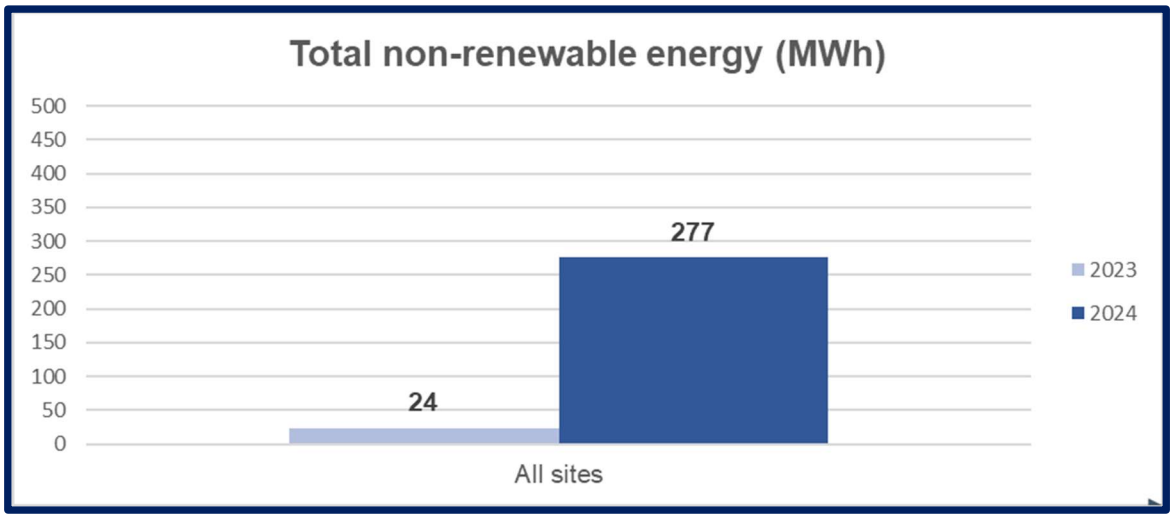


Figure 17 - Total non-renewable energy consumption per year (MWh)

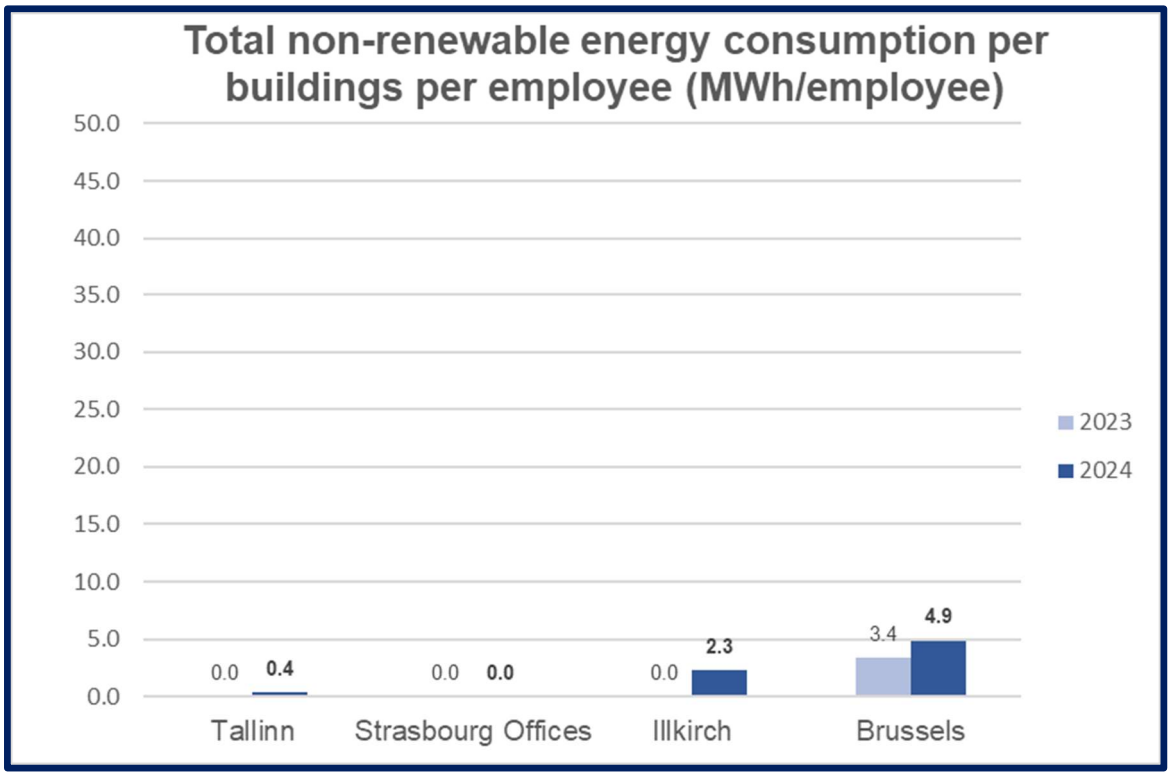


Figure 18- Total non-renewable energy consumption per site and per employee

7.5. Waste

The eu-LISA activities produce waste at each site, in different volumes. Waste management is not harmonised across the sites and not all waste production data are currently available due to different factors on each site. More details are in Table 11:

Site	Kind of wastes	Providers	Data
TLL	Paper-Cardboard, household waste, biowaste, electrical and electronic devices (W3E),	City service providers	Accurate data
SXB	wood, glass, paper-cardboard, electrical and electronic devices (W3E), Battery	Sub-contractors	Accurate data
	Recyclable mixed waste (paper, plastic, glass, metal from food packaging) household waste,	City service providers	Accurate data
ILK	Recyclable mixed waste (paper, plastic, glass, metal from food packaging) household waste	City service providers	Based on estimation
BXL	Recyclable mixed waste (paper, plastic, glass, metal from food packaging) household waste	City service providers	Based on estimation

Table 11-Detailed data on waste generated by site

In the office waste is segregated into recyclable and non-recyclable categories, with an emphasis on increasing recycling rates within the office environment.

While these measures help to reduce waste, the Agency is continuously exploring new opportunities to minimize its environmental impact in this area. Future initiatives will focus on further optimizing waste management practices and adopting circular economy principles in line with the EU's sustainability goals.

For Tallinn, the service providers in Estonia provide information regarding the weight of waste collected, on monthly basis.

In Brussels, the premises are shared with another agency, and waste is collected at the same time by the city which cannot track the quantity generated. In 2025, the Liaison Office will move to another building where it will be possible to collect accurate data.

In Illkirch-Graffenstaden, the waste is collected by the city service provider, which does not furnish data regarding the quantity of waste collected as the waste of multiple buildings in the Parc d'Innovation are mixed.

For the Strasbourg site, part of the waste is collected by an external service provider, while the remainder, classified as domestic waste and recyclable mixed waste, is collected by the city service provider.

Given these circumstances, and to calculate approximate data by waste and by site, we apply the following hypotheses to the missing data:

Illkirch-Graffenstaden and Brussels sites

An internal calculation was done using data from the Strasbourg site and by applying a weighting factor for each employee. This approach enables us to have a global view of the generated waste and to focus our efforts on implementing a process of scaling in the sites which produce more than 10% of the overall waste for all sites.

In Table 12 the data are given on waste generated at each site in 2024.

2024	SXB	ILK	TLL	BRU
Non-Hazardous waste (T)				
Metal	0.00		0.00	
Wood	1.79			
Glass	0.15		0.00	
Paper/Carboard	0.29		1.65	0.00
Mix waste	3.42			
Recyclable mix waste	7.06	1.48	0.00	0.11
Green waste	0.00			
Household waste	11.44	2.40	6.93	0.17
Biowaste			1.68	
Hazardous waste (T)				
W3E (hazardous waste)	6.84		1.32	
Battery	0.05		0.00	
Total	31.0	3.9	11.58	0.3
% Waste/total	66%	8%	25%	1%
Non-hazardous waste	77.8%	100%	88.6%	100%
Hazardous waste	22.20%	0.00%	11.40%	0.00%
Employee	401	84	122	6
Waste/employee (kg/employee)	77	46	95	47

Table 12 -Total waste production in 2024 per eu-LISA site (estimate for ILK and BRU sites)

In 2024, waste generation per employee decreased significantly by 56%, primarily due to a reduction in cardboard waste and improved data accuracy for mixed and household waste at the Strasbourg site, where 2023 figures had been estimated due to data limitations.

