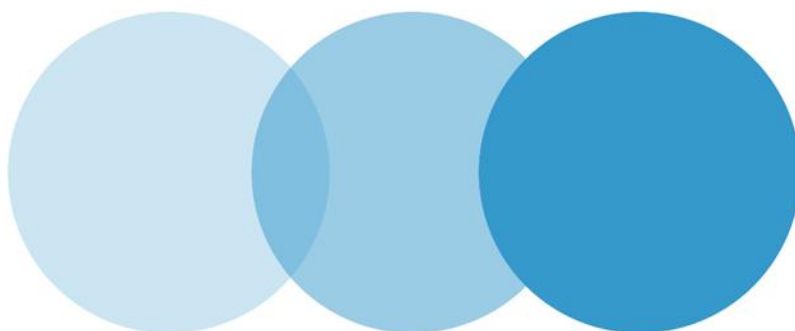




# EURid vzw

## Environmental Statement 2024

### Reporting on 2023



Author(s)	EURid vzw
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*\*The Dutch environmental statement is the only valid statement.  
The English version is only a translation of this.*

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# ENVIRONMENTAL STATEMENT 2024

## Reporting on 2023

### A. INTRODUCTION

#### 1. Preface by CEO

EURid is committed to environmental sustainability and transparency.

This environmental statement outlines our efforts, achievements and ongoing initiatives in line with the EMAS Regulation and is publicly available on our website and in the EMAS register.

To live up to our environmental responsibilities and to ensure that all our activities - including those conducted on our behalf – improve their environmental performance in the short, medium and long term, we focus on:

- implementing a green procurement policy covering both purchase of goods and services (with a special focus on IT equipment, datacenters, network services, venue rentals, catering, travel and commuting).
- influencing the greening of our industry by sharing our best environmental practices through events we organize.
- carefully managing our e-waste, with a special focus on re-use and liaising with the building management to seek reduction of impacts of the services they offer (energy, water, waste collection and treatment).

As the digital world is one of the fastest growing sources of greenhouse gas (GHG) emissions globally, we offset the total amount of GHG emissions by purchasing emission reductions from high-value projects.

The .eu domain is more than just a space for websites and emails, it is a testament to our dedication to a sustainable future.

We wish you a happy reading while discovering our efforts towards a greener .eu!

Peter Janssen

General Manager EURid vzw

## 2. About EURid

The creation of .eu as a European top-level domain dates back to an initiative of the European Council in 1999 to stress the importance that Europe gives to the Information Society and to electronic commerce as instruments to enhance Europe's competitiveness.

In 2002, Regulation (EC) No 733/2002 on the implementation of the .eu Top Level Domain was adopted. And in 2003, shortly after having been incorporated under Belgian law as private not-for-profit association, EURid vzw (the European Registry for Internet Domains) was appointed by the European Commission as the operator of the .eu top-level domain in the common interest, based on the principles of quality, efficiency, dependability and accessibility.

From December 2005, EURid started accepting applications for .eu domain names from prior right holders and from April 2006, .eu registrations were open to the general public (provided they fulfill the eligibility criteria).

Following the initial appointment by the European Commission, EURid was confirmed as the .eu registry manager for consecutive years.

Our headquarters are in Diegem (Belgium) with local presence in Pisa (Italy), Prague (Czech Republic) and Stockholm (Sweden).

### Headquarters:

EURID VZW

Telecomlaan 9 box 7, 1831 Diegem, Belgium

Tel.: +32 2 401 27 50

NACE code of activity (EA CODE): 63.9

We provide support in all official EU languages to around 700 worldwide registrars who offer .eu domain registration services.

We are the first European ccTLD registry to achieve EU Eco-Management and Audit Scheme (EMAS) registration in May 2012.

At the end of 2023, 42 staff members are working at the headquarters in Diegem (Belgium), 9 staff members are working in the local subsidiaries in Pisa (Italy), Prague (Czech Republic) and Stockholm (Sweden).

The surface area of our rented offices in Diegem is 860 m<sup>2</sup>.

At the end of 2023, EURid has a portfolio of 3.782.334 registered (.eu, .eu and .eю) domain names.

### 3. Our services

As the registry operator of the .eu country code top-level domain, EURid plays a crucial role in organising, managing and controlling the .eu top-level domain (and its variants in other scripts) in the common interest, based on the principles of quality, efficiency, dependability and accessibility.

Information security is a fundamental building block of EURid's business. To help the company handle information security in a structured manner in both its technical operations and business processes, EURid achieved its ISO27001 and ISO22301 certification since more than a decade. As foreseen by the standards, EURid is audited on a yearly basis and re-certified every three years.

EURid actively supports key security protocols such as DNSSEC and is also actively involved in combatting and even preventing malicious domain name registrations by actively screening newly registered domain names with our patented [APEWS](#) tool.

We also work closely with law enforcement authorities to fight cybercrime.

## B. STAKEHOLDERS AND PARTNERS

### 1. Organisational structure (Board, Management & staff)

Our management team assisted by the Environmental Coordinator paves EURid's way for sustainable success. The Environmental Coordinator reports to the Board of Directors on EURid's environmental performance.

A team of 51 staff members in our four (4) offices (42 in Diegem, the 9 other colleagues are spread over the 3 regional offices in Prague, Pisa and Stockholm) is committed to combining daily operational tasks with environmentally conscious business. We have set up a working group to help raise awareness among colleagues and help monitor our environmental objectives.

### 2. Stakeholders

Considering our re-certification preparation during the second half of 2023, we analysed our context and identified the key stakeholders that we need to satisfy or closely liaise with to successfully deliver our mission while minimizing our environmental impact. Our key stakeholders are the European Commission, our accredited registrars and our domain name holders; our key suppliers for the datacenters; our building owner and building manager; our staff, management and Board of Directors.

