2025 Environmental Statement

(From 1January 2025 to 31 December 2025)

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

www.eulisa.europa.eu

eu-LISA

ENVIRONMENTAL STATEMENT 2025

EMAS
VERIFIED
ENVIRONMENTAL
MANAGEMENT
EE-000032

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Table of contents

Foreword

Dear Colleagues,

eu-LISA has set the objective of becoming carbon neutral by 2030. To achieve this, we continue to integrate environmental sustainability into our policies and daily practices, which are guided by the European Green Deal and the United Nations Sustainable Development Goals.

Since 2022, we have been improving our environmental performance and reducing the Agency's environmental impact by implementing an environmental management system following the EU's Eco-Management and Audit Scheme (EMAS).

With EMAS registration, eu-LISA can look forward to a more 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 2025.This Statement serves as a testament to our ongoing efforts to create a greener and more sustainable future for all of us.

I extend my gratitude to all eu-LISA staff members for their dedication and contributions in progressing with 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 Deputy Executive Director

1. 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 2025 (reporting year from 1 January 2025 to 31 December 2025).

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.

2. About EU-LISA

2.1. What we do

2.1.1. 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),
- 62.20 (complementary code): Computer consultancy and 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.

2.1.2. 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.

2.2. Teams and location

eu-LISA is located in four countries:

- the headquarters - administrative site - is located in Tallinn (Estonia), 3627 m² - 146 employees;
- the operational site is located in Strasbourg (France), 35683 m², including the Data Centre, approximately 426 employees;
- an administrative site in a rented building is located in Illkirch-Graffenstaden (France), since 2022, 2074 m² - approximately 109 employees;
- a liaison office shared with other agencies is located in rented offices in Brussels (Belgium), 305 m² - 6 employees.
- An administrative site in a rented building, is located in Strasbourg Aspire (France), 4830 m² - 178 employees;

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

In 2025, eu-LISA employed 385 staff members (average number in 2025) (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 480, on the same date. These data are used throughout the document in graphs where the number of employees is referenced in applying a ratio of 0.6 for staff members and external provider in considering the teleworking rate.

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.

The last, Nevertheless, all performance assessment data, including land use and waste indicators, are presented as a comparison with the last two years of operation. Indeed, with the return to the office following the phasing out of social restrictions in the context of the COVID-19 pandemic, 2023 is the first yearly reference to assess environmental performance.

2.3. 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.

3. Description of the Environmental Management System

3.1. 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. The Agency has obtained the eco management and audit scheme (EMAS) registration on 1st April 2025.

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

This is therefore the third 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)

3.2. 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 2025, 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	Endorsement of EUAN charter on Climate neutrality for 2030	R Reputational risk of greenwashing;
		O Synergy to improve, while saving resources;
	EE Area specifies exemplarity requirements	O Be an EEA front-runner with EMAS registration;
	Euro Metropole de Strasbourg is informed about our project development	O Benefit of free service from city on mobility topics;
	Budget constraint	R No means to implement environmental progress
		O Benefit of subsidiaries from sates on ecological transition projects
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
	Teleworking	R Increasing of individual carbon footprint
		O Reduce of carbon footprint of the Agency
Technology	Buildings extension	R Increasing of carbon footprint of the Agency
		O Apply eu-LISA's GPP policy+ env. assessment in the business case
	New projects (building/DC/equipment):	R Taking into account environmental regulation before starting project (ICPE, IOTA,...)
		O Use of outcome from Study on Green DC (Soprestaria), from energy audit (BV), from physical climate risks audit (Vinci FA
Environmental	Climate change may lead to more heat waves	R Making it difficult to reduce the energy consumption needed for cooling the DC
		O Improve cooling of the DC in using geothermal source of well
		R Creating discomfort to building's users
		O Photovoltaic sunshades, light-colored cladding and green facade
	Natural risks	R For France sites: floods, for Tallinn site: long-term submersion
		O rainwater harvesting project
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.

3.3. 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 and Deputy 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.

3.4. Key steps in the maintenance of EMAS

In 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.

4. 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.

4.1. 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 12. 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 **2025 EMAS environmental aspects.**

4.2. Significant environmental aspects and impacts

Process Owner	SEA	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
Maintenance of IT Solutions and Systems	Electricity consumption	D	Depletion of non-renewable sources; pollution of water, air; greenhouse effect,
Facilities	Electricity consumption	D	Depletion of non-renewable sources; pollution of water, air; greenhouse effect,
	Waste water	D	Depletion of non-renewable sources; pollution of water, greenhouse effect,
	Waste heat	D	Depletion of non-renewable sources; greenhouse effect
	Chemical spills	ES	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 (SEA) decreased between 2024 and 2025 mainly because of finalizing project of implementation of new Modular Data Centre 2.1. There are other reasons which are detailed in table 5 below:

Year	2023	2024	2025
SEA	13	19	15
Modification	Updated of SEA and impact Updated of risk assessment following action implemented, means control, carbon footprint results, incident, new environmental procedures and outcomes of EMAS audits (internal and external)		

Table 5 – Comparison of SEA 2023, SEA 2024 and SEA 2025

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

In its comprehensive environmental review in 2025, 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.

5. Environmental Policy and objectives

5.1. 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 Environmental Policy 2025

eu-LISA Environmental Commitments

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

01
Improving Energy Performance of Building and Data Centre

02
Preventing, Sorting, Recycling Waste

03
Promoting Sustainable Mobility

04
Preserving Natural Resources and Preventing Pollution

05
Applying Greening Rules for Missions and Authorised Travel to Reduce CO_2 Emissions

06
Applying Green Public Procurement Strategy

07
Developing Environmental Awareness, Training, and Communication

Ref. Ares(2025)6773070-01/08/2025

eu-LISA
Go Green

5.2. 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.

Table 6 below summarizes actions corrective to be implemented to achieve environmental objectives 2025 (postponed from 2024):

Aspect		2025	Responsible Sector/Team	Initial deadline	Achievement
Energy	E.2	Identify three best practices for green data centres (DCs) that could be implemented, and then define the actions to implement them;	GESS (Facilities)	Q2-25	100%
	E.3	Improve the calculation of the PUE for the DC in using 100% data submetering or electrical consumption record	GESS (Facilities)	Q2-25	50%
Procurement	P.1	Initiate 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)/GESS (EHS team)	Q2-25	83%
	P.2	For future tenders, if GPP guidelines already exist for their category, start training for 80% of relevant staff members on GPP (6 online sessions to be performed)	GESS (EHS Team)	Q2-25	100%
Project	J.1	Update project business templates to include an evaluation of the environmental impact of each new projects	GESS (EHS Team), Operations	Q2-25	100%*
All	A.2	Provide an awareness session on EMAS and eu-LISA's Environmental Policy to 100% of newcomers	HRU (Talent Management Team)/GESS (EHS team)	Q3-25	100%
Air emission	T.2	Implement a transport Policy in eu-LISA for all sites	HRU/GESS (EHS team)	Q4-25	Cancelled**
Energy	E.1	Use of 100% green electricity for BRU, Aspire, ILK	GESS (Facilities)	Q4-25	100%

Table 6 – Actions corrective to achieve 2025 Environmental Objectives

Table 7 below summarizes the key objectives and targets that will be prioritized in 2025

Aspect	Objectives	Target	Achievement
Energy consumption	Improving energy performance of building and data centre	-2% MWh/m^2 (SXB-Tertiary offices building)	+11% MWh/m^2 (baseline 2024)*
		Inferior to 1.3 PUE (for new DC)	MDC1= 1.18 MDC2= 0 (no activity)**
		Inferior to 1.7 PUE (current DC)	1.7
	Green electricity (BRU-Aspire, ILK)	100%	100%
Procurement	Applying Green Public Procurement strategy	100%	100%
Waste	Preventing, sorting, recycling waste	For all sites 90% of recovery waste	100%
Raw material	Preserving natural resources in using circular economy	60% material recovery 60% Furniture 60% ICT	81%
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	83%
Air emission	Promoting sustainable mobility	One awareness session by year	2
All	Improving environmental culture in providing environmental awareness at all levels of the organisation	Three awareness session on environmental aspect by year	18

Table 7 - 2025 Environmental Objectives

*Assessment of the environmental impact for project was done and integration within project business case template was discussed and finally it will be integrated directly within procurement process.
**Transport policy was cancelled because of budget constraint
*** Electricity consumption of Batcomm is now linked to Tertiary offices; Using humidifiers due to dry air; Increasing of external contractors on premise (EES pre-production environment, ..)
**** These values represent a trend which is calculated on available data during a sampling period.

In 2025, environmental objectives are achieved at 90 %. As objective number E.3 has an important impact on EMS, it will be maintained for 2026.

5.3. Objectives for 2026

Based on the Environmental Policy, significant environmental aspects, the greenhouse gas emissions' calculation, and risks and opportunities, the following objectives were set in 2026 (table 8).

Aspect	Objectives	Target
Energy consumption	Improving energy performance of building and data centre	**-5%** MWh/m^2 (French tertiary buidings: SXB, ILK, Asp)
		Inferior to 1.3 PUE (for new DC)
		Inferior to 1.7 PUE (current DC)
	Partial implementation of ISO 50001 (energy management) for all sites	Energy and water counting plan
		Energy review
Procurement	Training on sustainable IT	1
Waste	Preventing, sorting, recycling waste	For all sites
		95% of recovery waste
Raw material	Preserving natural resources in using circular economy	70% material recovery
		70% furniture
		70% ICT
Air emission	Reduction of number of mission	**-10%**
Air emission	Promoting sustainable mobility	One awareness session on best practices for all sites
All	Improving environmental culture in providing environmental awareness at all levels of the organisation	Five awareness session on environmental aspect by year
		Go Green campaign project (100%)

Table 8 - 2026 Environmental Objectives

6. Actions and performance

The following sections report on the eu-LISA performance over in its relatively short history, and a comparison of 2025 compared to 2024 and 2023, which the yearly basis, is presented.

The variations in environmental indicators observed in 2025 compared to 2024 are primarily driven by increased operational capacity due to the entry into operation of several new large-scale IT systems (i.e., sBMS, VIS, and EES), together with related infrastructure upgrades and increase in overall IT workload.

Additional contributing factors were improvements in data collection and weather conditions, i.e. heating degree days. Overall, while some indicators increased due to expansion of operational scope and improved data collection, eu-LISA continues to implement measures to optimize energy efficiency, reduce waste, and lower its carbon footprint.

Note 1: A major development during the reporting year was the inclusion of the new Aspire building within the Agency's energy efficiency monitoring scope, following its occupation in May 2025.

Note 2: in the Brussels site, the liaison office moved to new building located on 23rd April 2025. The Agency occupied a complete floor, and it was possible to better assess and follow the environmental impact of its activities. Indeed, a ratio of 0.06 was applied for the global energy, water and waste consumptions at the site. This ratio corresponds to the area occupied by eu-LISA compared to area of all the building. Even if the Liaison Office moved from 23rd April 2025, we have assumed that these consumptions were appropriate for all the year 2025. Indeed, no data were provided by the former landlord of Liaison office.

Note 3: As teleworking policy is applied and to be closed to real situation in term of occupancy, a coefficient of 0.6 is used for employee number, regarding calculation of environmental performance.

Note 4: In 2025, 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 of eu-LISA.

Note 5: In 2025, 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.

Note 6: The floor area considered corresponds to the total floor area of the tertiary buildings, not just the office space. As a result, the energy intensity ratios (kWh/m²) have been updated for the TLL and SXB sites.

Note 7: In 2025, electricity consumption of Aspire building is based on the monthly utility bills.

6.1. Energy efficiency in buildings

Aspire building was eco-designed and obtained sustainable label during the construction of the building. following environmental standards below:

BREEAM[8] rating "very good": this standard provides a framework to design a high performing and **sustainable** new building. It considers 10 aspects: management, health and well-being, energy, transport, water, materials, waste, land use and ecology, pollution, and innovation.

Label Bepos-effinergie[9] to obtain this label, the building should be eco-designed following French thermal regulation (RT2012) and the French label $E^{+}C^{-}$[10]**.** For example, the thermal regulation (RT2012) and the French label E+ C-, requires energy performance while maintaining the comfort of the occupants.

High Environmental Quality Label for tertiary building[11] it is a French standard which enabled to eco-design the new building in considering energy performance, environment, health and well-being.

Similarly, the new Liaison Office (LO) in Brussels was developed as an eco-designed building and achieved a BREEAM rating of "Very Good" during the construction phase. Compared to the previous Liaison Office, the new premises are three times larger and provide increased flexible workspace capacity through the use of flex desks. On weather aspect compared to 2024, during winter period, external temperatures were colder in Strasbourg but less cold in Tallinn and in Brussels.

In 2025, implementation of new equipment, new systems operational changes were done across eu-LISA sites.

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8. BREEAM New construction: BREEAM stands for "Building Research Establishment Environmental Assessment Methodology", *"uses science-led metrics to assess the sustainability performance of newly designed and constructed assets and new-build extensions to existing buildings. This includes the local, natural or human-created environment surrounding the building."*
9. Label BEPOS (website link)
10. **Label E+ C-** (website link)
11. **High Environmental Quality Label** (website link

At the Agency's headquarters in Tallinn, Estonia, an Artificial Intelligence-driven energy performance tool was introduced to optimise the operation of the HVAC system based on external parameters such as temperature and air quality. At the same time, increased IT activities contributed to higher electricity consumption. To improve monitoring and reporting accuracy, dedicated electricity meters for IT operations were installed during the year.

At the Strasbourg operational site (SXB), the new Modular Data Centre 2.1 (MDC2.1) was commissioned in 2025, although it was not yet operational by the end of the reporting period. In parallel, activities related to MDC1 commenced at the beginning of 2025.