The data on non-hazardous waste and hazardous waste are represented in Figures 19 and 20 below:

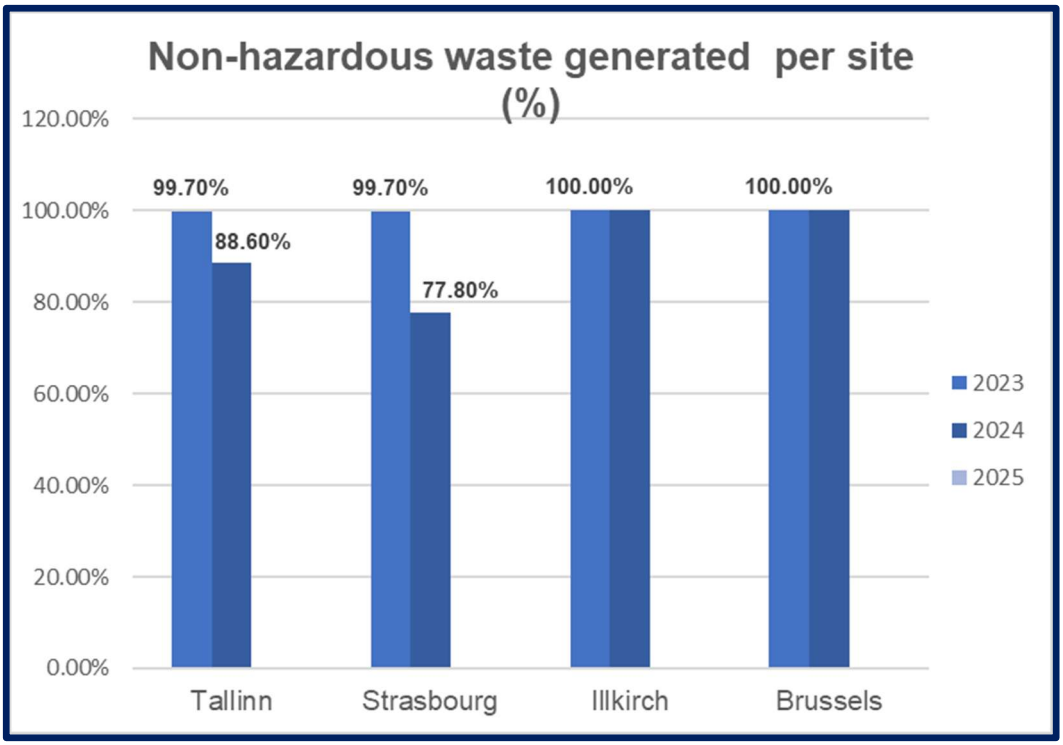


Figure 19 – Non-hazardous waste generated per site (%)

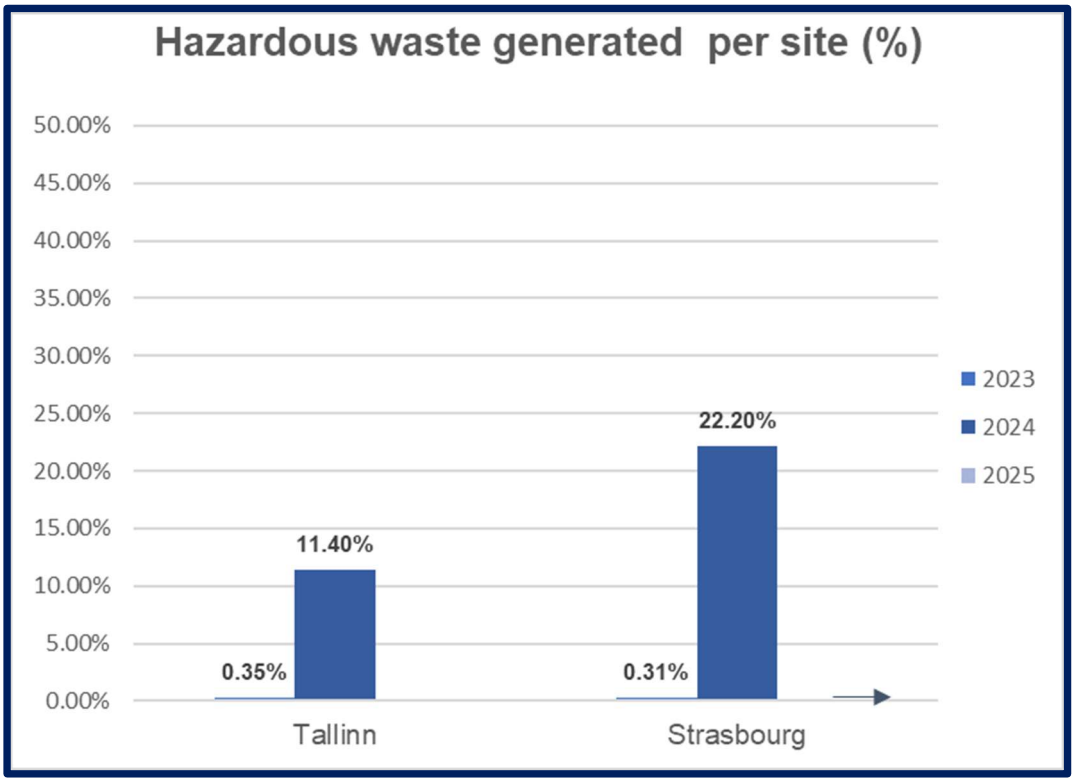


Figure 20 – Hazardous waste generated per site (%)

Regarding these results, for the Strasbourg site, the waste generated by employee per year is 77 kg/employee/year, and for Illkirch-Graffenstaden it is 46 kg/ employee/year. For the Tallinn and Brussels sites, the waste generated by employee per year is respectively 95 kg/employee/year and 47 kg/employee/year. These results are below the sectoral reference data (200 kg/FTE/year).

In 2024 a waste management project was initiated for encompassing various actions such as developing better methods to estimate the volume of waste generated by individual buildings, enhancing waste-sorting practices, improving waste are, and strengthening communication on related issues to all employees.

7.6. Water

The water is provided by the municipalities for use at the premises (sanitary facilities and kitchens) and is used in the Strasbourg site for the Data Centre Cooling System.

In 2024, the global water consumption was 3 071 m^3. Water consumption data for Tallinn, Strasbourg and Illkirch-Graffenstaden come from the meter-readings. For the Brussels site, the water consumption data are approximate based on invoices and the number of employees.

In 2024, water consumption per employee increased for Strasbourg and Illkirch-Graffenstaden sites. This rise may be attributed to operational changes (works MDC2.1) and higher occupancy rates at various sites.