## C. OUR MANAGEMENT SYSTEM

### 1. Scope

The scope of the EURid environmental management system covers all activities related to the planning and provision of services for the management of the .eu, .eu and .eu top-level Internet domain from its headquarters in Diegem, Belgium.

The geographical scope of our environmental management system is limited to our headquarters in Belgium as the regional offices are too small to have a meaningful environmental impact.

### 2. Context analysis

Analyzing the internal and external context, we identified risks and opportunities that the EMS should tackle to reach its objectives:

Risks that the EMS should tackle:

- As a tenant, EURid depends on the building owner for investments to improve the building's environmental impact, risking a *status quo* if there is no direct return on investment for the building owner.
- EURid's car policy and incentives for public transport may not lead to the expected improvements.

Opportunities that the EMS should seize:

- EURid can develop a strategy to make its obsolete IT equipment available for re-use before considering recycling or disposal options.
- On the longer term, EURid can reconsider its teleworking policy to reduce the footprint of its facilities in its overall impact.

### 3. Significant environmental aspects

Early 2023, we up-dated our aspect register to confirm the following aspects as significant.

EURID PROCESSES	ENVIRONMENTAL COMPARTMENT	ENVIRONMENTAL ASPECTS	ENVIRONMENTAL IMPACTS	DIRECT / INDIRECT
<b>Management and use of structure and equipment</b>	Air	Business travel	Increase in pollutant concentration	I
		HFC gasses used in air conditioning for data centres (suppliers)	Increase in HFC gasses	I
		HFC gasses used in air conditioning for server rooms	Increase in HFC gasses	D
<b>Administrative activities management</b>	Stakeholder	Agreements with external stakeholders	Increase in environmental awareness	I
			Increase in activities aimed at improving environmental management	I
		External communication activities	Increase in environmental awareness	I
		Participation in projects with external companies and agencies	Increase in environmental awareness	I
	Air/Energy	Business travel	Increase in pollutant concentration	I
<b>Training and Information activities management</b>	Stakeholder	Involvement of costumers and users	Increase in environmental awareness	I
		Involvement of employees	Increase in environmental awareness	I
		Suppliers awareness	Increase in environmental awareness	I
	Resources	Choice of suppliers for equipment and materials	Increase in environmentally friendly behaviour	D
		Suppliers service for equipment and materials	Environmental impact and resource consumption reduction	I
		Choice of catering service	Increase in environmentally friendly behaviour	D

		Catering service	Environmental impact and reduction in resource consumption	I
		Choice of communication materials	Increase in environmentally friendly behaviour	D
		Use of communication materials	Environmental impact and resource consumption reduction	I
<b>Organization and participation in events activities management</b>	Stakeholders	Stakeholder involvement	Increase in environmental awareness	I
	Resources	Choice of suppliers of equipment and materials	Increase in environmentally friendly behaviour	D
		Suppliers service for equipment and materials	Environmental impact and resource consumption reduction	I
		Choice of catering service	Increase in environmentally friendly behaviour	D
		Catering service	Environmental impact and reduction in resource	I
		Choice of communication materials	Increase in environmentally friendly behaviour	D
		Use of communication materials	Environmental impact and reduction in resource consumption	I



## Assessment methodology

The assessment is to assign a score from 1 to 4 to all environmental aspects/impacts following the following table.

CRITERION	SCORING SYSTEM			
	1	2	3	4
<p><b>EXPRESSION OF INTEREST OF STAKEHOLDERS</b></p> <p>We consider the reports, complaints, requests for environmental that are brought to the attention of employees by, and the European Commission</p>	<p>Stakeholders have active and supportive behaviours.</p> <p>Never been raised protests</p>	<p><i>Stakeholders are partially involved and sometimes make the reports</i></p> <p>There have been complaints</p>	<p>Stakeholders show limited concerns and show a limited interest only because involved.</p> <p>The reports are more frequent</p>	<p>Stakeholders do not show any interest. Are ongoing or have occurred legal process or protests.</p>
<p><b>ASPECT KNOWLEDGE</b> (sufficient availability of information)</p> <p>It assesses whether the data and the information is complete to describe the framework and to monitor the progress of environmental</p>	<p>Data and information available are complete and updated</p>	<p>Data and information available are partially complete and updated</p>	<p>Data and information available are not complete and are not updated</p>	<p>There are no data and information to describe the framework and to monitor the environmental aspect progress</p>
<p><b>ABILITY TO IMPROVE</b></p> <p>It assesses the possibility of introducing new practices or technologies that reduce or contain the environmental impact</p>	<p>New practices and technologies to reduce or contain the impact were introduced</p>	<p>New practices and technologies to reduce or contain the impact were introduced only in part</p>	<p>New practices and technologies to reduce or contain the impact were taken into account only</p>	<p>New practices and technologies to reduce or contain the impact have never been taken into account</p>
<p><b>REGULATORY STANDARD COMPLIANCE</b></p> <p>It assesses the applicability of current regulatory standards, the proximity to legal limits and any occasional exceedances.</p>	<p>Not applicable or well below the legal limits (80% below threshold)</p>	<p>There is the law, but the applicability is not clearly defined.</p> <p>Below the legal limit (50 to 20% below the threshold)</p>	<p>Existence of specific legislative requirements and / or regulations.</p> <p>Close to the legal limits prescribed by law.</p>	<p>Occasional exceeding</p>

Finally, a coefficient of influence (from 0.1 very low influence to 1 total control) multiplies the sum of those scores, and:

- DIRECT environmental aspects/ impacts are classified as significant if it equals or exceeds the score of 8
- INDIRECT environmental aspects/impacts are classified as significant if it equals or exceeds the score of 4

*Note: We revised our approach to significant aspects by year's end, see chapter "F. 2023, the year to prepare for the future"*

## 4. Compliance obligations

Even as simple occupants of office space with little legal requirements that directly fall under our responsibility, in 2023 we had support of experts to help us identify new requirements and assess our compliance.