In February 2025, eu-LISA also finalised an energy efficiency audit aimed at identifying major sources of energy consumption and recommending improvement measures. The audit covered both data centre operations and tertiary buildings located in Strasbourg (SXB) and administrative building (ILK).

At the administrative site (ILK), several office relocations took place throughout the year as teams progressively moved to the Aspire building between May and September 2025. As a result, occupancy levels in the ILK building were temporarily reduced during this transition period.

The energy consumption for all sites, with overall and specific data, for 2023-2024-2025 are presented below (figures 1-2):

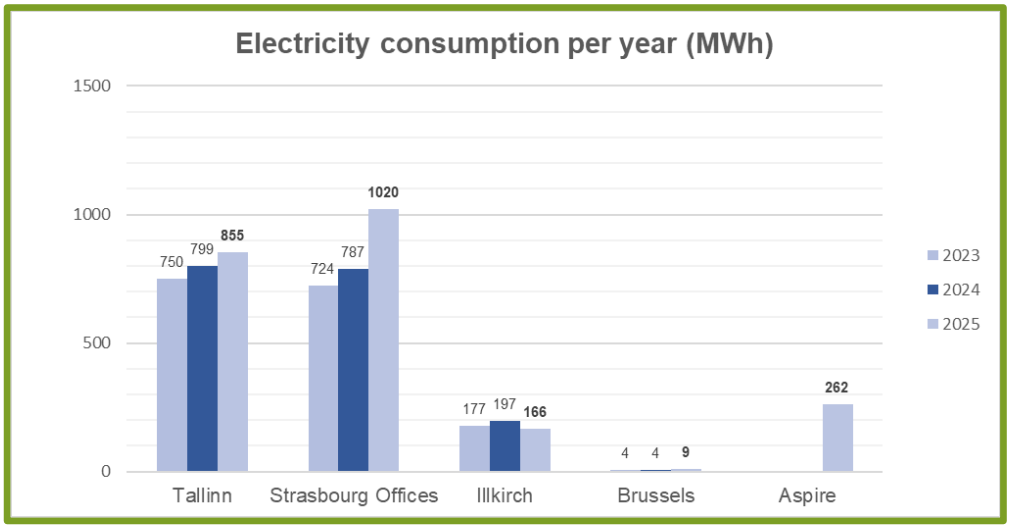

Figure 1- Electricity consumption for offices per site

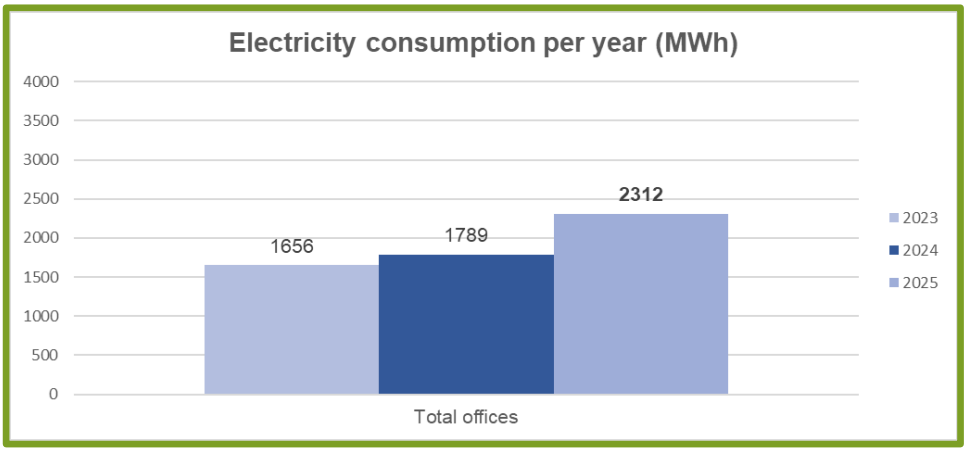

Figure 2 - Global energy consumption for offices and for all sites

Tallinn site: The consumption rose by 7% compared to 2024 and by 14% compared to 2023, mainly due to the addition of IT equipment's in server rooms, increased cooling requirements.

Strasbourg Site: The electricity consumption increased by 30% compared to 2024 and by 40% compared to 2023, due to the installation of new humidifiers, a dehumidifier, a power inverter, a mobile cooling unit, and a vending machine. Moreover, since 2025, the old, containerised building (Batcomm) is now linked to tertiary building and not to Data Centre anymore. The electricity consumption of this old one and not insulated building affect consumption of tertiary building and a colder climate, reflected in an 8% increase in heating-degree days.

Illkirch-Graffenstaden site: saw an 16% decreasing compared to 2024 and by 6% compared to 2023, attributed to shift of teams from ILK site to Aspire site.

Brussels site: as the office space area is increased and the data provided by landlord are more accurate it is not relevant to compare with previous years.

Aspire site: the site was added to the reporting scope for the first time in 2025.

The ratio of electricity consumption by employee in 2025 increased overall by 38.4% compared to 2024 and by 58% compared to 2023, mainly due to the implementation of new equipment and operational changes across eu-LISA sites.

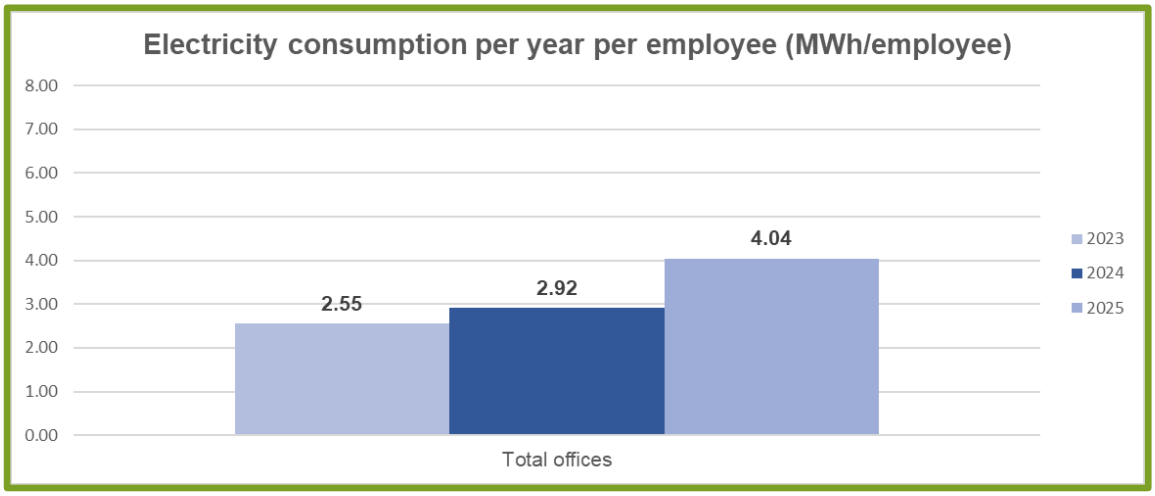

Figure 3 - Electricity consumption for office per employee, and per year

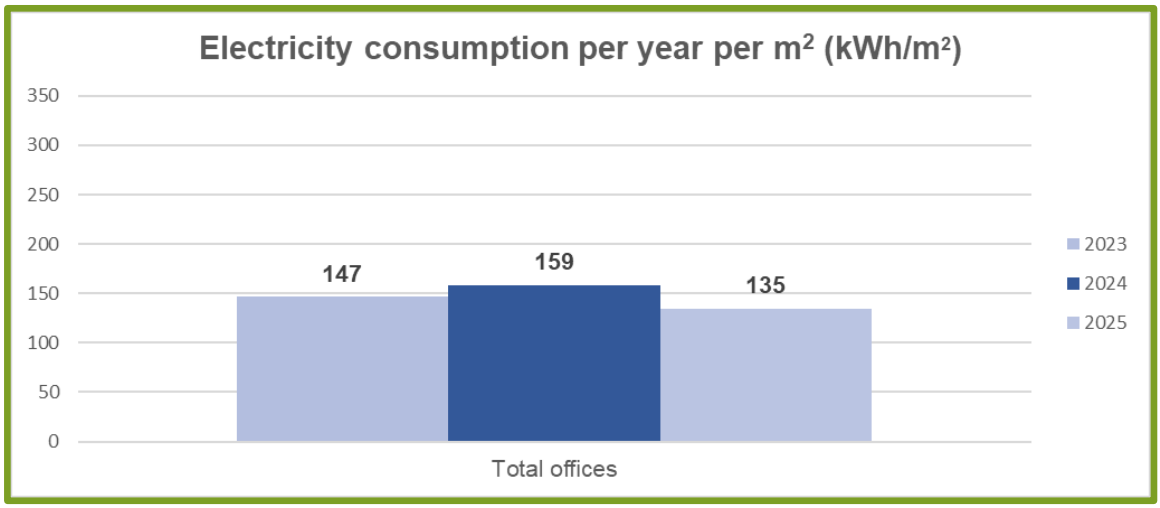

Figure 4 - Electricity consumption for office per m², and per year

In analysing the electricity consumption per m^2 and per site, the results are quite different with a decreasing by 15% compared to 2024 and by 8% compared to 2023 and can be explained by the fact than new eco-designed rented buildings are more performant in term of energy efficiency.

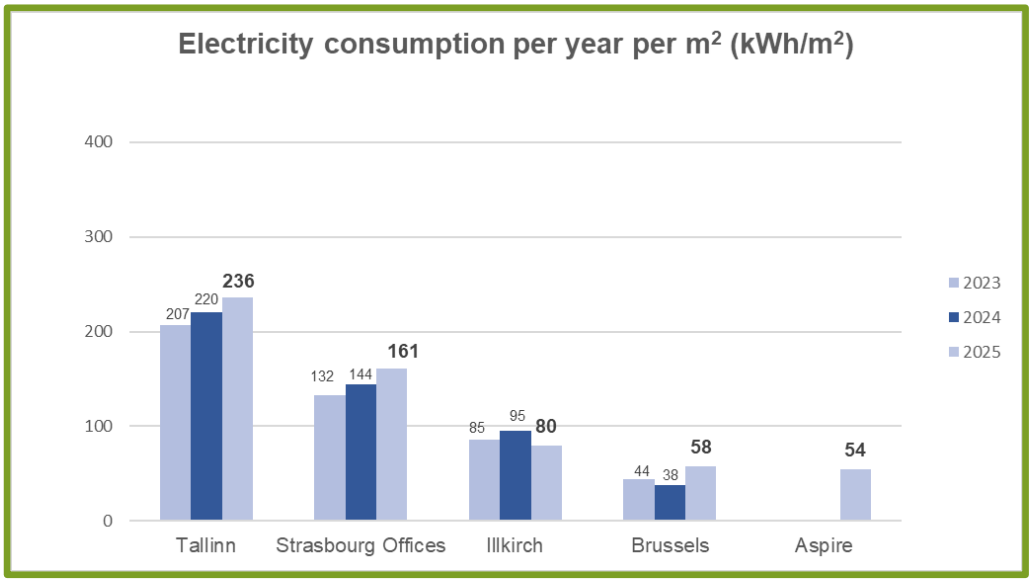

Figure 5 - Electricity consumption for office in buildings, by site and per m²

In analysing the electricity consumption per employee and per site, the results are quite similar for Tallinn, Strasbourg offices and Illkirch-Graffenstaden sites, to the global data on electricity consumption.

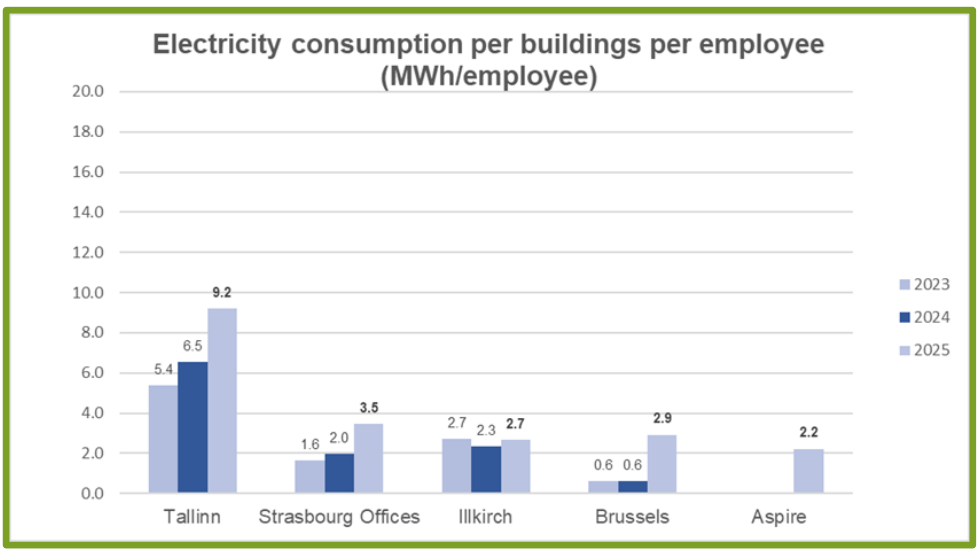

Figure 6 - Electricity consumption for office in buildings per site and employee

6.2. Energy efficiency in the Data Centre

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 9 – 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.