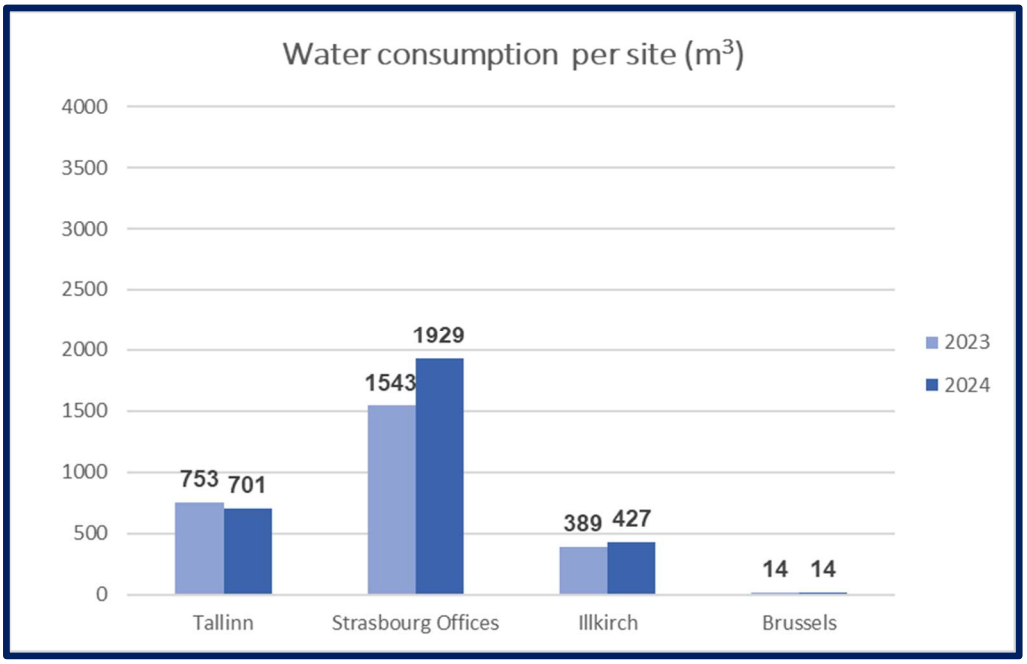


Figure 21 – Annual water consumption per site

The water consumption at eu-LISA per employee per year is 5.0 m^3 which is below the sectoral reference data (6.4 m^3/FTE), taking into account that in the calculation we have included the water used for cooling the Data Centre.

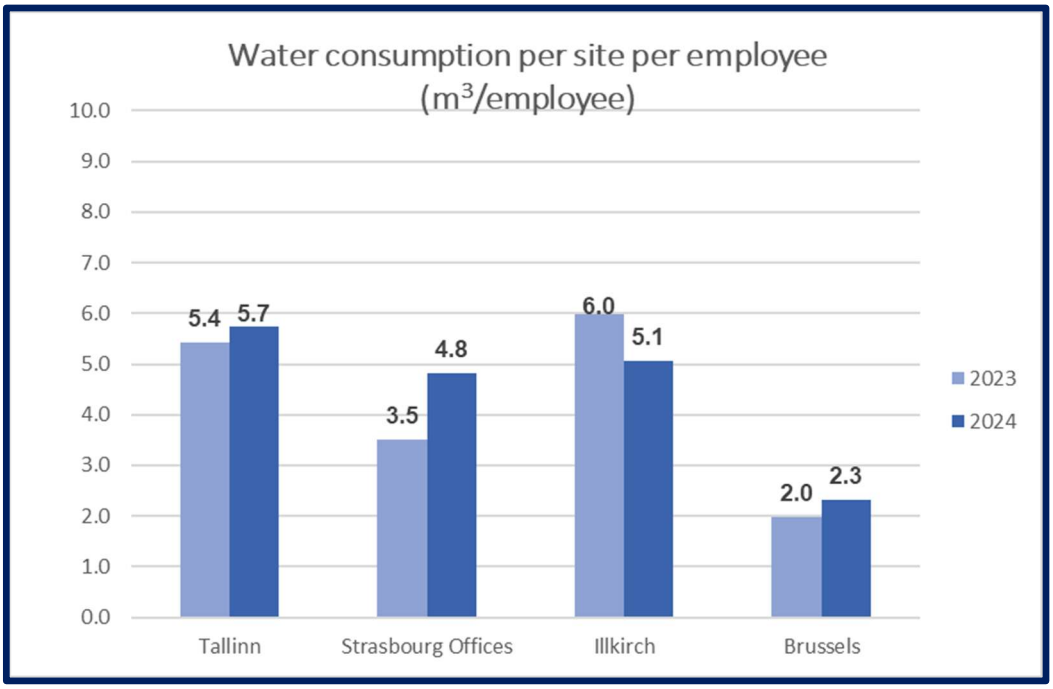


Figure 22 – Annual water consumption per site per employee

7.7. Material efficiency: paper

In 2024, the material efficiency data takes into account only paper consumption.

The paper consumption quantity is calculated each year for all sites. These data are presented in the graph in Figure 23.

By default, the printers in all sites are configured to print on both sides, in white and black.

Based on the 2024 results, a target will be established for the upcoming years. The objective is to raise awareness among all employees about the rise in consumption, with the aim of decreasing the amount of paper used within the Agency.

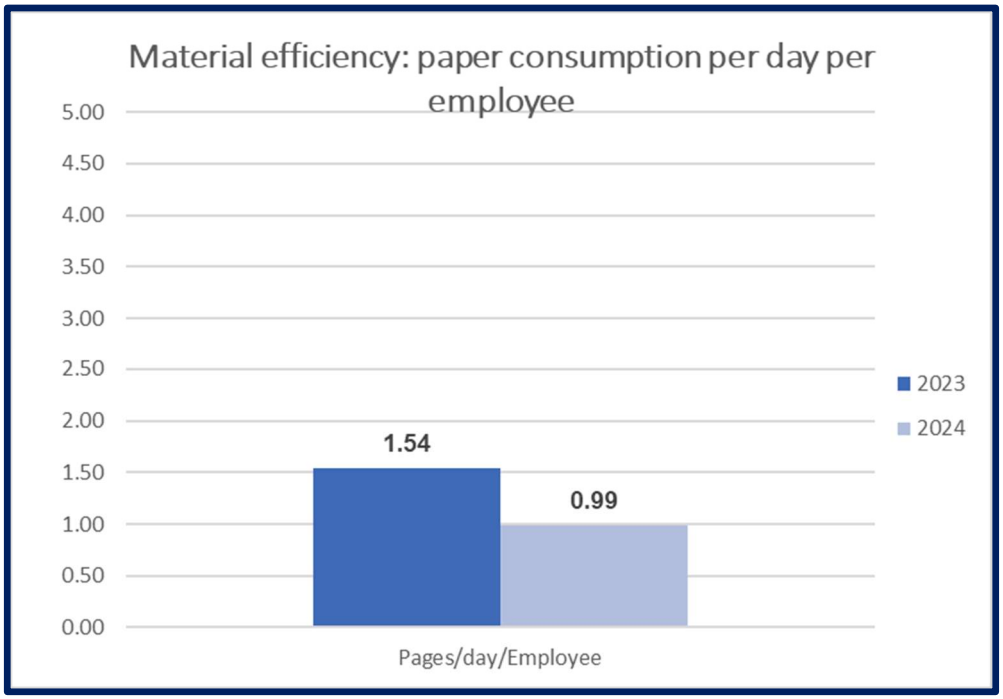


Figure 23 – Material efficiency: paper consumption per day per employee

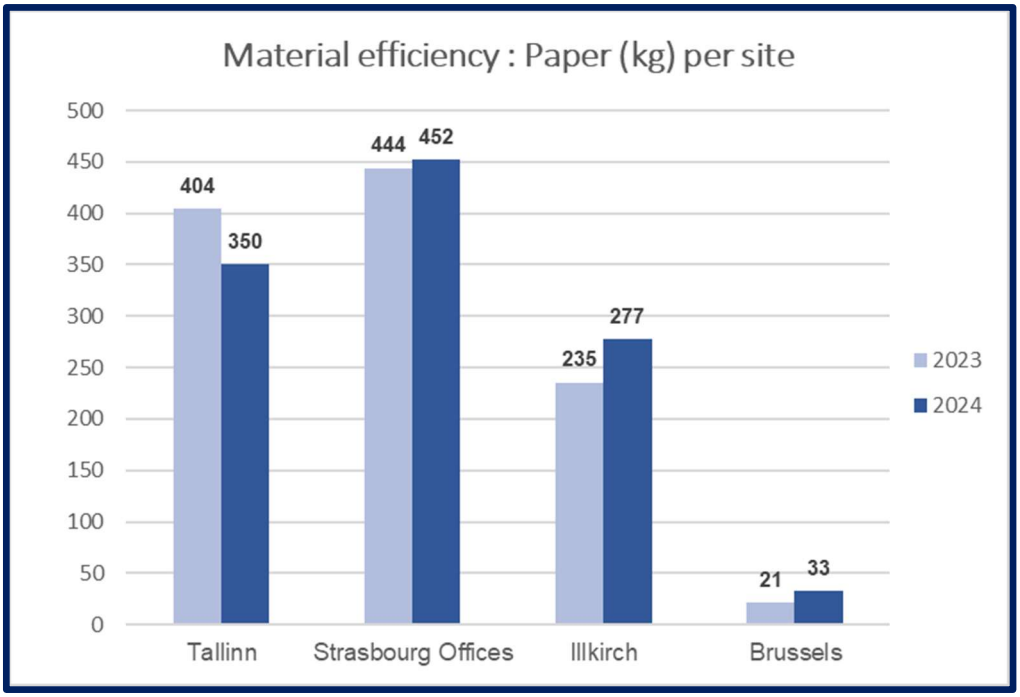


Figure 24 – Material efficiency: paper consumption (kg) per site

In accordance with the Sectoral Reference Document for Public Administration, eu-LISA's paper consumption falls below the benchmark of 15 paper sheets per FTE per day.