The expert's legal compliance report did not reveal any breach of environmental legislative requirements, but a few recommendations were formulated which EURid could address with the landlord.

These recommendations relate to the re-use of rainwater and assurance that the oil tanks and power units are inspected and maintained according to the legislative requirements.


Diegem is classified as a Flemish community. Companies located in Diegem need to have an environmental permit when the activities fall under one of the 'risk activities' defined by annex I of the Vlarem II' (classificationlist "Indelingslijst"). Since 23/02/2017 the "environmental" permits are changed into "surrounding" permits, which includes the environmental and building permit <http://www.milieuinfo.be/web/omgevingsloket/digitaal-loket-omv>. However, the existing permits stay valid until expiration.

Table 1: overview of activities class 2. according to the permit of the city of Diegem (Machelen) has been made 5/02/19 (2018/00151-OMV\_2018098198) for P.S.B (the owner of the building and permit owner).

## Summary of classified activities

Category Vlarem II annex 1	Description	Activity EURid	class	VLAREBO (soil)	VLAREM II – VLAREMA – VLAREBO (legal conditions responsibility by permitholder P.S.B)
3.2.2.a	Discharge of domestic waste water, other than from residential units. <u>Volume &gt; 600 m<sup>3</sup>/year (permit: 0,3 m<sup>3</sup>/u)</u>	EURID: Domestic waste water of 42 persons (50 l/day.person) x 220 days/year: Volume 462 m <sup>3</sup> /year < 600 m <sup>3</sup> /year  But total of the building = ± 3.200 m <sup>3</sup> /year)	3	/	<p>Art 4.2.8.2.1: § 1.</p> <p>1°the discharged waste water may not contain textile fibres, or plastic packaging materials, or solid domestic waste materials of an organic or inorganic nature.</p> <p>2°the discharged water may not contain:</p> <p>a) mineral oils, inflammable substances or volatile solvents;</p> <p>b) other substances extractable with petroleum ether, with a value in excess of 0.5 g/l;</p> <p>c) other substances likely to make the sewer water toxic or dangerous.</p> <p><u>REMARK IN PERMIT:</u></p> <p>discharge of rain-water: the drainage of rainwater is preferred to the drainage methods as stated below in decreasing degree of priority:</p> <p>1 ° reception for reuse;</p> <p>2 ° infiltration on own site;</p> <p>3 ° buffering with delayed discharge into surface water or an artificial drainage route for rainwater;</p> <p>4 ° discharge into the rainwater drainage pipe (RWA) in the street.</p> <p>Only if the best available techniques do not permit any of the aforementioned drainage methods, may rainwater be discharged into the public sewer system in accordance with the legal provisions.</p>

3.4.1.a	Discharge of drain water of the cooltowers (permit 1,5 m <sup>3</sup> /u)	Building facilities for PSB	3	/	art 4.2.4.1 § 1 en 2 (quality control of drain water)
12.1.1.2.a	3 emergency power units total 1.575 kVA (permit: 675 kVA, 400 kVA en 500 kVA)	Building facilities for PSB	2	A	Yearly maintenance of the power units. Maintenance is performed by Bobinindus in 2023: dieselengine 400 kVA (ref. BOB 7166): dd. 09/11/2023 dieselengine 500 kVA (ref. BOB 8334): dd. 09/11/2023 dieselengine 670 kVA (ref. BOB 7221): dd. 10/11/2023
12.2.1	3 high tension transformers (3 x 800 kVA) (no longer applicable due to change of the rubrique list Vlare II dd. 26/11/2022)	Building facilities for PSB	3	/	Yearly control of transformers (AREI art. 272) + Vlare II. Control is performed by Vinçotte in 2023: dd. 30/08/2023 see Vlare II heading 6.13.2
12.3.2	2 UPS/No break systems (40 kW) (no longer applicable due to change of the rubrique list Vlare II dd 26/11/2022)	EURid – computersystem UPS in server room	3	/	Vlare II Art. 6.13.3 -> 6.13.6
16.3.1.2  Is now: 16.3.2°b) – more than 200 kW	Airco units and coolers: total installed power 492,79 kW  Permit: water-cooled: 232 kW Air-cooled: 238 kW Condenser: 3,3 kW Condenser: 1,06 kW Split airco's: 13,75 kW (freezer)	In kitchen: one freezer In server room: one “stand alone” airco-system	2	/	Chapter 5.16.3.3 (version dd 23/02/2017): 2-yearly maintenance and control of leakdetection Daikin “AZAS 100 M 7 V1B” R32 2,6 kg attest control leaktest and maintenance TEM dd 14/03/2022 (no remarks “goed”) attest control leaktest and maintenance TEM dd 23/11/2022  On top of the Vlare II regulation there is also the regulation concerning energetic inspection 5.16.3.3 §3 4°. Since 1/04/2007 comfort cooling units with a nominal cooling capacity of more than 12 kW have to be regularly inspected by an expert. This is NOT applicable for EURid because the comfort cooling airco unit in the server room has an individual nominal cooling capacity of 10 kW. The coolingsystem in the whole building is also water- and airbased. Link legislation: <a href="https://emissie.vito.be/">EMIS Navigator (vito.be)</a>