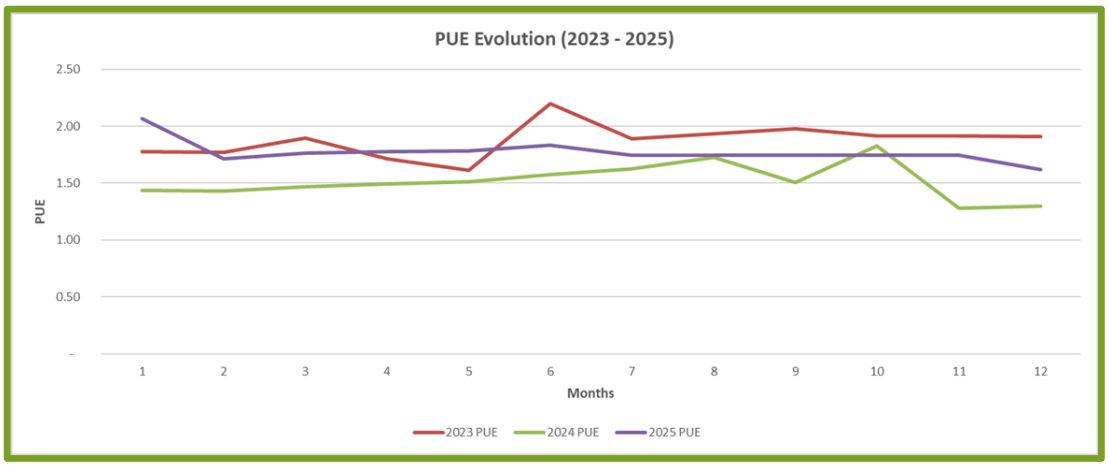

Figure 7- PUE evolution of Strasbourg main DC

The trend of PUE value decrease at the end of 2025's year main decrease because of removing of cable in ceiling and transfer of activity related to pre-programming from DC to MDC1.

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
Energy audit and DC green study provided several improvement actions to be implemented	Done	NA
Optimization of cooling system was done in increasing temperature setpoint of cold-water loop	Done	NA
Implementation of Sub-metering to measure an accurate PUE value	Not started	Q3 2026
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 and budget constraints	2028
Phase - 2 Implementation of Geothermal Energy to improve the DC energy performance and cooling availability (1 Well)	A study in Progress.	2026

Table 10 – 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).

The findings of this analysis related to energy efficiency in Data Centres, 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 and in Aspire, in addition to electricity consumption, district heating is in use. There is no district heating used for SXB, ILK and BXL sites.

In Tallinn site, the trend of district heating consumption decreased since 2023 for global consumption and by employee, thanks to optimization performed in HVAC system by means of current Building Management System (BMS) and a warmer climate, reflected in a 3% decrease in heating-degree days. In Aspire site, building was used from May 2025 and a comparison will be performed in 2026.

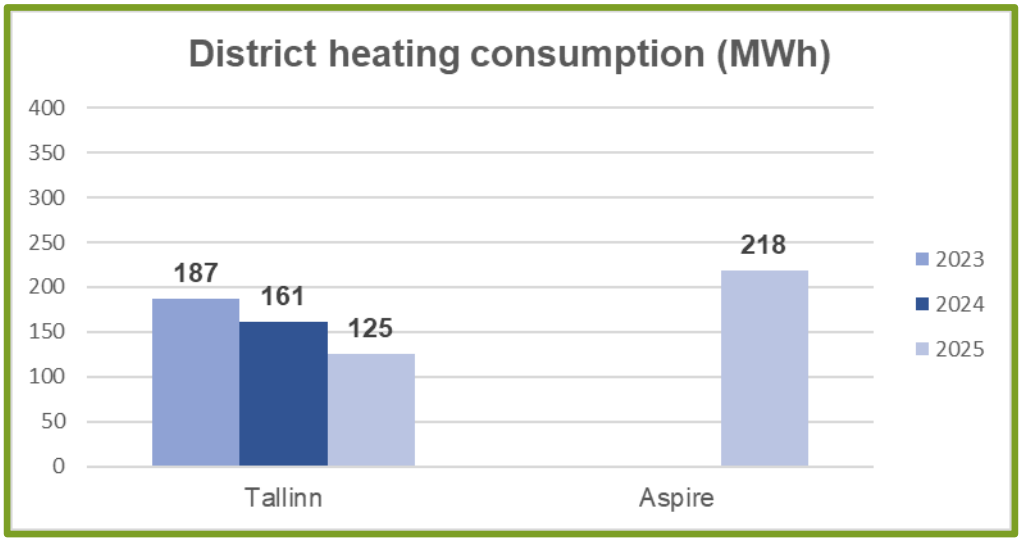

Figure 8 – District heating consumption (MWh)

In Tallinn site, the ratio of district heating to area, remain stable.

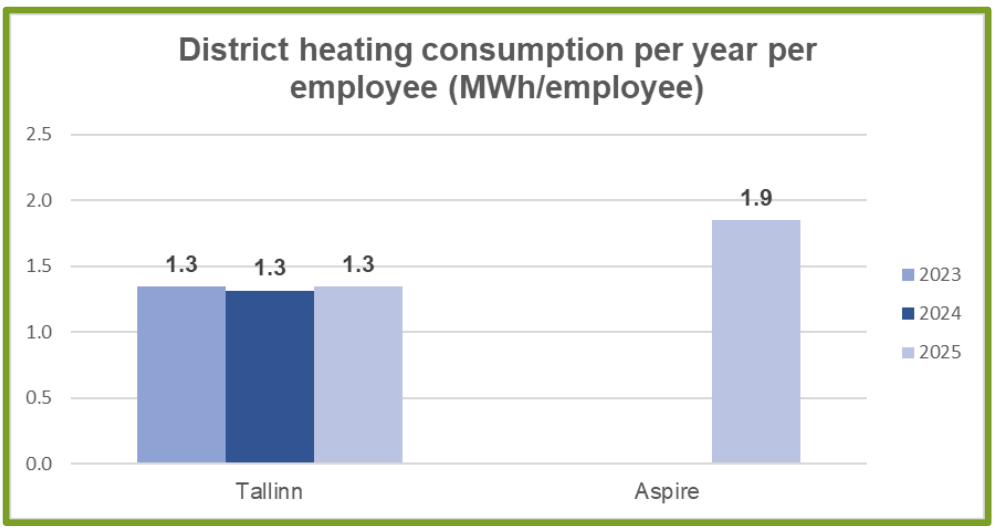

Figure 9 – District heating consumption per year per employee (MWh/employee)

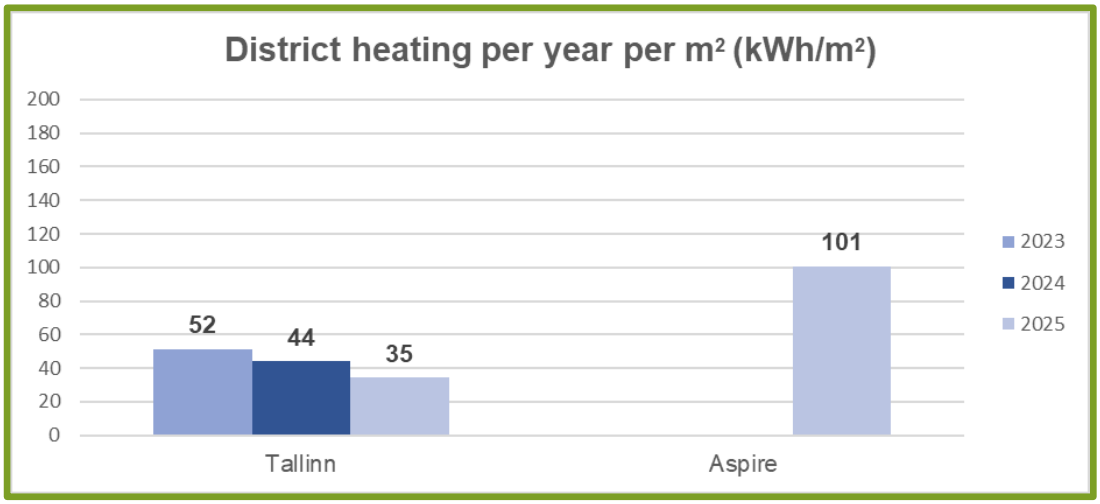

Figure 10 – District heating consumption per year per area (MWh/m²)

In analysing the district heating consumption per area, the results are quite different with a decreasing by 20% compared to 2024 and by 33% compared to 2023 as explained at the beginning of paragraph.

6.3. District cooling

In Aspire site, building was used from May 2025, and a comparison will be performed in 2026.

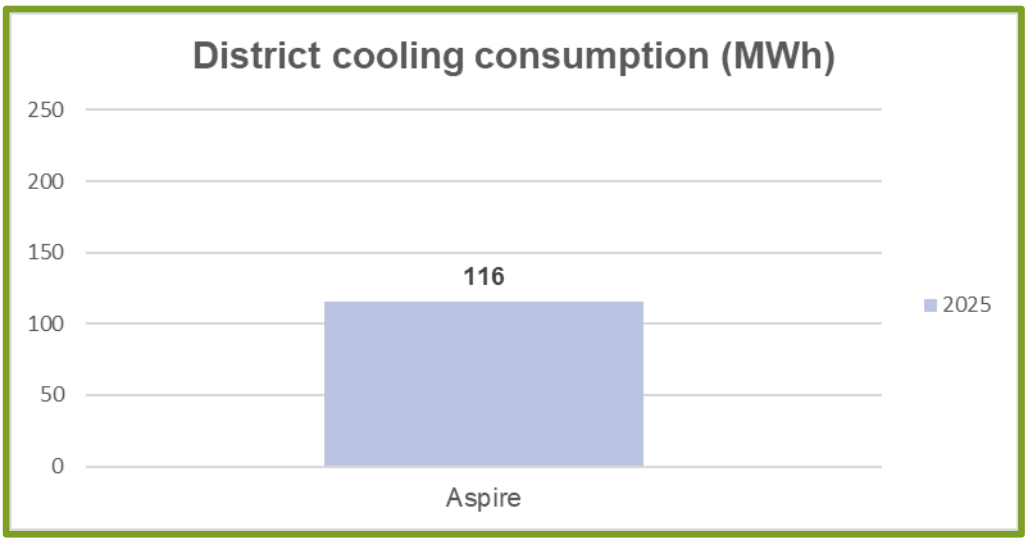

Figure 11 – District cooling consumption per year (MWh)

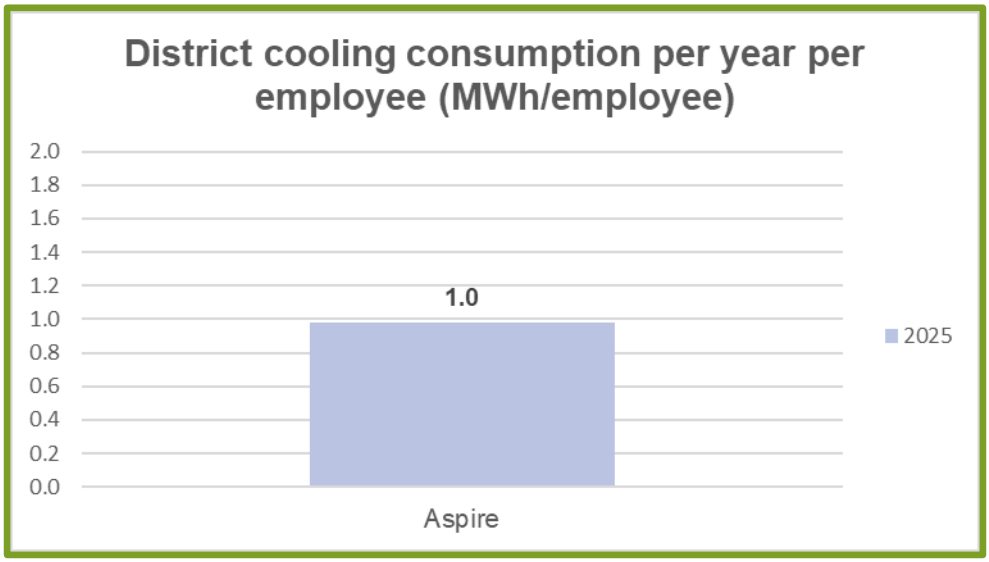

Figure 12 – District cooling consumption per year per employee (MWh/employee)

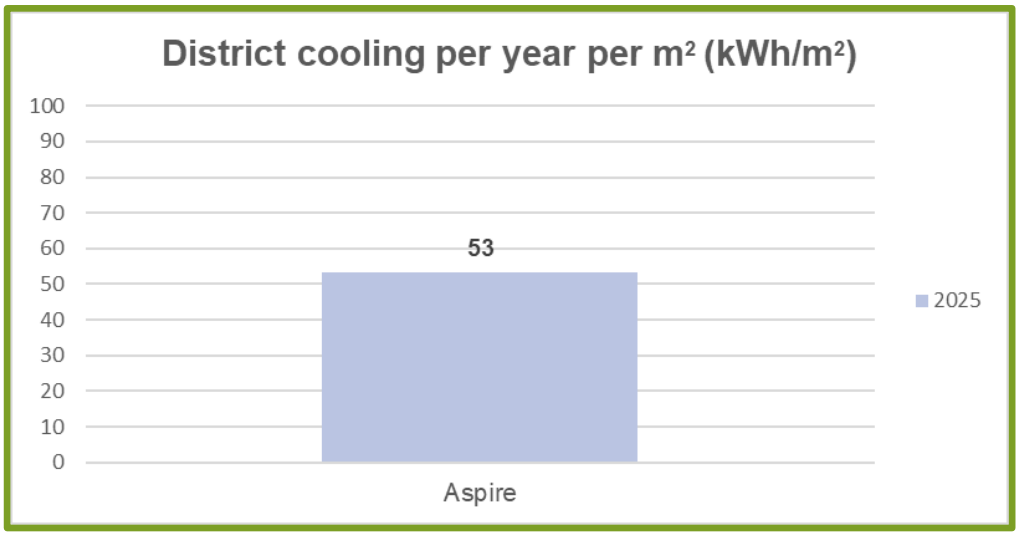

Figure 13 – District cooling consumption per year per area (MWh/m^2)

6.4. Global energy consumption

At eu-LISA, various energy sources are used, including electricity, district heating, and district cooling, some of which are supplied from renewable sources. In addition, for the TLL, SXB, ASP, and ILK sites (since August 2025), dedicated green electricity contracts have been purchased to ensure that an amount of renewable electricity equivalent to eu-LISA's consumption is injected into the grid. This is verified through Guarantees of Origin certificates, which provide assurance of the renewable origin of the electricity.