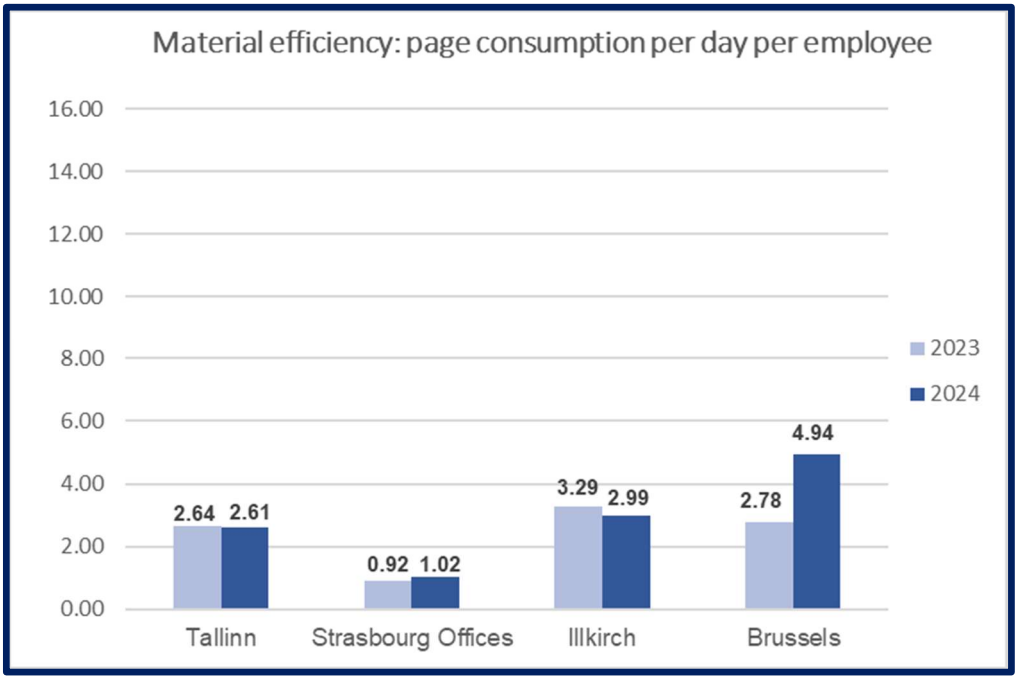


Figure 25 – Material efficiency: paper consumption per site per day per employee

In 2025, the material efficiency performance will be enhanced by adding quantity (kg) of IT equipment implemented during the year.

7.8. Travel emissions

The Agency uses the MIPS+ tool to organise and book business travel for staff. The tool gives the possibility to estimate the carbon footprint of all Staff travel.

In Table 13 the number of travel emissions and related CO_2 emissions are shown for 2023-2024 for all sites. The total CO_2 emissions for the entire year 2024 was 134 tons that is 54% lower than in 2023 (294 tons).

	2023	2024
Estonia	173	66
France	114	58
Belgium	7	10
TOTAL	**294**	**134**

Table 13 - CO_2 emissions in tons related to travel emissions

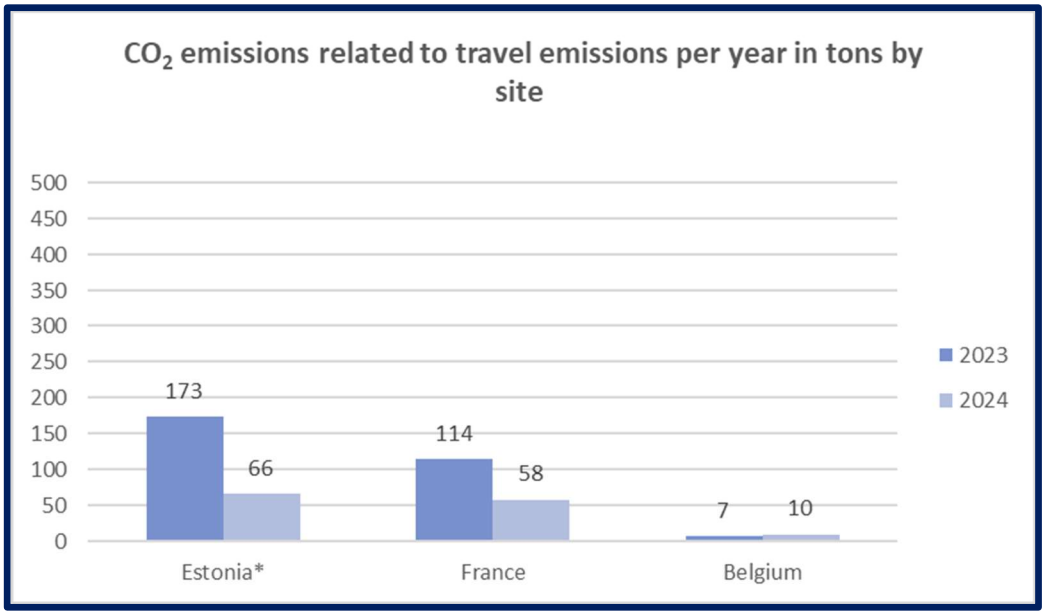


Figure 26 - CO_2 emissions related to travel emissions per year in tons

eu-LISA found it interesting to analyse its Carbon Footprint emission by type of transport (Figure 27).

In 2024, while air travel remained common, there was a notable increase in the use of train and bus transportation. The high use of air travel is attributed to the remote location of the headquarters and operational site from the European institutions in Brussels and Strasbourg.

Consequently, to reduce carbon the eu-LISA footprint, leverage actions will be introduced to reduce the number of travel emissions (Figure 26) but not to restrict the transport mode, as the headquarters site is and has to be accessible by airplane.