17.3.2.1.1.1 b	4 above ground orange tanks for diesel oil: 500, 1000 and 500 l integrated on the emergency power engines; 8.000 l diesel oil	Building facilities for PSB	3	/	Art. 5.17.4.3.16: 3-yearly limited control of the 8.000 liter tank diesel oil; 20-yearly full general control done by agreed certified company. OK - Done by Corcon bvba 1.000 l dd. 21/04/2021 (before 21/04/2024); 8.000 l dd. 13/09/2022 (before 13/09/2025) Link legislation: <a href="#">EMIS Navigator (vito.be)</a>
17.4	Storage of chemicals, in containers with a capacity of up to 30 liters or 30 kilograms, provided that the maximum storage is between 50 kg/l and 5,000 kg/liters: 250 l	Storage of chemicals (detergent & cleaning products) EURid: 2 x 1 l detergent / 1 kg for the dish washer; cleaning products Total for the building: 250 l	3	/	Storage of products in small bottles with symbol  are placed in a bin in the cleaningroom.
31.1.1.a	3 emergency diesel engines (330 kW, 538 kW and 487 kW)	Building facilities for PSB	2	A	Art 5.43.2.23; 2° < 500 hours/year: 5-yearly emission control of waste gases: not applicable 50 % of power -> less than 300 kW so there is no emission control applicable Link legislation: <a href="#">EMIS Navigator (vito.be)</a>
43.1.1.a	3 gasburners (764 kW, 653 kW and 44 kW)	Building facilities for PSB	3	/	Emission control: art 5.43.2.23.2° < 500 hours/year (> 0,3 MW th < 1 MWth): Link legislation: <a href="#">EMIS Navigator (vito.be)</a> Heating-audit: first time if installation is 5 years old and than every 4 years Link wetgeving: <a href="#">EMIS Navigator (vito.be)</a>

**Waste:**

According to “VLAREMA” regulations (Section 4.3 article 4.3.2) the following waste should be collected separately:- list updated since 01/12/2019.  
link [EMIS Navigator \(vito.be\)](#)

## 5. Complaints or requests

There were no complaints, nor requests from any stakeholder regarding our environmental performance in 2023.

## D. OBJECTIVES

Objective	Indicators	Achievement and progress	Comments
Reduce the environmental impact of transport.	% of hybrid or electric cars	96%	See performance analysis and <a href="#">decisions for the future</a> .
	# video conferences	Not measurable as Teams has become an everyday tool.	We have decided to measure the actual GHG emissions of travel by EURid staff and visitors to our events.
Assess EURid's carbon footprint and compensate real CO2 emissions.	CO <sub>2</sub> eq. emissions from EURid's domains per year	83 g CO <sub>2</sub> eq./domain name	The scope is a little different, see performance section.
	CO <sub>2</sub> eq. emissions compensated per year/total quantity of CO <sub>2</sub> eq. emissions from EURid activities per year.	Target remains 100%	We have selected PlantC ( <a href="https://PlantC.be">https://PlantC.be</a> ) to fully compensate for our GHG emissions as stated in our Environmental Policy. The project from PlantC is a local project in Belgium that relates to reforestation and to agriculture addressing biodiversity (animal welfare and plantation of an apple and pear orchard). On top of capturing CO <sub>2</sub> , this creates a real ecosystem for pollinators, birds, etc.
Continue to implement a strategy to inform the registrar community and the stakeholders about our environmental commitment.	No. of environmental communications (all types) created per year	News items on eurid.eu: 6 News items on registry.eu: 5 Social media posts: 10 Total:21	Eurid.eu and social media posts are public. Registry.eu element are dedicated to only accessible registrars. Including publication of 2023 statement reporting on 2022
	No. of environment-related complaints per year	0	None received.
	No. of nominated .eu environmental websites per year within the Better World category of the Web Awards Initiative	60	The Better World category refers to websites that support European green values initiatives and provide information on environmental protection, promote environmentally friendly activities and showcase green projects. This encompasses a broad range of topics, including eHealth, Smart Cities, Intelligent Transport solutions, and Smart Agriculture, among others. The Better World category received 45 nominations in 2022, compared to 30 in 2021, indicating an increase in nominations in 2023.
	No. of training hours dedicated to the environment per year	Management: 4 hours All staff: 1 h (staff retreat)	Training of management on EMAS in June 2023 in the "new EMAS" implementation process Presentation on EMAS in the 2023 staff retreat

# E. ENVIRONMENTAL PERFORMANCE

## Foreword: What we can manage and what we can only influence...

EURid is a tenant for its headquarters in Diegem, where EURid only occupies 7,23 % of the total surface.

The building is heated by gas, under the building manager’s responsibility, so EURid can only influence the gas consumption and its environmental impact through adjusting temperature settings.