See details in Table 11 below:

Sites	Source of energy	Kind of energy	Details
TLL	Electricity	Renewable	Green certificate (100%)
	District heating	Renewable	Wood chips (80%),
		Non-renewable	Natural gas (20%),
SXB	Electricity	Renewable	Green certificate (100%)
ILK	Electricity	Non-renewable and renewable	Renewable (4.7%), fossil (8.8%), nuclear (86.5%)
		Renewable	Green certificate (100%) since August 2025
BXL	Electricity	Non-renewable	No data available
Asp	Electricity	Renewable	Green certificate (100%)
	District heating	Renewable	Fuel wood (38.92%); Other network (35.42%)
		Non-renewable	Natural gas (25.66%)

Table 11-Details of energy supply

The global renewable energy consumption of the Agency represents 98.54 %. See details in figures below:

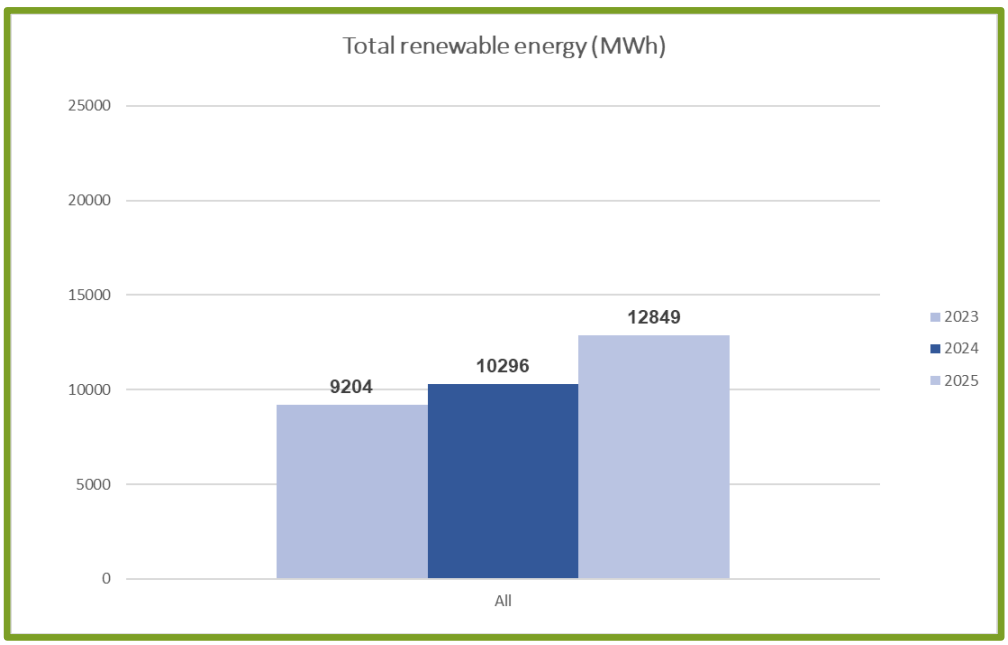

Figure 14 - Total renewable energy consumption per year (MWh)

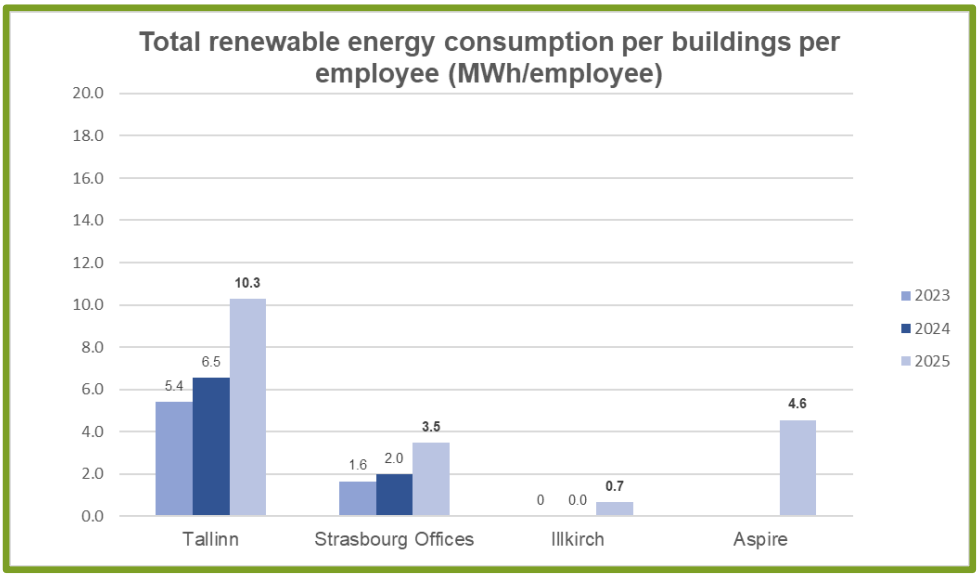

Figure 15- Total renewable energy consumption per site and per employee

It remains 1.46% for non-renewable energy which concerns electricity supply for the Liaison office and the Ilkirch-Graffenstaden site (from January to July 2025). District heating in Tallinn site contains 20% of non-renewable sources.

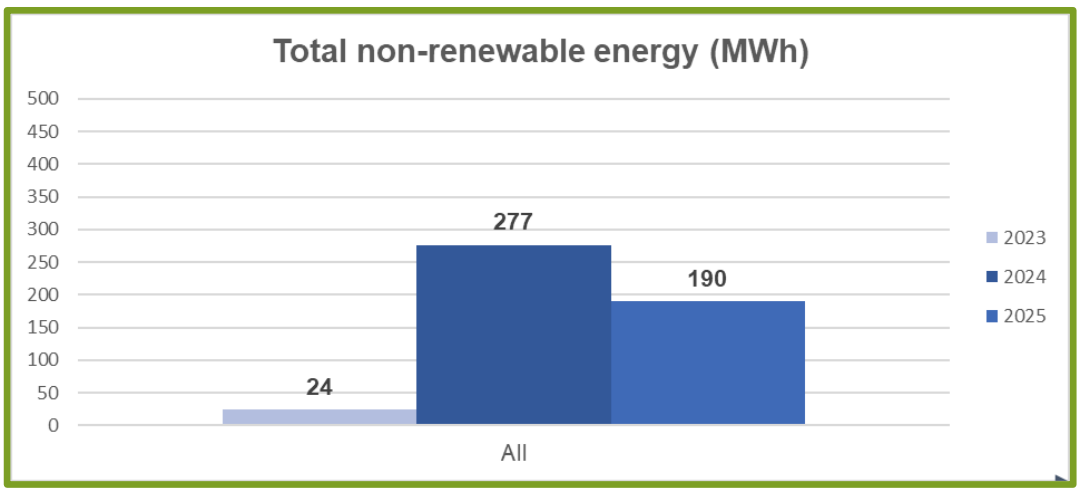

Figure 16 - Total non-renewable energy consumption per year (MWh)

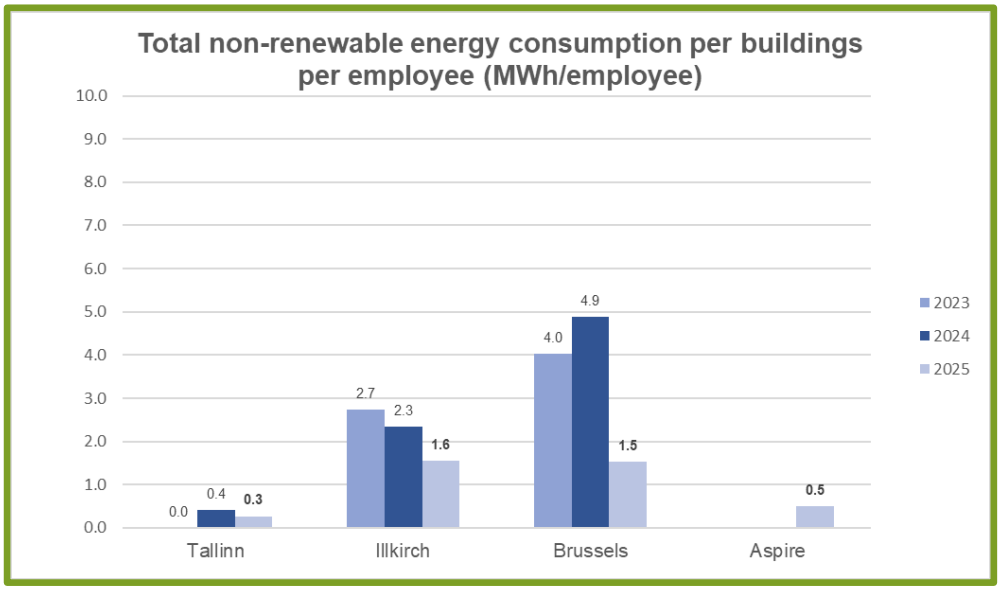

Figure 17- Total non-renewable energy consumption per site and per employee

6.5. 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 12:

Site	Kind of wastes	Providers	Data
TLL	Glass, Paper-Cardboard, plastic/metal, paper, mixed waste, biowaste,	City service providers	Accurate data
SXB	Metal, wood, glass, paper-cardboard, plastic, cardboard, mixed waste, biowaste, copper cables, recovery waste, electrical and electronic devices (W3E), Battery	Sub-contractors	Accurate data
ILK	Metal, glass, paper-cardboard, plastic, mixed waste, biowaste,	Sub-contractors	Accurate data
BXL	Glass, paper-cardboard, plastic/metal, mixed waste	Sub-contractors	Based on estimation
Asp	Metal, wood, glass, paper-cardboard, plastic, mixed waste, biowaste,	Sub-contractors	Accurate data

Table 12-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. Initiatives focused on further optimizing waste management practices and adopting circular economy principles in line with the EU's sustainability goals were done.

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

In Brussels, the landlord provides a waste register for all the building, then a ratio of 0.6 related to area occupied by the liaison office compared to all building is applied.

In French sites (SXB, ILK, Asp), the waste is collected by an external service provider, which provides waste register on monthly basis with detail on the quantity of waste collected by building.

In Table 13 the data are given on waste generated at each site in 2025.

2025	Strasbourg	Illkirch	Tallinn	Brussels	Aspire
Non-Hazardous waste (T)					
Metal	1.53	0.14			0.54
Wood	1.97				1.34
Glass	4.38	0.88	0.36	0.02	0.98
Paper/Carboard	2.94	1.70	0.82	0.71	4.51
Plastic waste	3.50	0.08			0.38
Plastic/metal waste			0.05	0.13	
Paper			0.17		
Cardboard	0.10				
Green waste	0.00	0.00	0.00	0.00	0.00
Mixed waste	16.98	5.24	3.76	0.23	8.35
Bio waste	2.67	2.29	1.88		0.39
Copper cables	0.10		0.00		
Recovery waste	2.72				
Hazardous waste (T)					
W3E	6.42		0.00		0
Battery	0.06	0.00	0.00		0
Aerosol	0.00	0.00			0
Total	43.4	10.3	7.0	1.1	16.5
% Waste/total	55%	13%	9%	1%	21%
Non-hazardous waste	85%	100.0%	100.0%	100.0%	100.0%
Hazardous waste	15%	0.00%	0.00%	0.00%	0.00%
Employee	293	62	93	6	118
Waste/employee (kg/employee)	148	166	76	182	140

Table 13 -Total waste production in 2025 per eu-LISA buildings (estimate for BRU site)

In 2025, waste generation per employee increased by 13% compared to 2023 and increased three times compared to 2024. This variation is primarily due to improved accuracy in waste quantification reported by the external service provider. In addition, the inclusion of an additional building in the 2025 reporting scope contributed to the increase. Finally, the replacement of several servers and IT racks generated additional e-waste, as well as associated cardboard and plastic packaging waste.

Based on these results, the annual waste generated per employee is 148 kg/employee at the Strasbourg site and 166 kg/employee at the Illkirch-Graffenstaden site. For the Tallinn, Brussels, and Aspire sites, the corresponding figures are 76 kg/employee/year, 182 kg/employee/year, and 140 kg/employee/year, respectively. All of these values are below the sector benchmark of 200 kg per full-time equivalent (FTE) per year.

In 2025, eu-LISA introduced enhanced waste management practices aimed at increasing material recovery rates and improving waste sorting through clearer bin labelling across its sites. In parallel, several dedicated awareness sessions and workshops on waste management were organised to strengthen staff engagement and promote sustainable practices in the workplace.