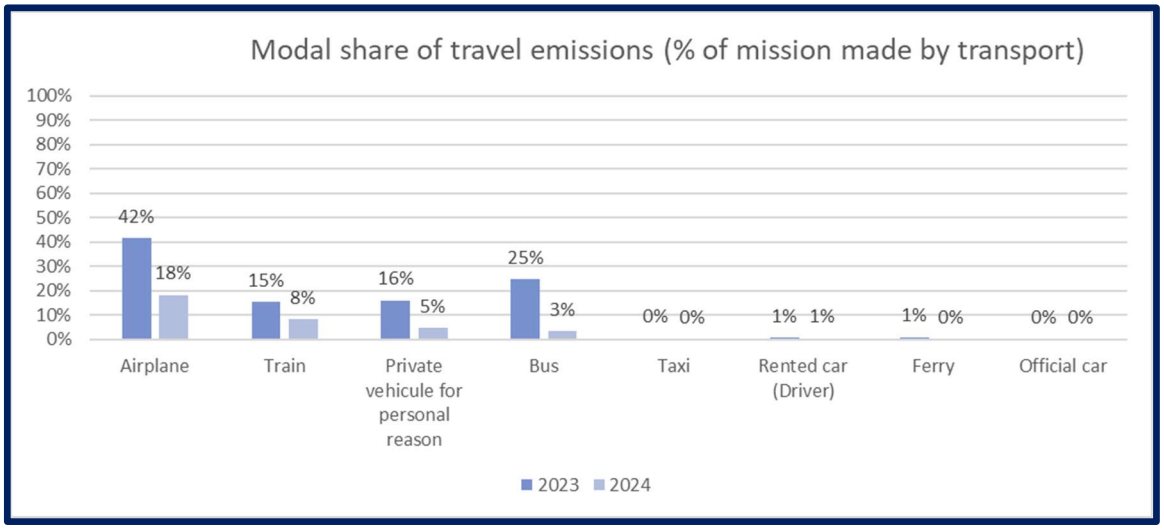


Figure 27 - CO_2 emissions per type of transport in tons

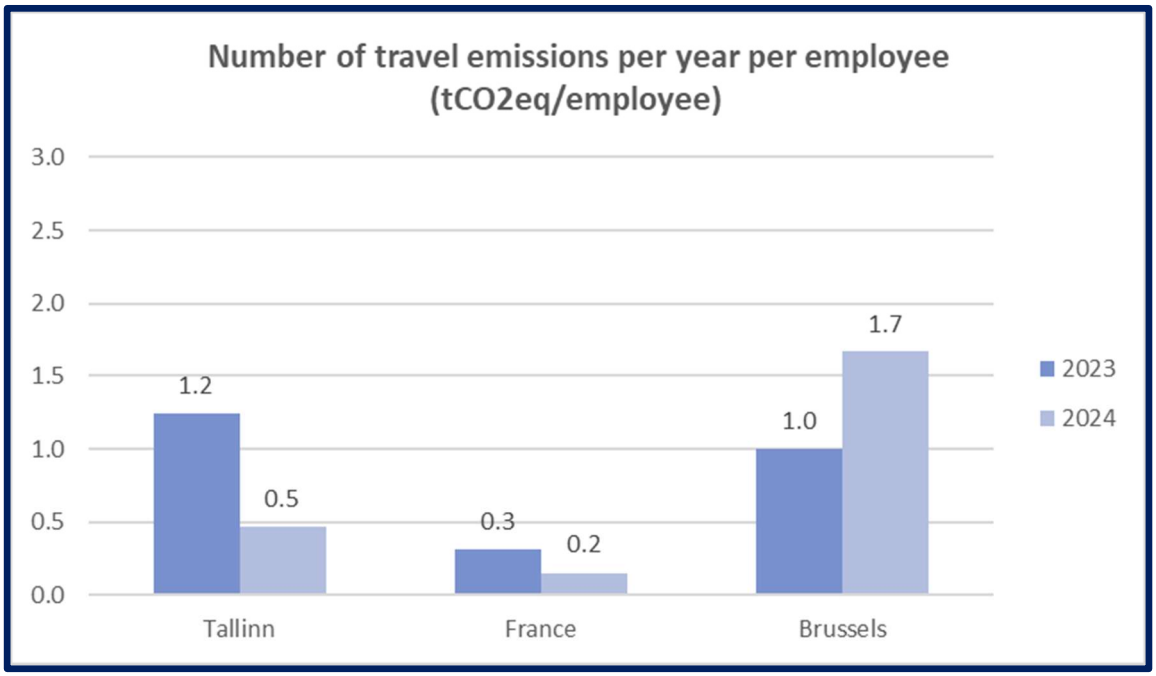


Figure 28 - Number of travel emissions per year per employee (TCO_2eq/employee)

In 2024, eu-LISA created new greening rules for mission and authorized travels in order to reduce employee commuting. This approach entails making it clear to all staff that video conferencing facilities are available to all, and their use is encouraged.

7.9. Biodiversity

eu-LISA's activities do not have a huge impact on biodiversity. Only organic products are used for gardening.

In Tallinn, green areas represent 62% of the global area, which are located around the site and on parking' roof. Biodiversity indicators are detailed in table 14 below.

Biodiversity indicator (m^2)	2024	
Total use of land	3 627 m^2	30 $m^{2/}$employee
Total sealed area	2 107 m^2	17 $m^{2/}$employee
Total nature-oriented area on site	2 260 m^2	19 $m^{2/}$employee
Total nature-oriented area off- site	0 m^2	0 $m^{2/}$employee

Table 14 – Biodiversity indicator for Tallinn site

In Strasbourg, green areas represent 44% of the global area, which are located outside of sealed area. Biodiversity indicators are detailed in table 15 below.

Biodiversity indicator (m^2)	2024	
Total use of land (m^2)	16 625 m^2	41 $m^{2/}$employee
Total sealed area (m^2)	7 842 m^2	20 $m^{2/}$employee
Total nature-oriented area on site	7 296 m^2	18 $m^{2/}$employee
Total nature-oriented area off- site	0 m^2	0 $m^{2/}$employee

Table 15 – Biodiversity indicator for Strasbourg site

For Illkirch-Graffenstaden site, it's only an office rented building so biodiversity indicators are detailed in table 16 below.

Biodiversity indicator (m^2)	2024	
Total use of land (m^2)	2074 m^2	25 $m^{2/}$employee
Total sealed area (m^2)	2074 m^2	25 $m^{2/}$employee
Total nature-oriented area on site	0 m^2	0 $m^{2/}$employee
Total nature-oriented area off- site	0 m^2	0 $m^{2/}$employee

Table 16 – Biodiversity indicator for Illkirch-Graffenstaden site

For Brussels site, it's only an office rented building so biodiversity indicators are detailed in table 17 below.

Biodiversity indicator (m^2)	2024	
Total use of land	98 m^2	16 $m^{2/}$employee
Total sealed area	98 m^2	16 $m^{2/}$employee
Total nature-oriented area on site	0 m^2	0 $m^{2/}$employee
Total nature-oriented area off- site	0 m^2	0 $m^{2/}$employee

Table 17 – Biodiversity indicator for Brussels site

7.10. Impact on climate: GHG emissions

eu-LISA started to calculate the CO_2 emissions in 2020, but only for its electricity consumption and missions, and without taking into account green electricity.

Starting from 2023, the Agency decided to use a platform dedicated to GHG emissions calculation with the support of consultants. In Annex III, it is shown how the use of a dedicated tool for GHG emission calculation has increased the accuracy of the results.

Then, the GHG emissions are calculated with the Aktio tool which uses Bilan Carbon methodology. Scope 1 and 2 emissions are fully reported-on. Scope 3 is based on GIME recommendations[5], when data are available, they include:

- Purchased of other goods
- IT hardware
- On-Site software licensed
- Miscellaneous fixed assets
- Waste
- Business travel
- Commuting to work
- Wastewater

The objectives for the coming years are:

- To be able to consider, in the calculation, the impact of the transport of visitors and customers.
- To increase the data accuracy.

Following this kind of emission, a specific conversion factor following data source detailed in Table 18 below:

Sites	Category	Poste	Source of data
TLL, BXL,	Energy and fluid	Electricity, gas,	AIB
SXB, ILK			Base Empreinte-Ademe
TLL, SXB, ILK	Procurement and immobilisation	Procurements, Other immobilisations	Base Empreinte-Ademe
SXB, TLL, ILK	Waste	Water sewerage	Base Empreinte-Ademe
SXB	Transport	Fioul	Base Empreinte-Ademe
SXB, TLL, ILK	Transport	Commuting home-work	Base Empreinte-Ademe
SXB, TLL	Procurement and immobilisation	IT	HPE
TLL, SXB, ILK, BXL	Waste	Waste managed by sub-contractors	Base Empreinte-Ademe
SXB, TLL, BXL	Transport	Employee commuting	Outil MIPS (tool)

Table 18-Source of data for conversion factor

[9] GIME recommendations – Ref ARES (2017) 6028470 – 08/12/2017

Compared to previous year, the Agency's carbon footprint increased in 2024 mainly due to the increase of electricity consumption at all sites (i.e., new systems, new works). Also the volume of data was increased, namely in reporting district heating consumption for Tallinn.