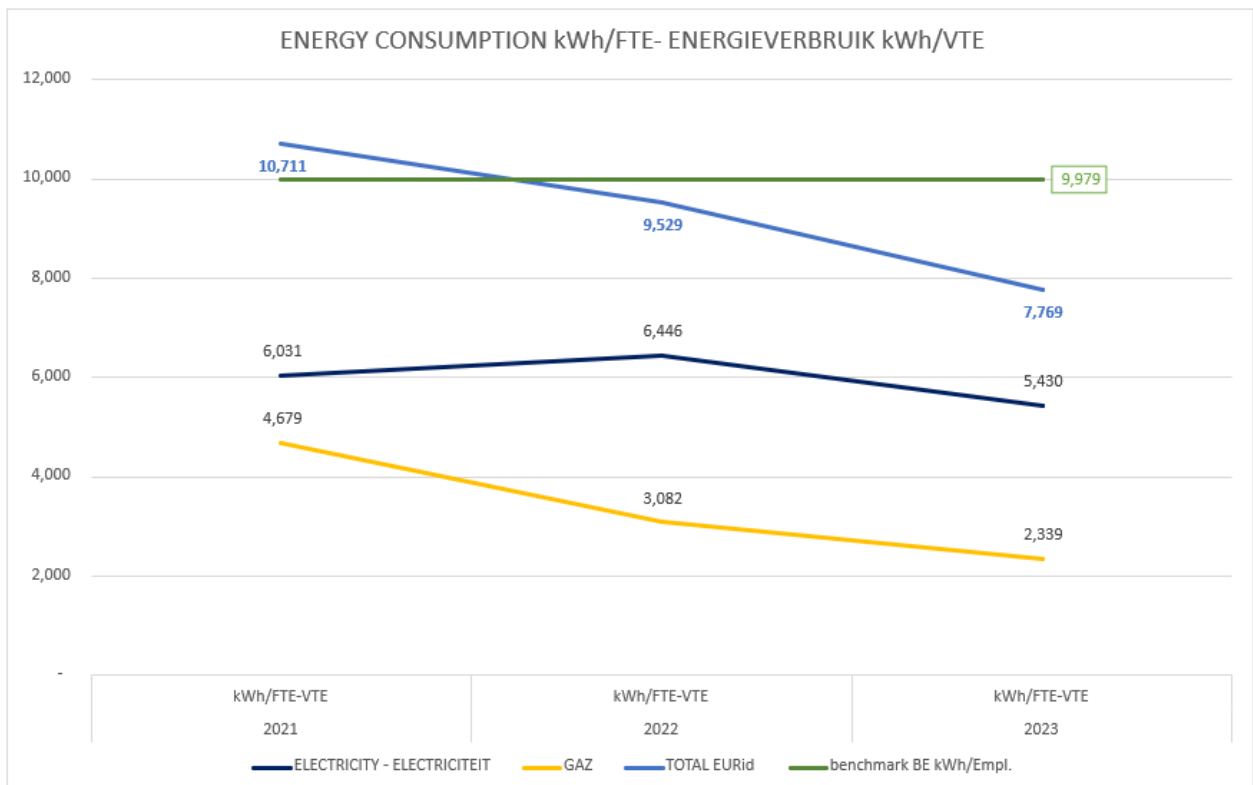
The building’s energy supply is also managed by the building manager to operate lighting, elevators, cooling of the premises as well as all electrical appliances in the shared areas. Next to that, the building’s water supply is also managed by the building manager.

The building manager also maintains the premises and arranges for waste collection in line with local waste regulation for office waste.

For all these environmental impacts of the building that we have no control over, we report our consumption based on our share of the rented surface in the building, as there is no individual metering.

## 1. Energy consumption

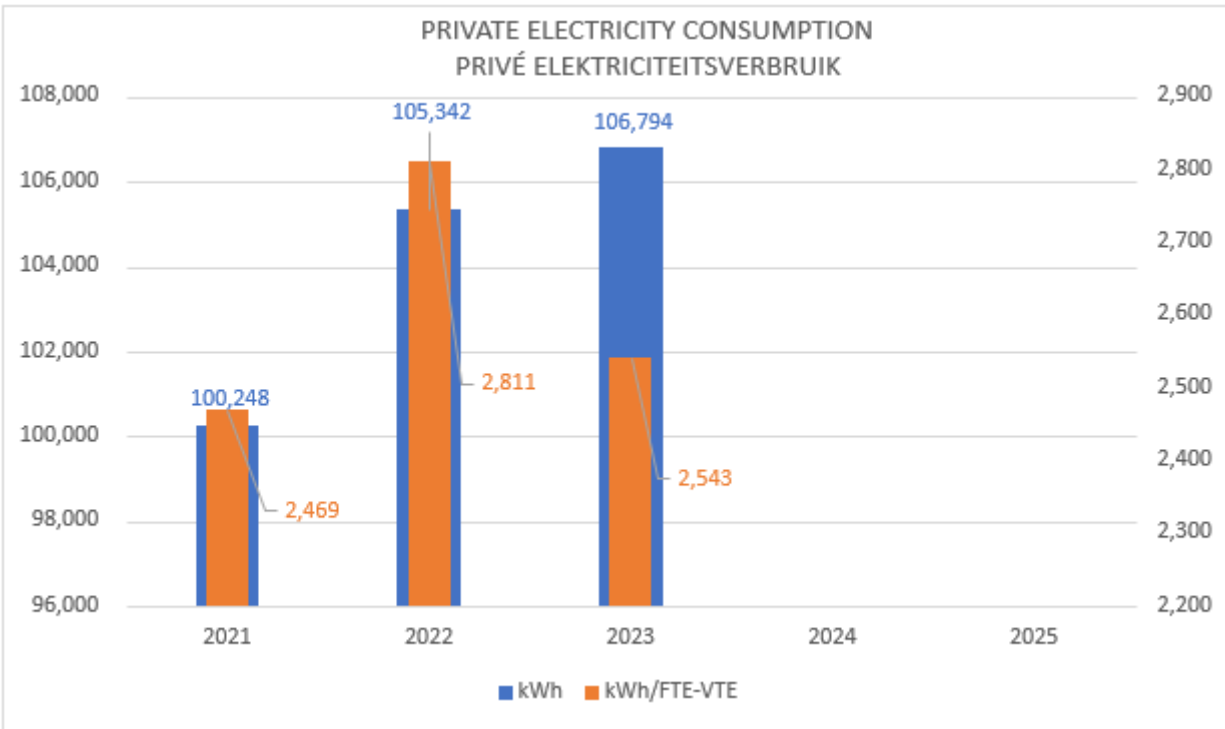
We measure our energy consumption in kWh per FTE. We do not report on our energy consumption before 2021 as the pandemic makes the data irrelevant.