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

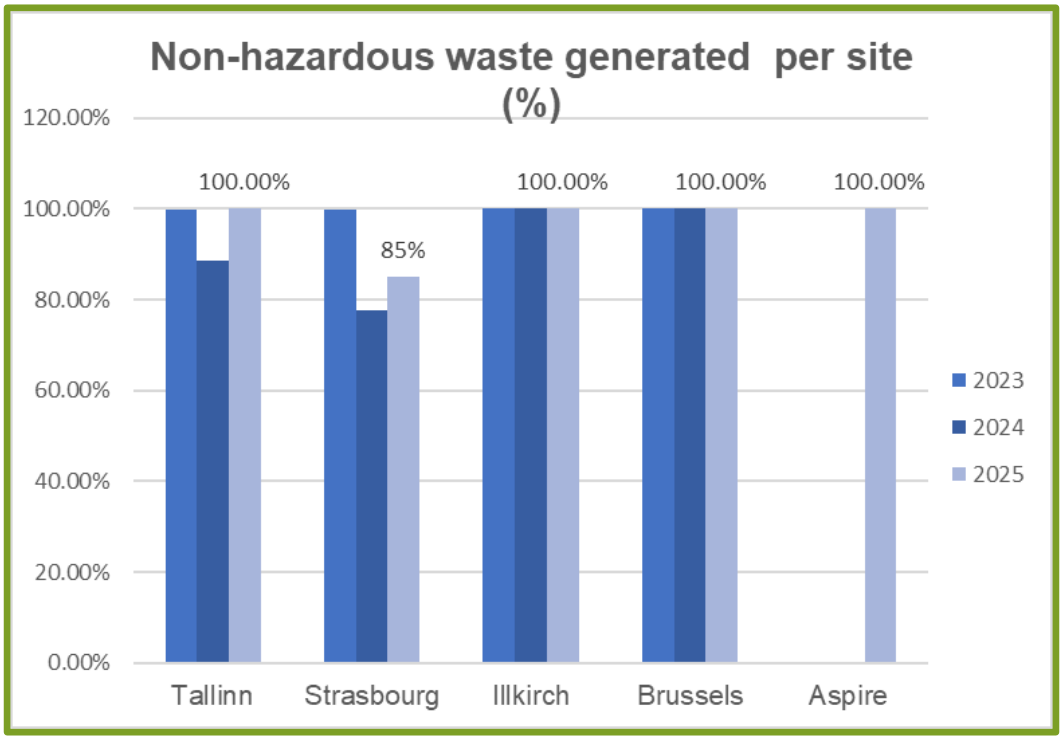

Figure 18 – Non-hazardous waste generated per site (%)

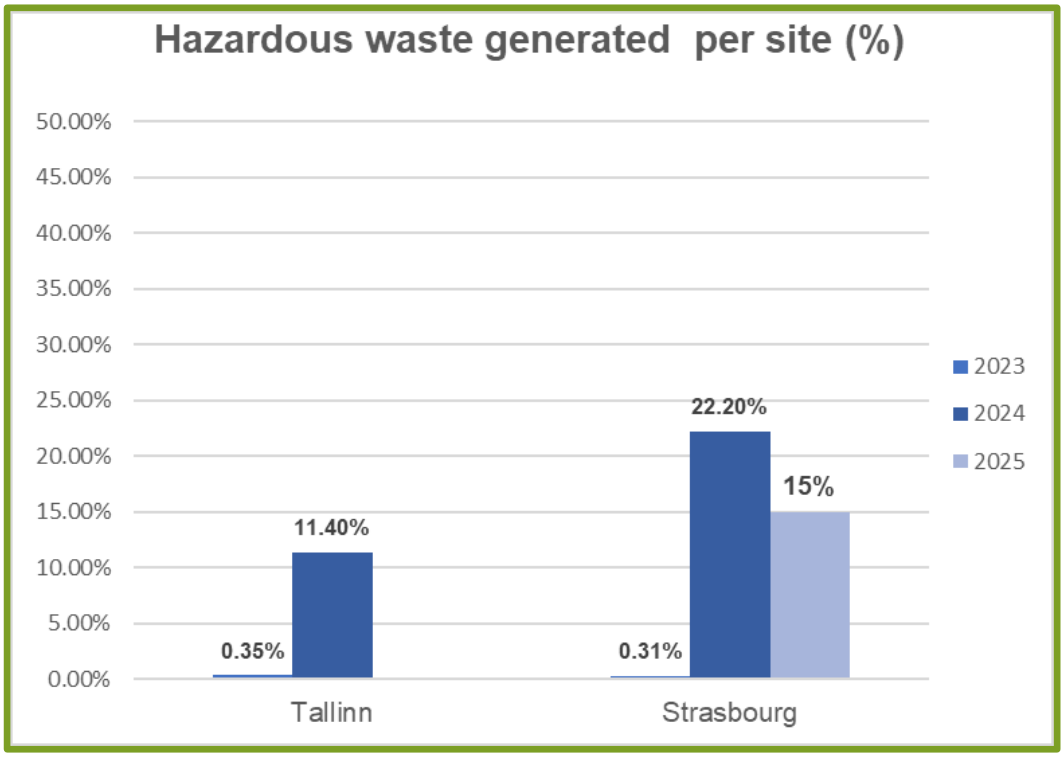

Figure 19 – Hazardous waste generated per site (%)

6.6. Water

Water is supplied by local municipalities and is used at eu-LISA premises for sanitary facilities and kitchen areas. At the Strasbourg site, water is also used in the Data Centre cooling system, which operates through a closed-loop process.

In 2025, total water consumption amounted to 3,703 m³. Water consumption data for all sites are based on meter readings. For the Brussels site, a factor of 0.6 is applied, as the consumption data provided by the landlord relates to the entire building rather than solely to eu-LISA's occupied area.

In 2025, water consumption per employee increased at the Tallinn and Strasbourg sites. This increase may be attributed to higher occupancy levels and a greater number of visitors across the sites. In contrast, the ratio decreased at the Illkirch-Graffenstaden site, as most employees relocated to the new Aspire building, resulting in progressively lower occupancy throughout the year.

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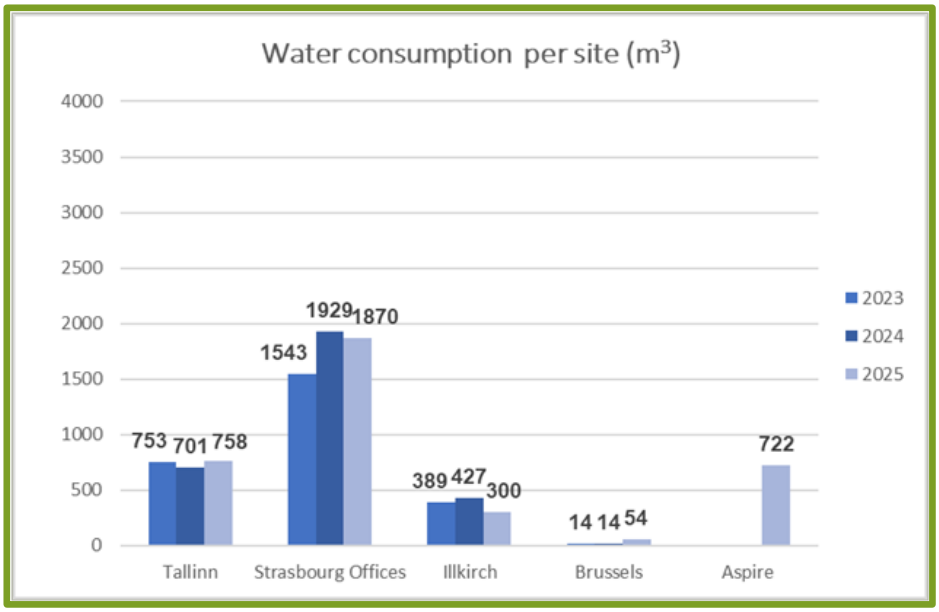


Figure 20 – Annual water consumption per site

The water consumption at eu-LISA per employee per year is 6.9 m³ which is above the sectoral reference data (6.4 m³/FTE), taking into account that in the calculation we have included the water used for cooling the Data Centre. Regarding the new Brussels Liaison office, the value isn't relevant because number of visitor didn't consider in calculation because of missing data.

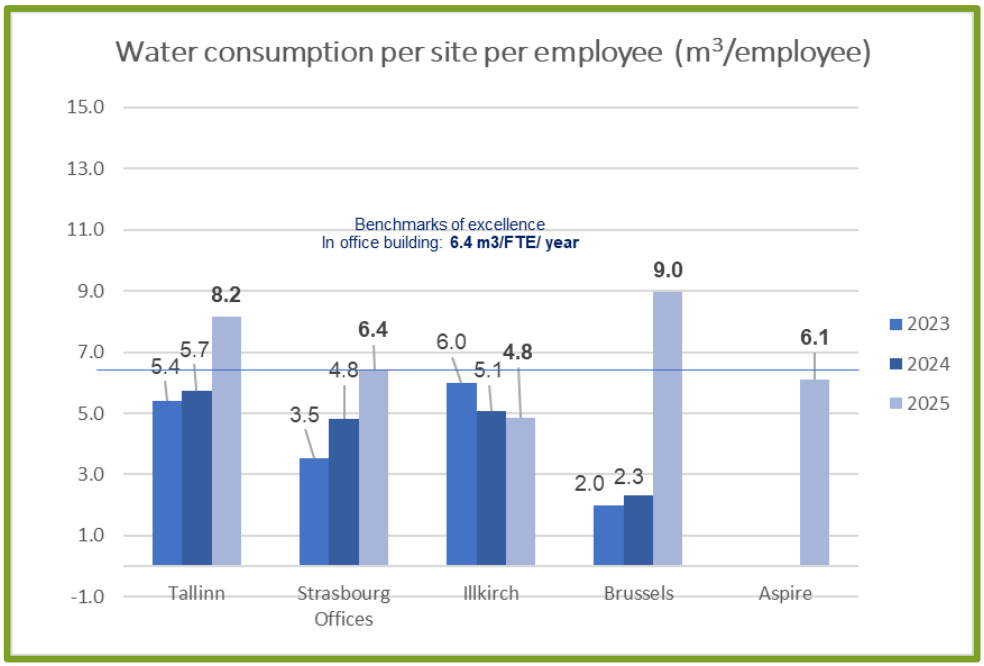


Figure 21 – Annual water consumption per site per employee

6.7. Material efficiency: paper

In 2025, material efficiency data only covers paper consumption.

Paper consumption is monitored and calculated annually for all sites. The corresponding data are presented in the graph shown in Figure 22.

To promote resource efficiency, printers at all sites are configured by default to print double-sided and in black and white.

Based on the 2025 results, targets will be established for the coming years. The objective is to increase employee awareness of paper consumption and encourage more responsible printing practices, ultimately reducing overall paper usage across the Agency.

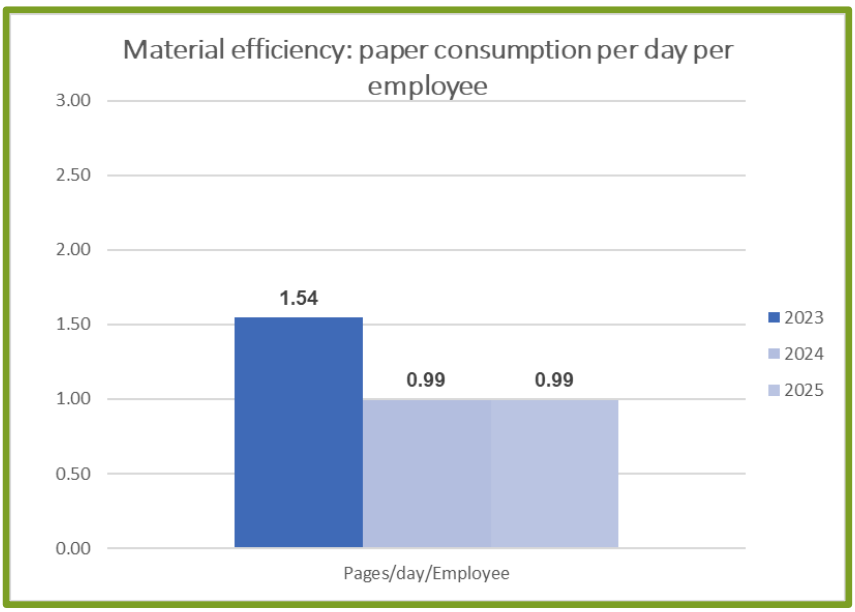


Figure 22 – Material efficiency: paper consumption per day per employee

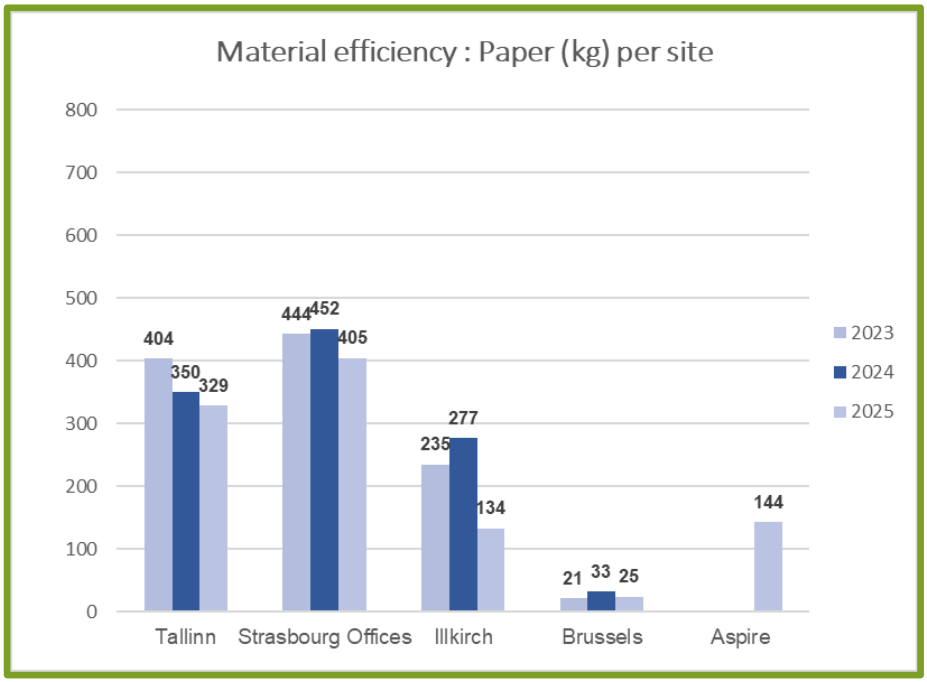


Figure 23 – Material efficiency: paper consumption (kg) per site

In accordance with the Sectoral Reference Document for Public Administration, eu-LISA's paper consumption remains below the benchmark value of 15 sheets of paper per full-time equivalent (FTE) per working day.