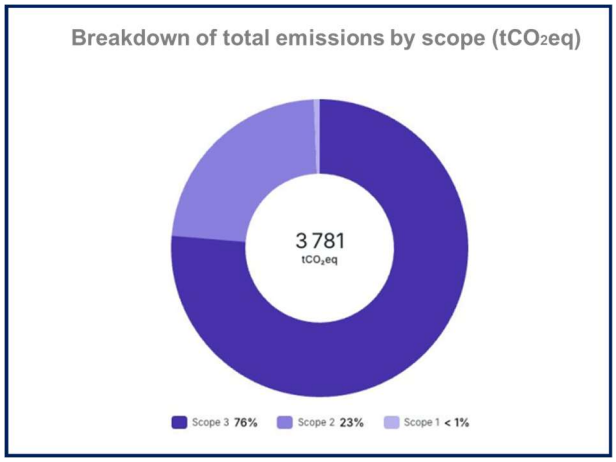


Figure 29- Overview results by scope

If we compare each eu-LISA site, the operational site located in Strasbourg is the highest emitter of tons of carbon dioxide equivalent (figure 30).

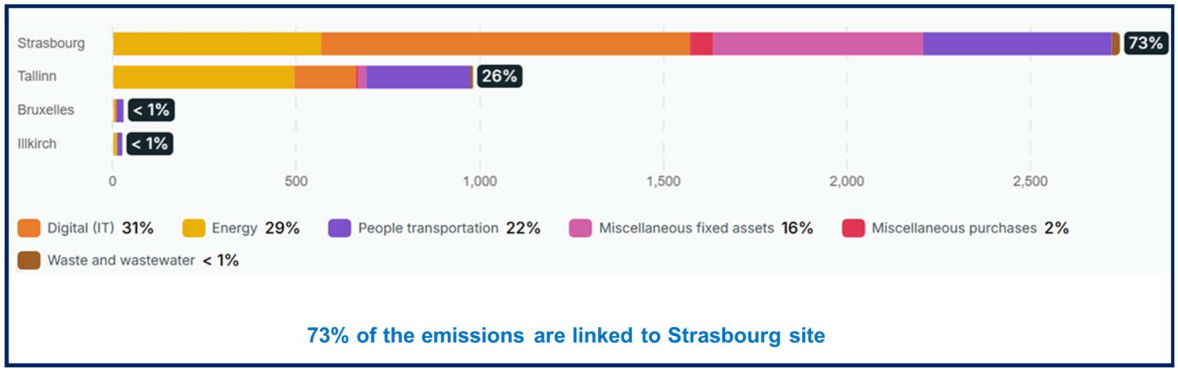


Figure 30- Overview results by sites

Going deeper into sub-categories, we observe that the highest emitter of tons of carbon dioxide equivalent is electricity (figure 31).

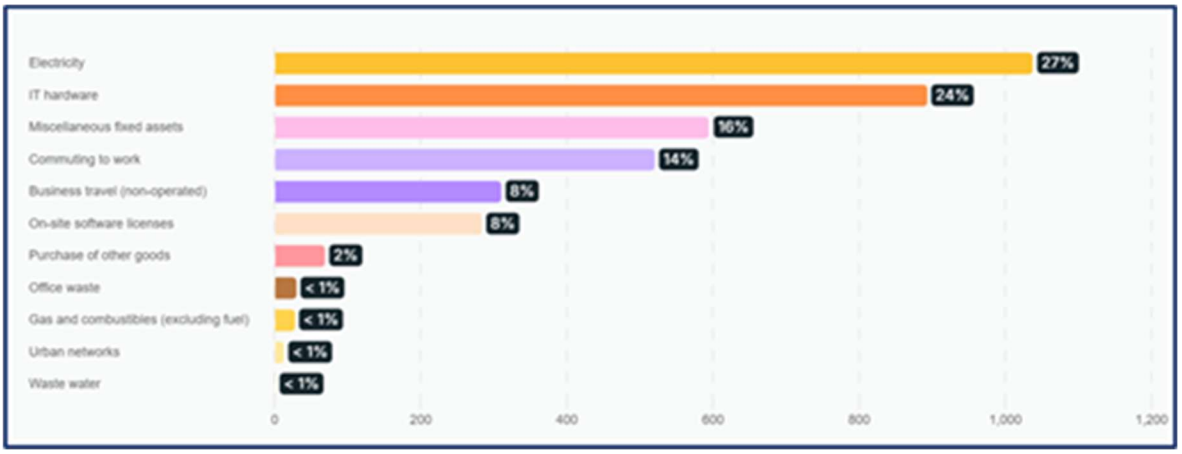


Figure 31- Overview results by sub-categories

To improve the energy efficiency of data centres, as a short-term solution, the Agency worked towards enabling a more efficient use of the current cooling infrastructure. However, in efforts to reduce carbon footprint in mid-term, the Agency will implement a solution based on a geothermic to reduce overall power usage effectiveness (PUE) in compliance with the EU guidelines for improving.

2024 GHG emissions: 3 781 tCO_2 eq vs 3 507 tCO_2 eq for 2023.

Increased by 7%, This rise is mainly due to improved data availability for carbon footprint calculations, as the 2024 assessment included district heating for Tallinn and gas consumption for Brussels, which were not accounted for in 2023.

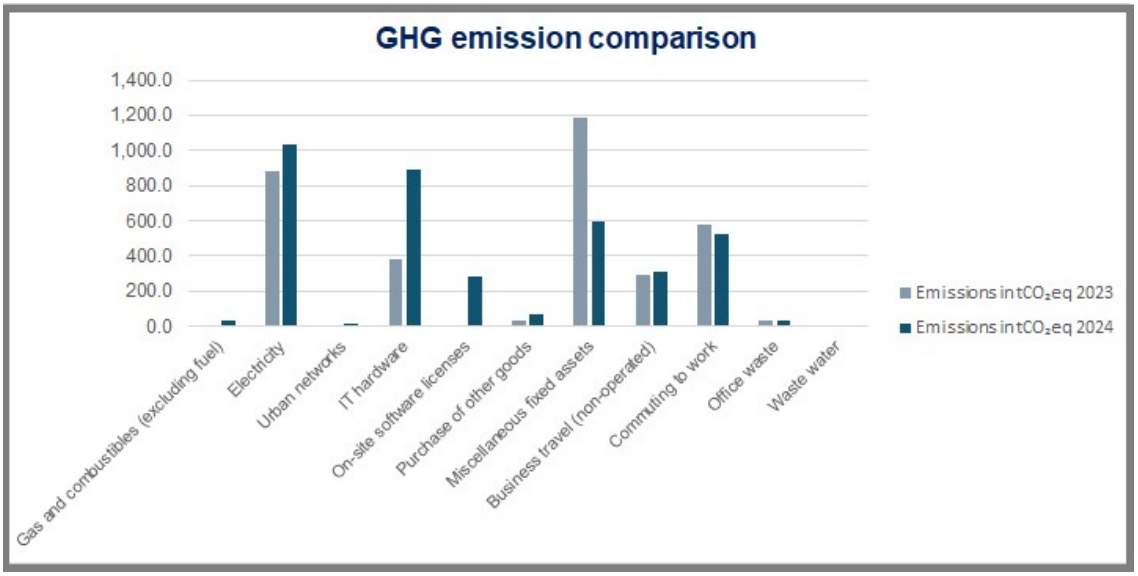


Figure 32 - GHG emission comparison by year

Scope 1 (direct emissions from gas consumption in Brussels) represents less than 1% of total emissions, down from 3% in 2023 due to improved refrigerant gas leakage estimations.

Scope 2 (indirect emissions from electricity and heating) accounts for 23% of emissions, reflecting the inclusion of district heating in calculations.

Scope 3 (indirect emissions from suppliers, commuting, and business travel) remains the largest contributor at 76%. The top three sources of emissions are IT hardware, fixed assets, and commuting

Additionally, the Agency will define a carbon neutral strategy in order to reduce its GHG emissions to achieve climate neutrality by 2030, according to the ED decision endorsed on the EUAN Charter on the reduction of greenhouse gas emissions and responsible environmental management.