The building manager has made big efforts in managing gas consumption, specifically in adjusting heating periods according to actual building usage. This allows for big gains and allows us to go under the Brussels benchmark of energy consumption.

For electricity, we have individual metering for our offices, what we refer to as private energy consumption. When we focus on that direct impact, we see that the gross consumption is growing. This is intuitively explained by the fact that there is more and more presence in the office building after the pandemic.

We do not have access to pre-pandemic data for comparison, nor do we have data on levels of telework prior to 2023. In 2023, the telework represented 40% of working time when the maximum authorized is 60%.



To stop that trend on increasing electricity consumption, we need to regularly communicate and audit our best practices for electricity saving.

To be noted: The building has a contract for 100% green electricity.

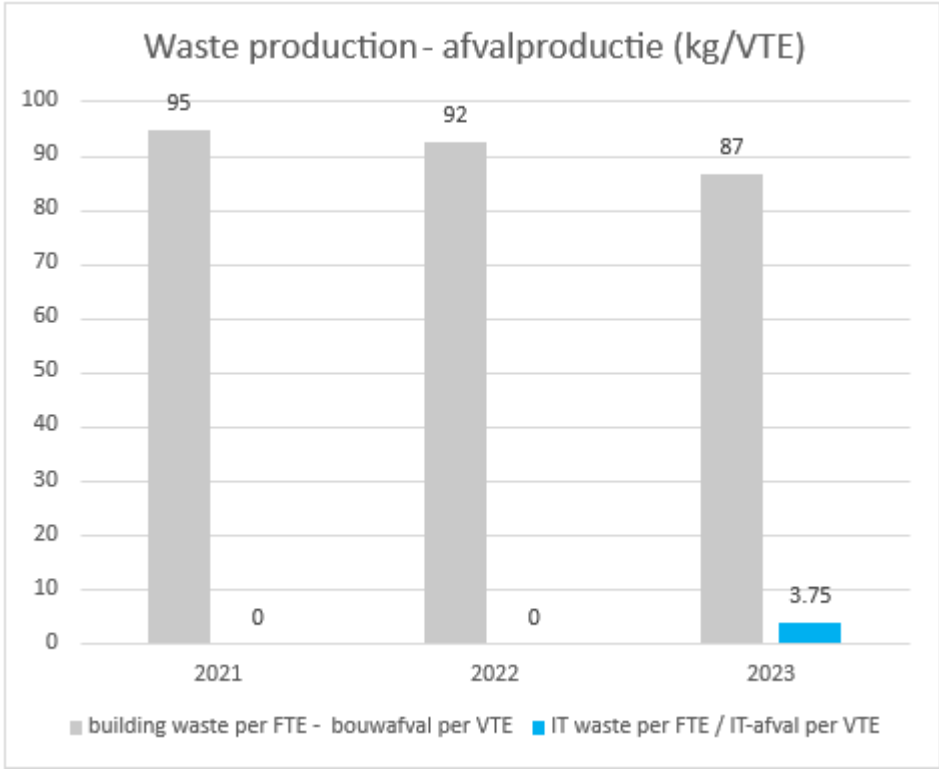
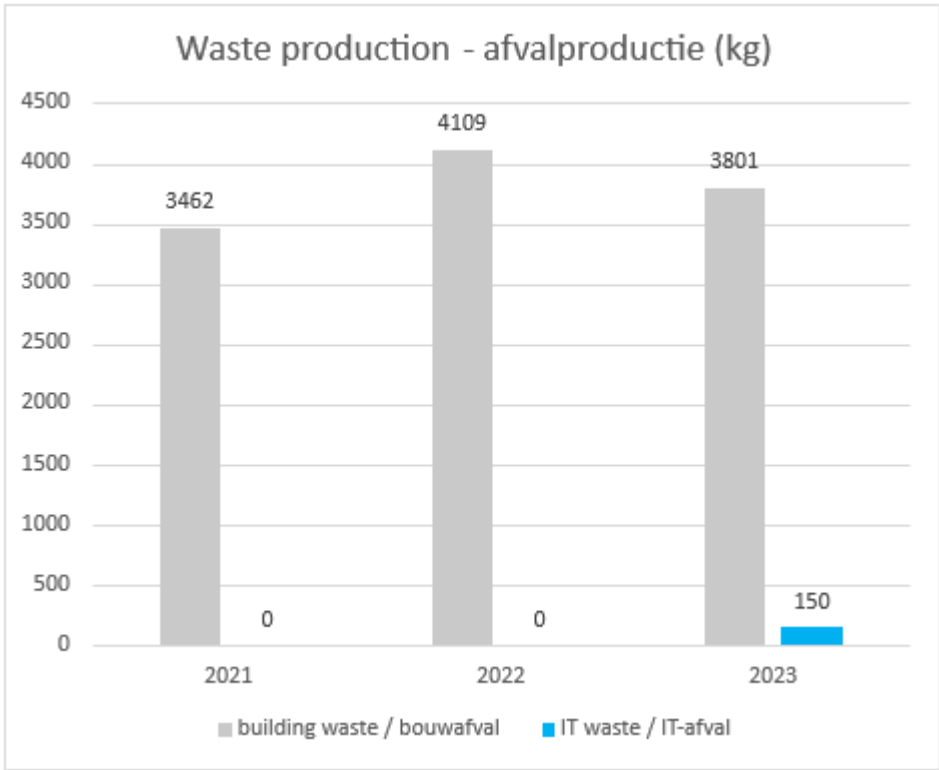
## 2. Waste

Our **office waste** is sorted according to the local waste regulation and is collected by the cleaning personnel. It is evacuated by an ISO14001-certified supplier contracted by the building manager.