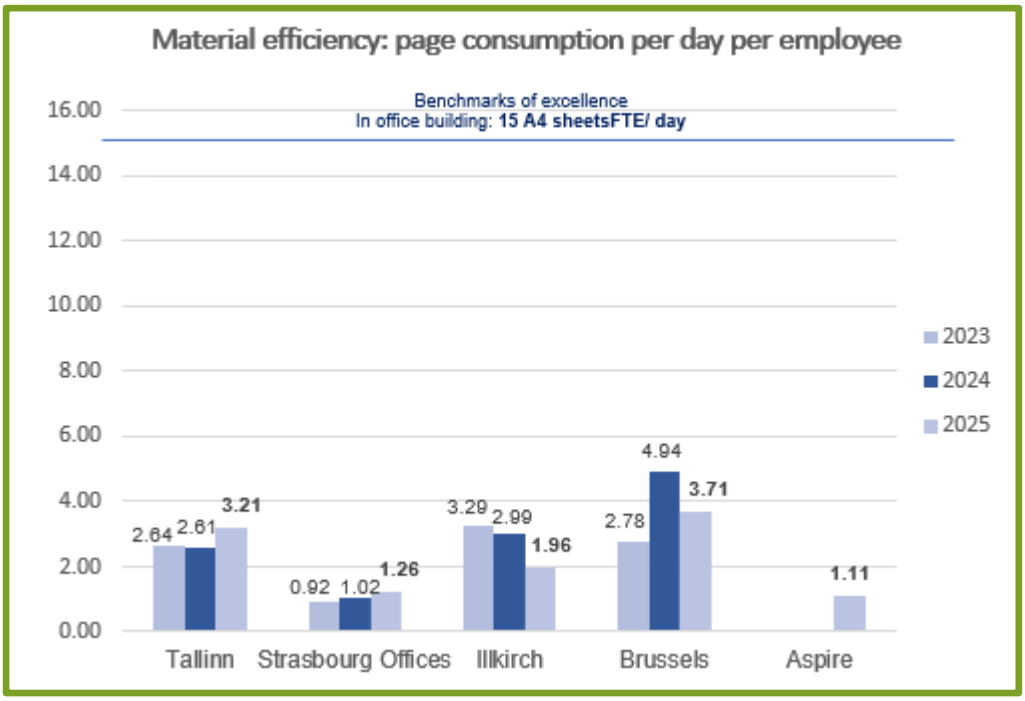


Figure 24 – Material efficiency: paper consumption per site per day per employee

In 2026, the material efficiency performance will be enhanced by adding percentage of IT hardware purchased that meet specific environmental criteria (for example, the EU Ecolabel, Energy Star, etc.) which was defined in EDD-112 on Green Public Procurement policy.

6.8. Travel emissions

The Agency uses the MIPS+ tool to manage and book business travel for staff. The tool also enables the estimation and monitoring of the carbon footprint associated with all staff travel.

Table 14 presents the number of business trips and the corresponding CO_2 emissions for the years 2023, 2024, and 2025 across all sites.

Total CO_2 emissions from business travel amounted to 71 tonnes in 2025, representing a 47% reduction compared to 2024 (134 tonnes) and a 76% reduction compared to 2023 (294 tonnes).

	2023	2024	2025
Estonia	173	66	36
France	114	58	33
Belgium	7	10	2
TOTAL	**294**	**134**	**71**

Table 14 - TeqCO_2 emissions in tons related to travel emissions

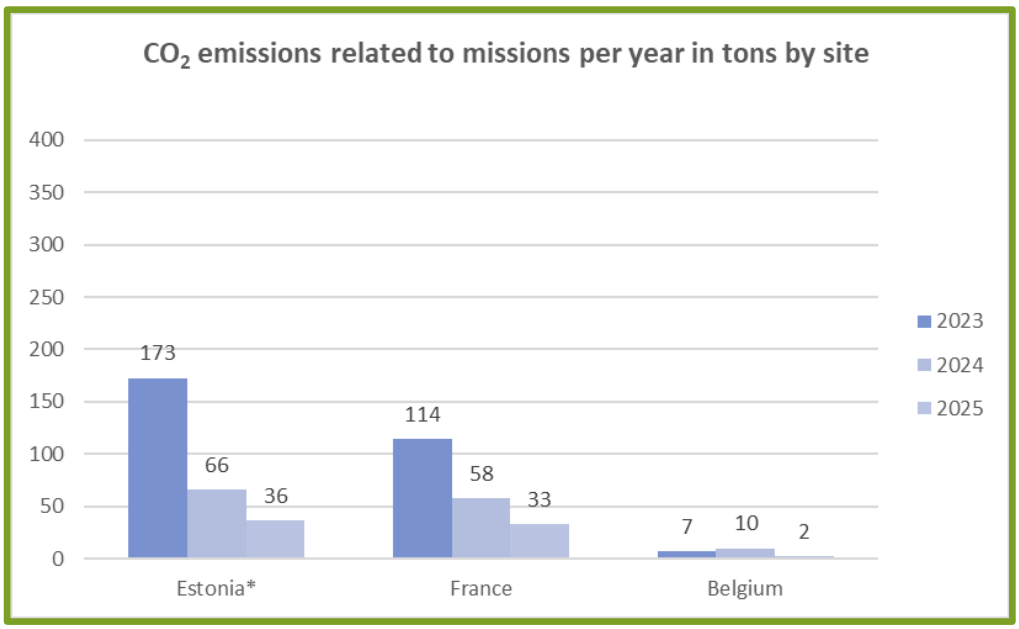


Figure 25 - TeqCO_2 emissions related to travel emissions per year in tons

eu-LISA considered it valuable to analyse the distribution of its carbon footprint by mode of transport, as presented in Figure 26.

In 2025, although air travel continued to account for a significant share of business travel, a notable increase was observed in the use of rail and bus transport. The continued reliance on air travel is largely due to the geographical location of the Agency's headquarters and operational sites, which require frequent travel to and from the European institutions located in Brussels and Strasbourg.

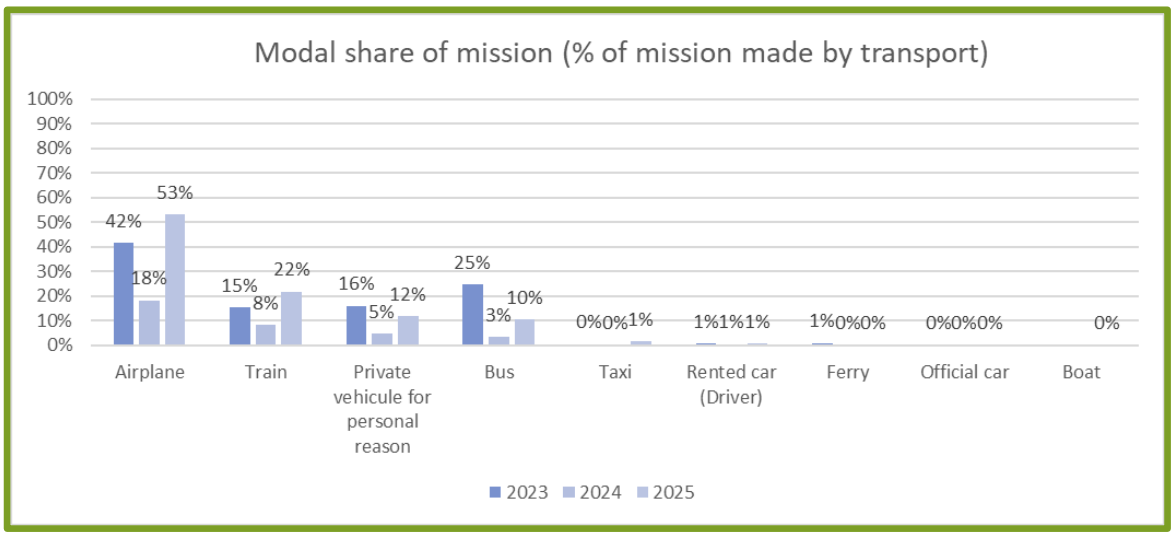


Figure 26 - TeqCO$_2$ emissions per type of transport in tons

Consequently, to reduce eu-LISA's carbon footprint, leverage actions will be introduced to decrease the number of travel-related emissions (Figure 27), without restricting transport modes, as access to the headquarters requires the continued use of air travel.

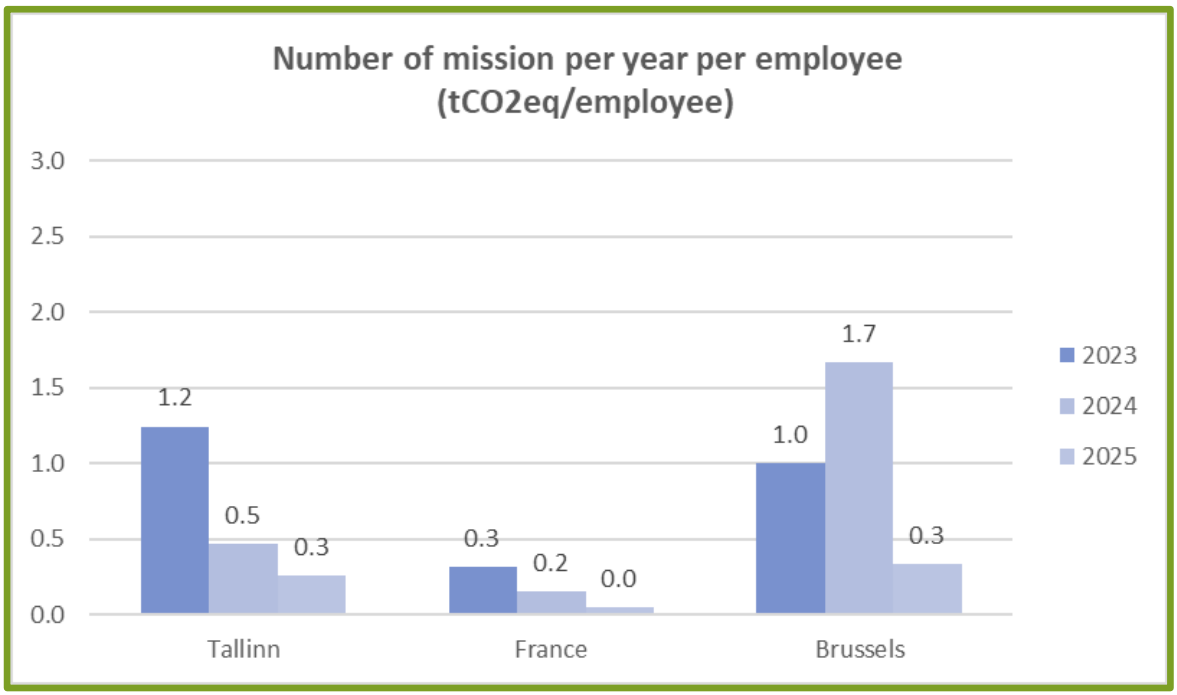


Figure 27 - Number of travel emissions per year per employee (TCO$_2$eq/employee)

In 2024, eu-LISA introduced new greening rules for missions and authorised travel to reduce employee travel. This approach aims to ensure that all staff are aware that video conferencing facilities are available and actively encouraged as an alternative to travel whenever appropriate.

In addition, updated guidelines on missions and authorised travel, including green travel principles, were published by the European Commission.

6.9. 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 15 below.

Biodiversity indicator (Total of)	2023-2024		2025
	m²	m²/empl.	m²/empl.
Use of Land	3627	26	39
Sealed Area	2107	15	23
Nature-Oriented Area on Site	2260	16	24
Nature-Oriented Area Off-Site	0	0	0

Table 15 – Biodiversity indicator for Tallinn site

In Strasbourg, green areas represent 60% of the global area, which are located outside of sealed area. Biodiversity indicators are detailed in table 16 below.

Biodiversity indicator (Total of)	2023-2024		2025	
	m²	m²/empl.	m²	m²/empl.
Use of Land	16625	38	35683	122
Sealed Area	7842	18	10675	36
Nature-Oriented Area on Site	7296	17	21315	73
Nature-Oriented Area Off-Site	0	0	0	0

Table 16 – Biodiversity indicator for Strasbourg site

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

Biodiversity indicator (Total of)	2023-2024		2025
	m²	m²/empl.	m²/empl.
Use of Land	2074	32	33
Sealed Area	2074	32	33
Nature-Oriented Area on Site	0	0	0
Nature-Oriented Area Off-Site	0	0	0

Table 17 – Biodiversity indicator for Illkirch-Graffenstaden site

For Brussels site, it's only an office rented building, so biodiversity indicators are detailed in table 18 below.

Biodiversity indicator (Total of)	2023-2024		2025	
	m²	m²/empl.	m²	m²/empl.
Use of Land	98	14	305	51
Sealed Area	98	14	305	51
Nature-Oriented Area on Site	0	0	0	0
Nature-Oriented Area Off-Site	0	0	0	0

Table 18 – Biodiversity indicator for Brussels site

For Aspire site, it's only an office rented building, so biodiversity indicators are detailed in table 19 below.