7.11. Summary of relevant environmental indicators:

In 2024, environmental performance of eu-LISA activities is summarised in Table 19 below:

Site	Topics	Environmental performance
TLL	Energy efficiency in building: electricity	6.5 MWh/employee 0.69 MWh/m^2
	Energy efficiency in building: District Heating	1.3 MWh/employee 0.04 MWh/m^2
	Renewable energy	7.4 MWh/employee
	Non-renewable energy	0.4 MWh/employee
	Waste	11.6 T (88.6% of Non-hazardous waste; 11.4% of Hazardous waste) 95 kg/employee
	Water	5.7 m^3/employee
	Material efficiency	2.61 Pages/Day/Employee 2.9 kg/employee
	Travel emissions	66 t CO_2 eq
	Biodiversity	Total use of land: 3 627 m^2; 30$m^{2/}$employee Total sealed area: 2 107 m^2; 17 $m^{2/}$employee Total nature-oriented area on site: 2 260 m^2; 19 $m^{2/}$employee Total nature-oriented area off- site: 0 m^2; 0 $m^{2/}$employee
SXB	Energy efficiency in buildings: electricity	2.0 MWh/employee 0.37 MWh/m^2
	Energy efficiency in Data Centre: electricity	4 657 MWh
	Renewable energy	23.4 MWh/employee
	Waste	31.0 T (77.8% of Non-hazardous waste; 22.2% of Hazardous waste) 77 kg/employee
	Water	4.8 m^3/employee
	Material efficiency	1.02 Pages/Day/Employee 1.1 kg/Employee
	Travel emissions	58 tCO_2 eq
	Biodiversity	Total use of land: 16 625 m^2; 41$m^{2/}$employee Total sealed area: 7 842 m^2 ; 20$m^{2/}$employee Total nature-oriented area on site: 7 296 m^2; 18$m^{2/}$employee Total nature-oriented area off- site :0 m^2 ; 0$m^{2/}$employee

Site	Topics	Environmental performance
ILK	Energy efficiency in buildings: electricity	2.3 MWh/employee 0.10 MWh/m^2
	Non-renewable energy	2.3 MWh/employee
	Waste	3.9 T (100.0% of Non-hazardous waste) 46 kg/employee
	Water	5.1 m^3/employee
	Material efficiency	2.99 Pages/Day/Employee 3.3 kg/employee
	Travel emissions	N/A (included in Strasbourg site)
	Biodiversity	Total use of land: 2074 m^2; 25 $m^{2/}$employee Total sealed area: 2074 m^2; 25 $m^{2/}$employee Total nature-oriented area on site: 0 m^2; 0$m^{2/}$employee Total nature-oriented area off- site :0 m^2; 0$m^{2/}$employee
BXL	Energy efficiency in buildings: electricity	0.6 MWh/employee 0.04 MWh/m^2
	Energy efficiency in buildings: gas	4.1 MWh/employee 0.3 MWh/m^2
	Non-renewable energy	4.9 MWh/employee
	Waste	0.3 T (100.0% of Non-hazardous waste) 47 kg/employee
	Water	2.3 m^3/employee
	Material efficiency	4.94 Pages/Day/Employee 5.4 kg/employee
	Travel emissions	10 tCO_2 eq
	Biodiversity	Total use of land: 16 m^2; 14$m^{2/}$employee Total sealed area: 16 m^2 ; 14$m^{2/}$employee Total nature-oriented area on site: 0 m^2; 0$m^{2/}$employee Total nature-oriented area off- site :0 m^2; 0$m^{2/}$employee
ALL	GHG emission	3 781 tCO_2 eq
	Biodiversity	Total use of land: 22 424 m^2 ; 37 $m^{2/}$employee Total sealed area: 12 121 m^2 ; 20 $m^{2/}$employee Total nature-oriented area on site: 9 556 m^2 ; 16$m^{2/}$employee Total nature-oriented area off- site: 0 m^2 ;0$m^{2/}$employee

Table 19-Summary of relevant indicators

8. Legal and other environmental requirements

In Tallinn and in Strasbourg, eu-LISA have an agreement with the Estonian and French governments respectively for each building. In these cases, eu-LISA has an authorisation permit from Tallinn (council of town planning) and from Strasbourg (environmental administration). The Illkirch-Graffenstaden, Brussels and Aspire sites are rented buildings where a contract exists between the landlord and eu-LISA, and limit the Agency's actions in terms of legal environmental requirements.

eu-LISA complies fully with the requirements of the applicable legislation and its operating permits.

Details on permits and contracts for all eu-LISA sites are summarised in Table 20 below.

The Agency is bound by the relevant regulations and the European legal framework. As a European Agency, it regularly reports on its environmental management in its governance documents, as well as on its environmental performance via this statement.

Environmental requirements come from French, Estonian, Belgian regulations (the vast majority of which stem from European directives or regulations).

The biggest focus for the years to come will be:

- on energy efficiency as the French regulations have set as a target of –40% energy consumption for 2030 (baseline no later than 2010) for all tertiary buildings.
- on the data centre to improve its energy consumption efficiency.

All relevant environmental requirements are therefore integrated into the online legal compliance register (echoline) platform, which provides for:

- annual self-analysis of compliance with environmental legislation (in Estonia, France and Belgium);
- regular updates on any new regulations.

If action is needed to correct or prevent non-compliance, it will be integrated into the Environmental Action Plan and followed through until completion.

Site	Kind of document	Scope of agreement	Signed by	Signature date
TLL	Authorisation permit (nr1812371/08020)	All activities of eu-LISA in Tallinn	Council of Town Planning	05/07/2018
	Headquarters agreement	Building and support of eu-LISA staff in Tallinn	Government of the Republic of Estonia and Executive Director (ED) of eu-LISA	19/12/2014
	Memorandum of Understanding	Utilities, maintenance and cleaning,	Chairman of the Management Board of Riigi Kinnisvara AS (intermediate body) and Head of Corporate Services of eu-LISA	01/01/2021
SXB	Operational site agreement	Building and support of eu-LISA staff in Strasbourg	Government of France and ED of eu-LISA	05/12/2013
	Updated authorisation permit (nrA-1JNRWF3TBX)	Declaration status for using cooling system and power generator (1185-2a and 2910-A-2)	Eu-LISA	05/10/2021
ILK	Lease for the exclusive use of offices	Administrative activities of eu-LISA	Private company and the ED of eu-LISA	30/06/2020
	Operational site agreement	Building and support of eu-LISA staff in Strasbourg	Government of France and the ED of eu-LISA	05/12/2013
BXL	Shared with other agencies. Leased building with an agreement for the provision of premises	Dedicated activities at the Liaison office sector	Private company and Head of Corporate Services of eu-LISA	26/01/2023
Aspire	Lease for the exclusive use of offices and parking	Administrative activities of eu-LISA	Private company and the ED ad interimof eu-LISA	30/07/2024
	Operational site agreement	Building and support of eu-LISA staff in Strasbourg	Government of France and the ED of eu-LISA	05/12/2013

Table 20-Details of permits and contracts for each site

9. Annexes

9.1. ANNEX I: ENVIRONMENTAL VERIFIER'S DECLARATION ON VERIFICATION AND VALIDATION ACTIVITIES

AENOR

ENVIRONMENTAL VERIFIER'S DECLARATION ON VERIFICATION AND VALIDATION ACTIVITIES

AENOR CONFÍA, S.A.U., with EMAS environmental verifier registration number ES-V-0001, accredited for the scopes 99.0 Activities of extraterritorial organisations and bodies and 62.03 Computer facilities management activities (NACE Codes),

declares to have verified whether the organisation as indicated in the environmental statement of the organization EU-LISA (EUROPEAN UNION AGENCY FOR THE OPERATIONAL MANAGEMENT OF LARGE-SCALE IT SYSTEMS IN THE AREA OF FREEDOM, SECURITY AND JUSTICE) with registration number EE-000032,

meet all requirements of Regulation (EC) N° 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community Eco-Management and Audit Scheme (EMAS).

By signing this declaration, I declare that:

- the verification and validation has been carried out in full compliance with the requirements of Regulation (EC) N° 1221/2009,
- the outcome of the verification and validation confirms that there is no evidence of non-compliance with applicable legal requirements relating to the environment,
- the data and information of the environmental statement of the organisation reflect a reliable, credible and correct image of all the organization within the scope mentioned in the environmental statement.