Up until 2023, we stored IT waste. In 2023, we initiated the disposal of this **historical IT waste**, that was partially recycled.

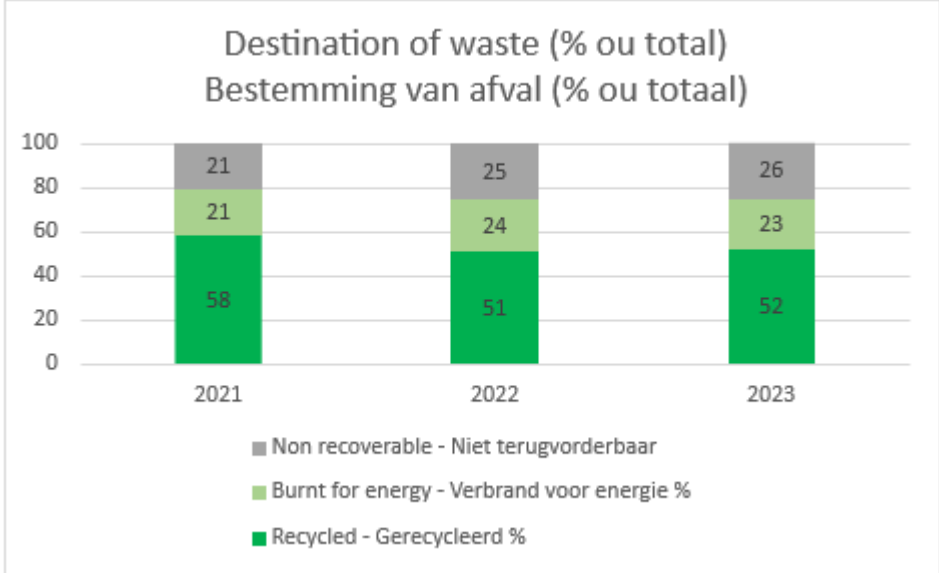


The offices are cleaned by a cleaning firm that only brings and uses a very limited number of cleaning products. After use, the empty packaging of this very limited amount of hazardous products is taken away by the cleaning firm.



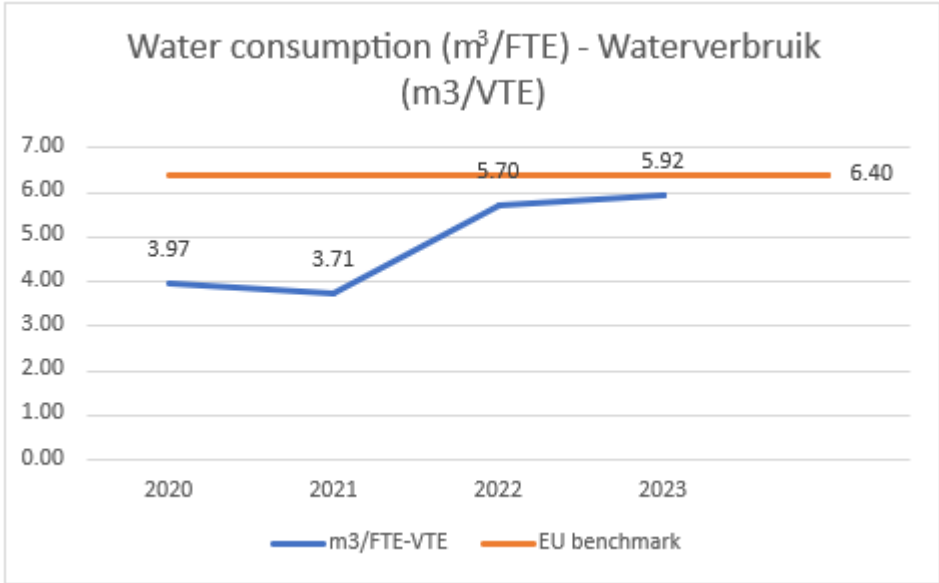
Given this office waste relates to the waste of all tenants in the building, we have no clear view of what originates from EURid. For office work, the European benchmark is at 200kg/FTE/year. We can see that we are well below/

On the share of recycled waste, we see there is tendency to diminish.



### 3. Water consumption

Also, as stated above, the water consumption in the office building relates to the consumption of all tenants in the building, so EURid’s water consumption is calculated as a share of the entire building’s consumption as indicated on the general building meter. EURid’s water consumption per FTE has slightly increased since the pandemic, which is consistent with more staff being present in the office.