Biodiversity indicator (Total of)	2025	
	m²	m²/empl.
Use of Land	4830	41
Sealed Area	4830	41
Nature-Oriented Area on Site	0	0
Nature-Oriented Area Off-Site	0	0

Table 19 – Biodiversity indicator for Aspire site

6.10. Impact on climate: GHG emissions

As part of its commitment to environmental sustainability, eu-LISA has begun systematically measuring its direct greenhouse gas (GHG) emissions in order to better understand, monitor, and reduce the environmental impact of its operations. This approach supports the EU's climate objectives and reinforces the Agency's commitment to responsible and sustainable operational practices.

eu-LISA started calculating CO_2 emissions in 2020, initially covering electricity consumption and business travel, and not accounting for the use of green electricity.

Since 2023, eu-LISA has implemented a dedicated platform for greenhouse gas (GHG) emissions calculation, supported by specialised external consultants. This initiative represents a significant step forward in strengthening the Agency's carbon footprint assessment methodology and improving the accuracy and reliability of emissions reporting. Annex III illustrates how the use of a dedicated GHG calculation tool has enhanced the accuracy of the results.

Emissions are now calculated using the Aktio tool, which is based on the GHG protocol[12] for all three scopes.

Since the carbon emissions calculation methodology is based on the GHG Protocol, Scope 2 emissions can be calculated using two approaches: the location-based method and the market-based method.

The location-based method reflects the carbon emissions associated with the electricity grid supplying the physical electricity consumed on site.

The market-based method reflects the emissions associated with the organization's electricity procurement, taking into account the electricity supply contract and any applicable Guarantees of Origin (GoOs) or other contractual instruments.

Based on these two approaches, in 2025, the Agency's carbon footprint amounted to:

- Location-Based: 7761 tCO_2e, corresponding to 8.9 tCO_2e per employee.
- Market-Based: 6459 tCO_2e, corresponding to 7.5tCO_2e per employee.

The objectives for the coming years are:

- To include, where possible, the impact of visitor and customer transportation in the calculations
- To improve data accuracy to better assess the carbon footprint of IT equipment (software and hardware)

[12] **GHG protocol**

Following this kind of emission, a specific conversion factor following data source detailed in Table 20 below:

Building	Category	Poste	Source of data
All	Energy and fluid	Electricity	Base Ecoinvent
TLL	Energy and fluid	District heating	Certificate 2024 from provider utilitas
Aspire	Energy and fluid	District heating, district cooling	france-chaleur-urbaine.beta.gouv.fr
SXB	Energy and fluid	Air conditioning (leakage)	Incident report
SXB	Energy and fluid	Fuel (emergency generator)	Base carbone Ademe
SXB, TLL	Digital IT	Servers and appliances,	HPE
SXB, TLL	Digital IT	switches & firewalls, screens, smartphones,	Base carbone Ademe
SXB	Digital IT	Other servers accessories	HPE
SXB, TLL, BXL	Digital IT	Other electronic devices, laptops	Base carbone Ademe
SXB	Digital IT	Software licences	Base carbone Ademe
All	Miscellaneous purchases	Miscellaneous supplies & furniture	Base carbone Ademe
All	Miscellaneous fixed assets	Miscellaneous supplies & furniture	Base carbone Ademe
All	People transportation	Commuting	Base Empreinte-Ademe
All	People transportation	Non-operated business travel	Outil MIPS (tool)
All	Waste and waste water	Waste (WEEE, mixed waste, biowaste, wood, metal)	Base Empreinte-Ademe
All	Waste and waste water	Waste (glass, plastic waste, paper/cardboard)	ABC (*Association pour la transition Bas Carbone)*
SXB, TLL, BXL	Waste and waste water	Waste water	Base Empreinte-Ademe

Table 20-Source of data for conversion factor

From a scope perspective, Scope 3 represents the largest share of greenhouse gas emissions.

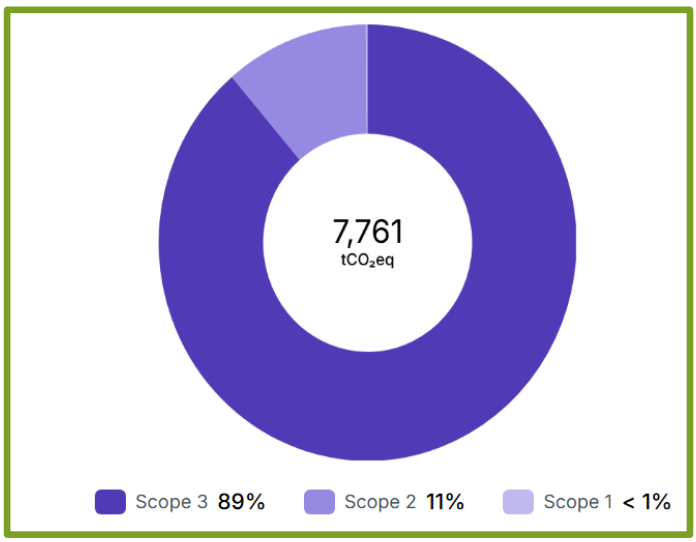


Figure 28- Overview results by scope

Scope 1: *direct emissions from refrigerant leakage*

represents less than 1% of eu-LISA's carbon footprint, due to refrigerant leakage of refrigerant gas occurred on SXB site in September 2025.

Scope 2: *indirect emissions from electricity and heating*

accounts for 11% of eu-LISA's carbon footprint, due to electricity, district heating, district cooling and fuel consumptions.

Scope 3: *indirect emissions from suppliers, commuting, and business travel*

remains the largest contributor at 89%. The top three sources of emissions are

- On-Site software licences,
- IT hardware,
- Other fixed assets (security devices, furniture and works).

When comparing eu-LISA sites, the operational site located in Strasbourg is the highest emitter of carbon dioxide equivalent, as shown in Figure 29.

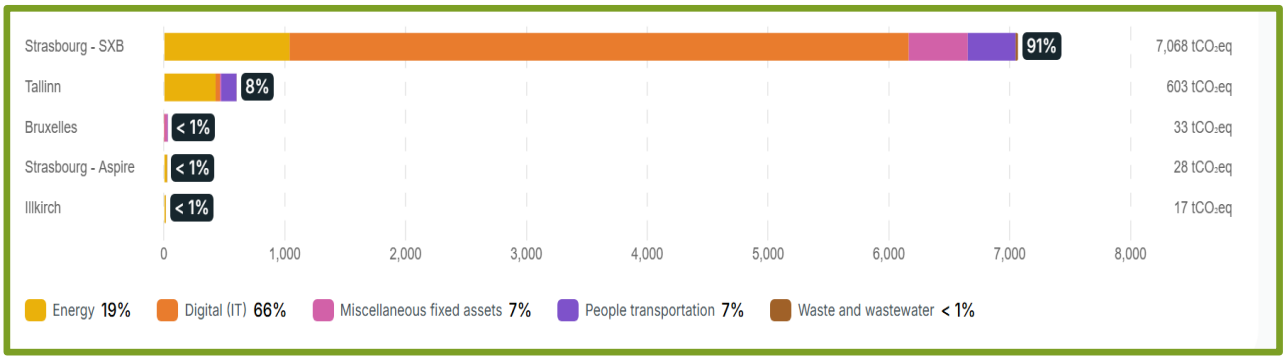


Figure 29- Overview results by sites

A more detailed breakdown by sub-category shows that on-site software licences represent the largest source of carbon dioxide equivalent emissions, as illustrated in Figure 30.

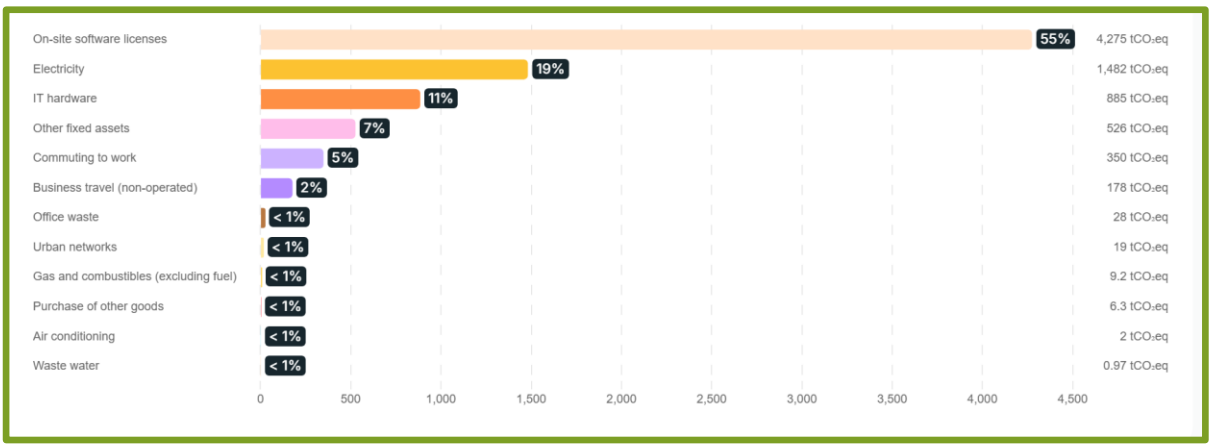


Figure 30- Overview results by sub-categories

During the review of previous assessments, it was identified that emissions associated with software licences had been underestimated in earlier carbon footprint calculations, as certain related expenses had initially been classified as wages. To address this issue, the calculation methodology was refined and improved in 2025. Consequently, the carbon footprint assessments for 2023 and 2024 were recalculated to ensure consistency, comparability, and greater accuracy of reported emissions data (figure 31).

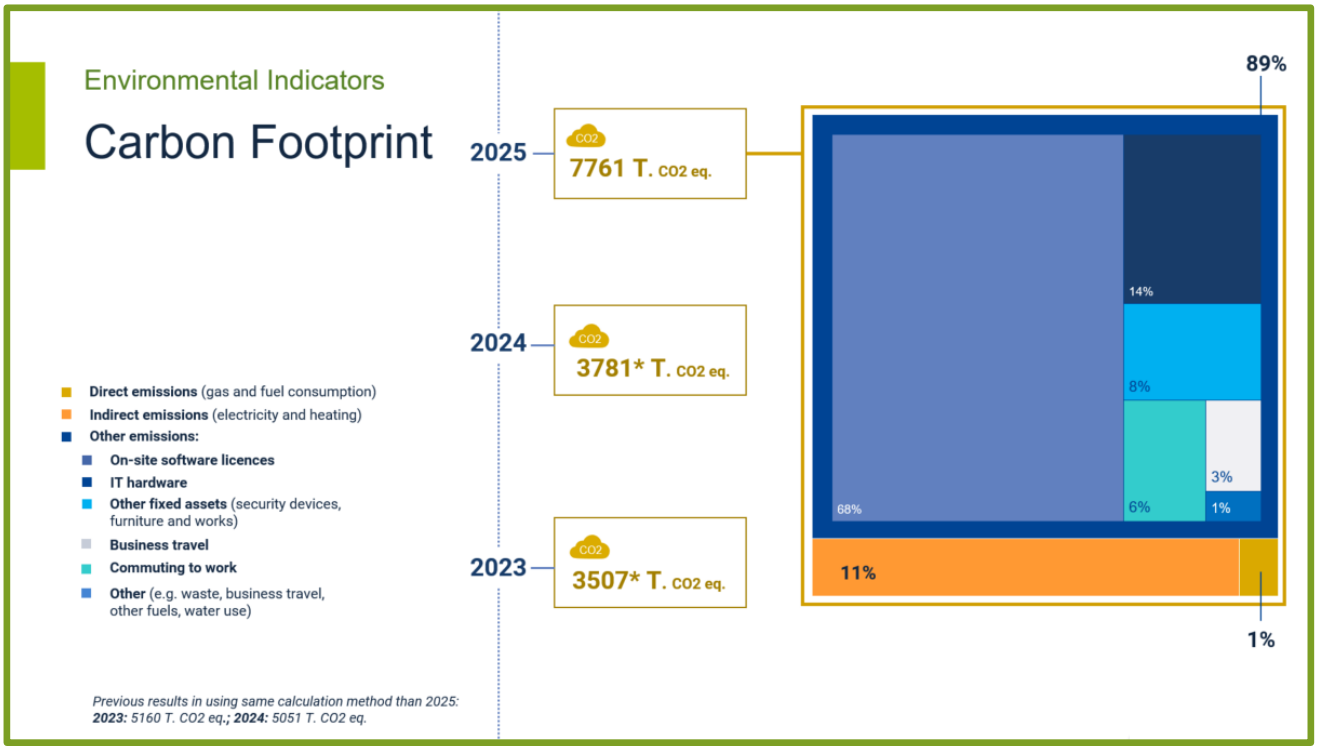


Figure 31- Reassessment of carbon footprint (location-based) value for 2023 and 2024

Compared to 2024, the Agency's carbon footprint (location-based value) increased in 2025 by 54% (figure 32).

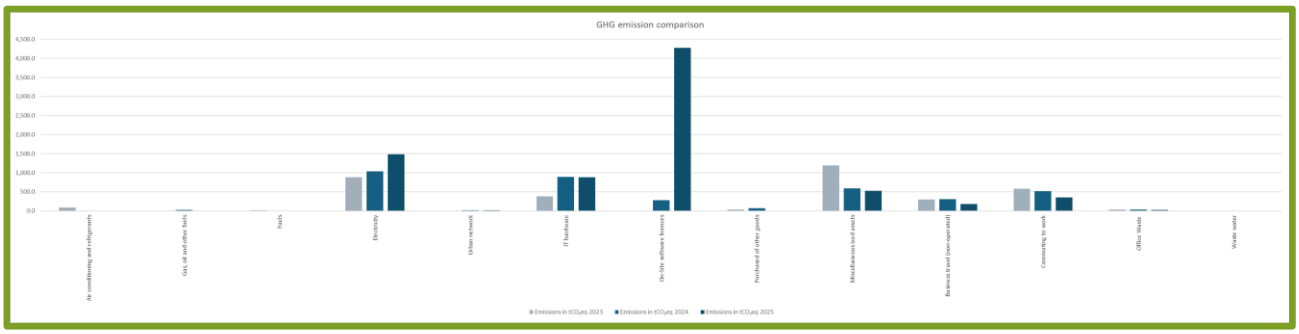


Figure 32- GHG emission comparison between 2023, 2024 and 2025

The increase is mainly driven by the purchase of IT licences and hardware, as well as the development of the new Aspire and Brussels office buildings. Prior to their occupation, furniture, ICT, and security equipment were procured, and various improvement works were carried out.