This document is not equivalent to EMAS registration. EMAS registration can only be granted by a Competent Body under Regulation (EC) N° 1221/2009. This document shall not be used as a stand-alone piece of public communication.

Done at Madrid, on 29/10/2025

Signature of the Verifier

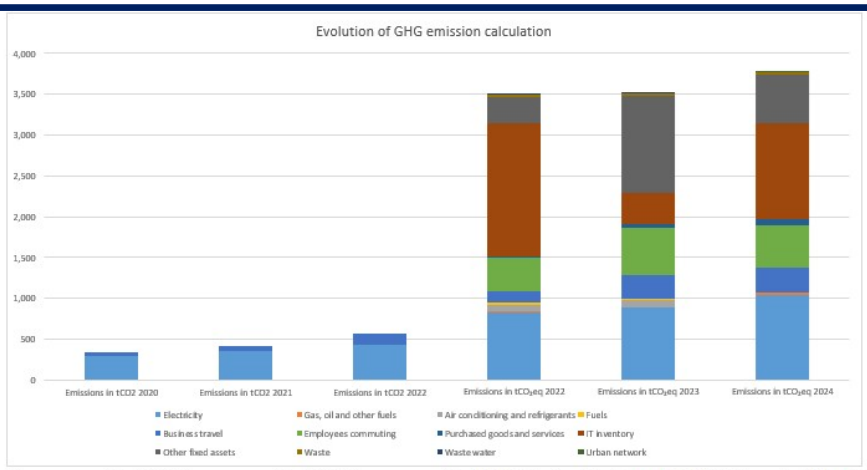
AENOR CONFÍA, S.A.U.

9.2. ANNEX II: METHODOLOGICAL ASSUMPTIONS

The sources of data and hypotheses taken for the GHG consumption calculation are the following:

Data	Site	Kind of evidence	Service	Periodicity	Level of accurency
EMPLOYEE	SXB,TLL,BXL	Real data for staff member+intern	HR	On request	Extact
	SXB/ILK	From security service for intramuros/extramuros 2024/MWO	Security	On request	Extact
	ALL	Intramuros/extramuros 2024	FWC manager	On request	Extact
	ILK	A calculation based on a ratio of ILK site represent 1/3 of worker located in France sites (SXB+ILK)	HR	On request	Approximate
Surface	SXB, ILK, BXL, Aspire	offices surface comes from SPD 2025-2027	MC	On request	Extact
	SXB	Data center area comes from eu-LISA Building surfaces	Facilities	On request	Extact
	TLL	Green area : https://xgis.maaamet.ee/xgis2/page/app/maainfo District heating: all building-authorization permit	Estonian Authoritiy	On request	Extact
Electricity consumption	TLL	Sub-metering round	RKAS sub-contractor	Monthly	sub-metering
	SXB	Sub-metering round	Axima sub-contractor	Monthly	sub-metering
	ILK	Sub-metering round	Axima sub-contractor	Monthly	sub-metering
	BXL	Caculation on hypothesis Calcul on surface aera following worktation 366 WS= 366 x 6 (10 m3/2,5+ 2)*= 2196 m2 -eu-LISA have 98 m2 which represented 22% A ratio is calculated following *https://emploi.belgique.be/fr/themes/bien-etre-au-travail/lieux-de-travail/exigences-fondamentales/dimension-et-volume-des-locaux#:~:text=Les%20locaux%20de%20travail%20ont,superficie%20libre%20de%202%20m	Landlord	On request	Approximate
Gas consumption	BXL	Caculation on hypothesis Calcul on surface aera following worktation 366 WS= 366 x 6 (10 m3/2,5+ 2)*= 2196 m2 -eu-LISA have 98 m2 which represented 22% A ratio is calculated following comsumption of all site *https://emploi.belgique.be/fr/themes/bien-etre-au-travail/lieux-de-travail/exigences-fondamentales/dimension-et-volume-des-locaux#:~:text=Les%20locaux%20de%20travail%20ont,superficie%20libre%20de%202%20m%C2%B2.	Landlord	On request	Approximate
Distric heating consumption	TLL	FOKA register	RKAS sub-contractor	Monthly	sub-metering
PUE value	SXB	Sub-metering round	Axima sub-contractor	Monthly	sub-metering
Water consumption	TLL	FOKA register	RKAS sub-contractor	Monthly	sub-metering
	SXB	Sub-metering round	Axima sub-contractor	Monthly	sub-metering
	ILK	Sub-metering round	Axima sub-contractor	Monthly	sub-metering
	BXL	Caculation on hypothesis Calcul on surface aera following worktation 366 WS= 366 x 6 (10 m3/2,5+ 2)*= 2196 m2 -eu-LISA have 98 m2 which represented 22% A ratio is calculated following annual water bills *https://emploi.belgique.be/fr/themes/bien-etre-au-travail/lieux-de-travail/exigences-fondamentales/dimension-et-volume-des-locaux#:~:text=Les%20locaux%20de%20travail%20ont,superficie%20libre%20de%202%20m%C2%B2.			Approximate
Waste generated	BXL		EHS	On request	Approximate
	SXB	An internal calculation was performed in using data from Strasbourg site and in applying a weighting factor based on worker. This approach enables us to have a global view of wastes generated and focus on our effort to implement a process of scaling on sites which will produce more than 10 % of waste toward global waste.	City service provider/neutralis	Yearly/Monthly	Accurate
	TLL	Liter of waste provided by Tallinn city provider Density value, provided from general Estonain consultant based on general value	City service provider	Monthly	Accurate
	ILK	Internal calculation of household waste and recovery waste	Facilities	Monthly	Approximate
Mission	All	Data from MIPS tool Staff members who work from Bucharest, Frankfurt, Ljubljana, Luxembourg, Warsaw and Copenhagen are attributed to Headquarter Q by default: Estonian	Mission	On request	Calculation
Emission factor	ALL	From calculation by AKIO consultancy Leakage: information comes from FM subcontractor Visitor travel: no data, hypothesis : negligible; Commuting: answers of survey (2023) extrapolated to total workforce based on participant responses (26% Strasbourg, 61% Illkirch-Graffenstaden, 11% Tallinn) – high uncertainties following the low level of responses Purchases and fixed assets: data extraction from the accounting files (in €)	AKIO, provider	On request	Calculation

9.3. ANNEX III: Evolution of methodology of GHG calculation



Type of emissions	Emissions in tCO_2 2020	Emissions in tCO_2 2021	Emissions in tCO_2 2022	Emissions in tCO_2eq 2022	Emissions in tCO_2eq 2023	Emissions in tCO_2eq 2024
Electricity	296	355	425	831.2	883.2	1,037.2
Gas, oil and other fuels				7.1	7.1	28.1
Urban network						13.0
Air conditioning and refrigerants				86.8	86.8	0.0
Fuels				17.3	17.3	0.0
Business travel	45	56	143	143.7	294.0	310.3
Employees commuting				417.6	582.0	520.4
Purchased goods and services				2.7	35.9	68.9
IT inventory				1,632.0	378.2	1,177.4
Other fixed assets				323.8	1,190.1	594.1
Waste				28.2	31.5	30.1
Waste water				0.6	0.7	1.5
Total	**341**	**411**	**568**	**3,491**	**3,507**	**3,781**

Figure 31 - Evolution of GHG emissions calculation

Figure 31 shows, for the year 2022, how the calculation has evolved. eu-LISA started to calculate its CO_2 emissions in 2020, but only for electricity consumption (scope 2) and missions (scope 3), without taking into account the green electricity consumed in Estonia.

By integrating the Aktio tool, this has allowed us to consider not only CO_2 emissions but all GHG emissions (scopes 1, 2, 3).

In 2023, calculations for the 2022 data were conducted using the same method as before. By the end of 2023, the new tool had been adopted which facilitated updated calculations and allowed us to evaluate the differences between the two ways of calculation.

In 2024, the same method than 2023 was used, in using Bilan carbon methodology, by means of Aktio platform, to calculate the eu-LISA's carbon footprint.