In addition, a new Modular Data Centre (MDC2.1) was implemented, while the existing parking capacity was expanded by 95 spaces. Modular Data Centre 1 was also used more extensively, alongside the procurement and use of several servers for pre-production activities.

Furthermore, the deployment of new large-scale projects and systems, including sBMS, VIS, and EES, had a significant impact on the Agency's carbon footprint. In parallel, the implementation of a new ICT strategy based on cloud adoption and Enterprise Content Management also contributed to an increase in Scope 3 emissions, particularly through the procurement of ICT software and related services.

To reduce the Agency's environmental footprint, a carbon neutrality strategy will be defined to achieve climate neutrality by 2030, in line with the ED decision endorsed under the EUAN Charter on the reduction of greenhouse gas emissions and responsible environmental management.

To reduce Scope 2 emissions, the Agency is improving the energy efficiency of its data centres. As a short-term measure, efforts were made to optimise the use of the existing cooling infrastructure. In the medium term, the Agency plans to implement a geothermal-based solution to reduce overall Power Usage Effectiveness (PUE), in compliance with EU guidelines on energy efficiency improvements.

To reduce Scope 3 emissions, Decision 112 of the Executive Director on the Green Public Procurement Policy entered into force on 25 November 2025, promoting more environmentally friendly procurement practices. Additional initiatives were also implemented to reduce commuting-related emissions, including bike rentals during May for the EU Velomai competition and in June for voluntary staff participation in the "AuBoulotAVelo" initiative organised by the City of Strasbourg. To reduce waste-related emissions, ICT equipment was donated to schools and furniture to charitable organisations where possible. Several awareness sessions on environmental topics were also organised to strengthen the Agency's environmental culture.

6.11. Summary of relevant environmental indicators:

In 2025, environmental performance of eu-LISA activities is summarised in Table 21 below:

Site	Topics	Environmental performance
TLL	Energy efficiency in building: electricity	9.2 MWh/employee 236 kWh/m^2
	Energy efficiency in building: District Heating	1.3 MWh/employee 35 kWh/m^2
	Renewable energy	10.3 MWh/employee
	Non-renewable energy	0.3 MWh/employee
	Waste	7.0 T (100% of Non-hazardous waste) 76 kg/employee
	Water	8.2 m^3/employee
	Material efficiency	3.21 Pages/Day/Employee 3.5 kg/employee
	Travel emissions	36 t CO_2 eq
	Biodiversity	Total use of land: 3627 m^2; 39$m^{2/}$employee Total sealed area: 2107 m^2; 23 $m^{2/}$employee Total nature-oriented area on site: 2260 m^2; 24 $m^{2/}$employee Total nature-oriented area off- site: 0 m^2; 0 $m^{2/}$employee
SXB	Energy efficiency in buildings: electricity	3.5 MWh/employee 161 kWh/m^2
	Renewable energy	3.5 MWh/employee
	Waste	43.4 T (85% of Non-hazardous waste; 15% of Hazardous waste) 148 kg/employee
	Water	6.4 m^3/employee
	Material efficiency	1.26 Pages/Day/Employee 1.4 kg/Employee
	Travel emissions	33 tCO_2 eq
	Biodiversity	Total use of land: 35683 m^2; 122$m^{2/}$employee Total sealed area: 10675 m^2 ; 36$m^{2/}$employee Total nature-oriented area on site: 21315 m^2; 73$m^{2/}$employee Total nature-oriented area off- site :0 m^2 ; 0$m^{2/}$employee

Site	Topics	Environmental performance
ILK	Energy efficiency in buildings: electricity	2.7 MWh/employee 80 kWh/m^2
	Renewable energy	0.7 MWh/employee
	Non-renewable energy	1.6 MWh/employee
	Waste	10.3 T (100.0% of Non-hazardous waste) 62 kg/employee
	Water	4.8 m^3/employee
	Material efficiency	1.96 Pages/Day/Employee 2.2 kg/employee
	Travel emissions	N/A (included in Strasbourg site)
	Biodiversity	Total use of land: 2074 m^2; 33 $m^{2/}$employee Total sealed area: 2074 m^2; 33 $m^{2/}$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	2.9 MWh/employee 58 kWh/m^2
	Energy efficiency in buildings: gas	4.1 MWh/employee 0.3 MWh/m^2
	Non-renewable energy	1.5 MWh/employee
	Waste	1.1 T (100.0% of Non-hazardous waste) 182 kg/employee
	Water	9.0 m^3/employee
	Material efficiency	3.71 Pages/Day/Employee 4.1 kg/employee
	Travel emissions	2 tCO_2 eq
	Biodiversity	Total use of land: 305 m^2; 51$m^{2/}$employee Total sealed area: 305 m^2 ; 51 $m^{2/}$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

Site	Topics	Environmental performance
Asp	Energy efficiency in buildings: electricity	2.2 MWh/employee 54 kWh/m^2
	Energy efficiency in buildings: district heating	1.9 MWh/employee 101 kWh/m^2
	Energy efficiency in buildings: district cooling	1.0 MWh/employee 53 kWh/m^2
	Renewable energy	4.6 MWh/employee
	Non-renewable energy	0.5 MWh/employee
	Waste	16.5 T (100.0% of Non-hazardous waste) 140 kg/employee
	Water	6.1 m^3/employee
	Material efficiency	1.11 Pages/Day/Employee 1.2 kg/employee
	Biodiversity	Total use of land: 4830 m^2; 41 $m^{2/}$employee Total sealed area: 4830 m^2 ; 41 $m^{2/}$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	Location-Based: 7761 tCO_2e; 8.9 tCO_2e per employee.
		Market-Based: 6459 tCO_2e; 7.5tCO_2e per employee.
	Biodiversity	Total use of land: 42169 m^2 ; 49 $m^{2/}$employee Total sealed area: 19991 m^2 ; 23 $m^{2/}$employee Total nature-oriented area on site: 23575 m^2 ; 27 $m^{2/}$employee Total nature-oriented area off- site: 0 m^2 ;0$m^{2/}$employee

Table 21-Summary of relevant indicators

7. 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 22 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	2018
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	2025
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 22-Details of permits and contracts for each site

8. Annexes

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

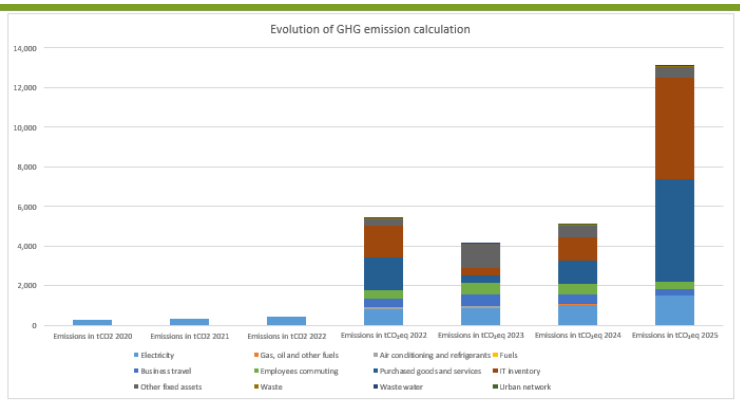
8.2. ANNEX II: METHODOLOGICAL ASSUMPTIONS

The sources of data and hypotheses taken for the environmental performance calculation are the following (table 23):

Data	Site	Kind of evidence	Service	Periodicity	Level of accurency
EMPLOYEE	SXB,TLL,BRU,	Real data for staff member+intern+ intramuros+extramuros+teleowrking rate for staff members	HR	On request	Extact
	SXB	From security service for visitor	Security	On request	Extact
	ILK,Asp, TLL	Based on average number of security guard and cleaning company persons	GESS	Yearly/Monthly	Approximate
	ALL	Intramuros/extramuros	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/FWC manager	On request	Approximate
	Asp	A calculation based on a ratio of Asp site represent 1/2 of worker located in France sites (SXB+Asp)	HR/FWC manager	On request	Approximate
AREA	TLL	From building permit	Facilities	On request	Extact
	SXB	From drawing plan	Facilities	On request	Extact
	ILK, BXL, Aspire	From contract lease	Facilities	On request	Extact
	TLL	Green area : https://xgis.maaamet.ee/xgis2/page/app/maainfo District heating: all building-authorization permit	Estonian Authority	On request	Extact
Electricity consumption	TLL	Sub-metering round	RKAS sub-contractor	Monthly	sub-metering
	SXB	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
	ILK	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
	Asp	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
	BXL	New buildings Electricity consumption from the building is provided by the manager property (CBRE). Then a ratio of 6% is applied related to area that eu-LISA is occupied in comparaison with entire building. Even eu-LISA LO moved from 23th April to the new building, we used these date for the first quarter	CBRE (manager property)	On request	Approximate
Distric heating consumption	TLL	Consumption from district heating provider (Utilitas)	RKAS sub-contractor	Monthly	sub-metering
	Asp	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
PUE value DC1	SXB	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01 *Note: Additional meters needs to calculate an accurate PUE value*	Vinci-FA sub-contractor	Monthly	sub-metering
PUE value MDC1	SXB	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
PUE value MDC2	SXB	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
Water consumption	TLL	FOKA register	RKAS sub-contractor	Monthly	sub-metering
	SXB	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
	Asp	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
	ILK	Sub-metering round_EMS_TEM27_energie and water meters reading for french sites-v01	Vinci-FA sub-contractor	Monthly	sub-metering
	BXL	New buildings Water consumption from the building is provided by the manager property (CBRE). Then a ratio of 6% is applied related to ratio paid by eu-LISA as per of invoices. Even eu-LISA LO moved from 23th April to the new building, we used these date for the first quarter 2025.	CBRE (manager property)	On request	Approximate
Waste generated	BXL	New buildings Quantity of waste by month is provided by the manager property (CBRE). Then a ratio of 6% is applied related to ratio paid by eu-LISA as per of invoices. Even eu-LISA LO moved from 23th April to the new building, we used these date for the first quarter 2025.	CBRE (manager property)	On request	Approximate
	SXB	Waste register is provided by waste management company.	/neutralis/Suez/Wastemarket place	Yearly/Monthly	Accurate
	TLL	Waste register with quantity (in Ton) of waste provided by contractors	City service provider	Monthly	Accurate
	Asp	Waste register is provided by waste management company.	Neutralis/Suez/Waste market place	Yearly/Monthly	Accurate
	ILK	Waste register is provided by waste management company.	neutralis/Suez/waste market place	Yearly/Monthly	Accurate
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 to work emissions have been estimated from a survey but it is difficult to analyze the evolution of emissions because the response rate to the questionnaire was relatively low (21%), making the data not very robust. Purchases and fixed assets: data extraction from the accounting files (in €)	AKIO, provider	On request	Calculation
Climatology	SXB, Asp, ILK	https://www.infoclimat.fr/climatologie/annee/2023/strasbourg-entzheim/valeurs/07190.html	GESS	Monthly	Accurate
	BRU	https://www.infoclimat.fr/climatologie/annee/2025/bruxelles-national/valeurs/06451.html?graphiques	GESS	Everytime	Accurate
	TLL	https://www.infoclimat.fr/climatologie/annee/2023/tallinn/valeurs/26038.html	GESS	Everytime	Accurate

Table 23-Methodological assumptions

8.3. 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	Emissions in tCO_2eq 2025
Electricity	296	355	425	831.2	883.2	1,037.2	1,482.0
Gas, oil and other fuels				7.1	7.1	28.1	9.2
Urban network						13.0	19.0
Air conditioning and refrigerants				86.8	86.8	0.0	2.0
Fuels				17.3	17.3	0.0	0.0
Business travel	45	56	143	143.7	294.0	310.3	178.0
Employees commuting				417.6	582.0	520.4	350.0
Purchased goods and services				2.7	35.9	68.9	6.3
IT inventory				1,632.0	378.2	1,177.4	5,160.0
Other fixed assets				323.8	1,190.1	594.1	526.0
Waste				28.2	31.5	30.1	28.0
Waste water				0.6	0.7	1.5	1.0
Total	**341**	**411**	**568**	**3,491**	**3,507**	**3,781**	**7,761**

Figure 33 - Evolution of GHG emissions calculation

Figure 33 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 GHG protocol, by means of Aktio platform, to calculate the eu-LISA's carbon footprint.

In 2025, the same method than 2023 was used, in using GHG protocol, by means of Aktio platform, to calculate the eu-LISA's carbon footprint. In addition, the emissions associated to licences had been underestimated in the previous carbon footprints (updated since) because some expenses were initially considered as wages.

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 62.20 "activities of computer consulting and management of computer facilities" and 99.00 "Activities of extraterritorial organizations and bodies" (NACE Codes), declares

declares to have verified whether the organisation as indicated in the update environmental statement of the organisation **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) 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)

By signing this declaration, I declare that:

- the verification and validation has been carried out in full compliance with the requirements of Regulation (EC) Nº 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 updated environmental statement of the organization reflect a reliable, credible and correct image of all the organisations, 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) Nº 1221/2009 amended by Regulation (EU) 2017/1505. This document shall not be used as a stand-alone piece of public communication.

Done at Madrid, 28/08/2026

Signature of the Verifier

AENOR CONFÍA, S.A.U.