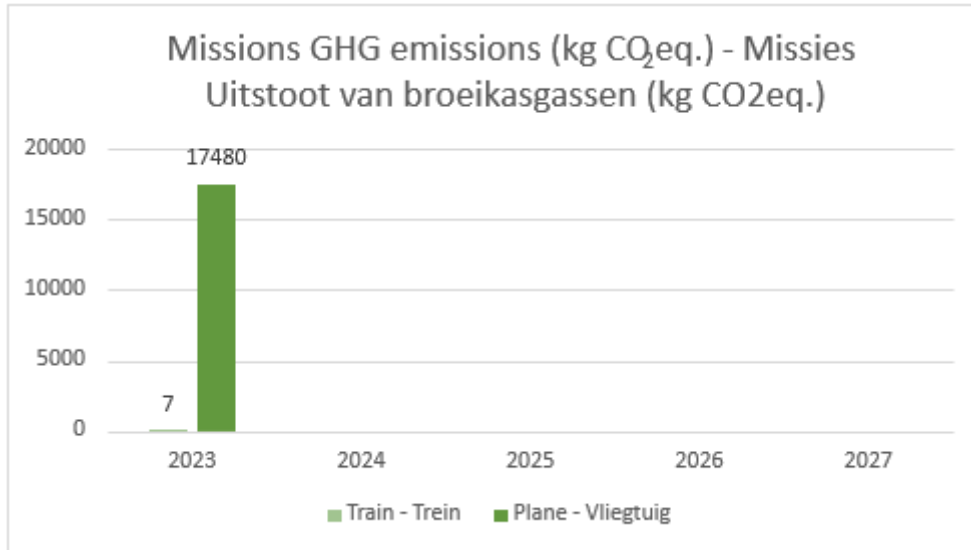


## 4. Travel

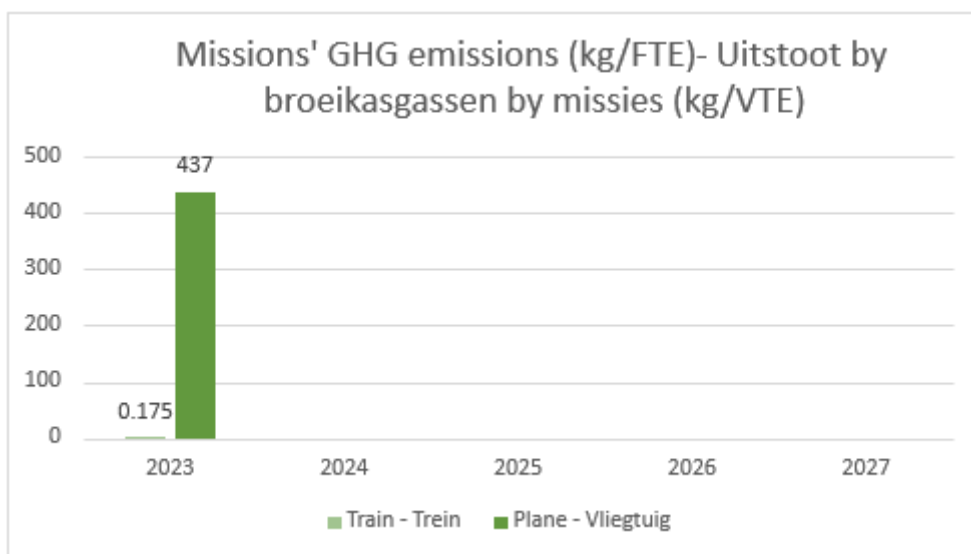
### a. Missions by EURid staff

This is a new category of our environmental impact that we started monitoring as of 2023. EURid staff may travel for meetings with stakeholders, fairs, etc.

We evaluate the GHG emissions associated with all travel by plane and train.



To evaluate potential improvement, we looked at all plane trips and checked how many of them were within a distance of less than 500 km. We identified 10 trips, that concerned 2 events of several travelers. Shifting those to travel by train would have reduced our emissions by 10%; though in both cases significantly lengthening the duration of the trips. As a way of improving our impact by CO<sub>2</sub> emissions, we will review our travel policy by promoting travel by train over plane systematically and adjusting the number of travelers to the minimum necessary.



## b. Commuting by staff

For day-to-day commutes, a part of the staff is entitled to a company car. The fleet has been largely electrified through hybrids (1 petrol, 27 plug-ins in 2023).

	<b>2021</b>	<b>2022</b>	<b>2023</b>
Average fuel consumption (L/100km)	6,74	6,34	6,79
Electricity consumption	No data available	No data available	1 625,24kWh (partial data)

The electricity consumption was measured first in 2023, so there's no data available for the previous years because it was not measured then.

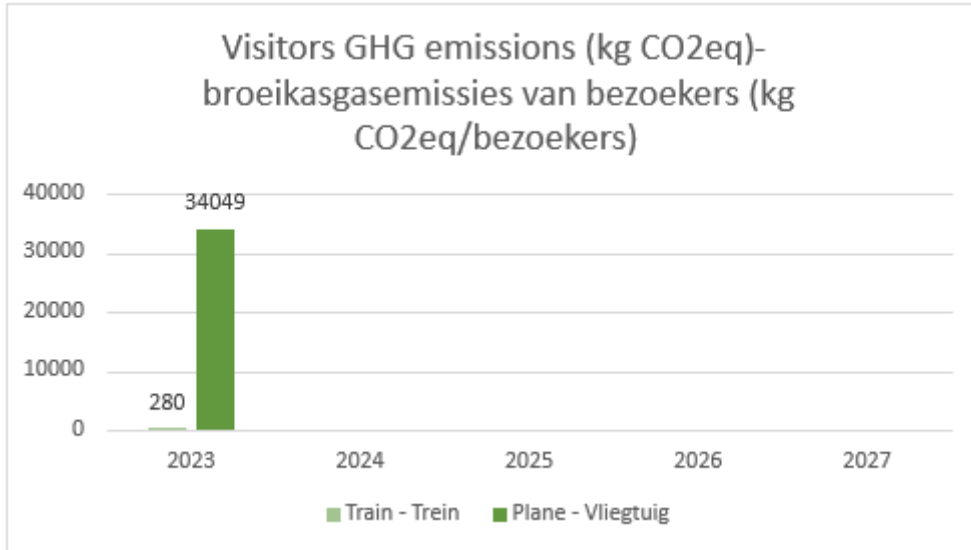
Given the electricity reported, it seems that very few people are charging their car and using the electricity mode. To improve this, a new car policy is adopted at the end of 2023 to gradually go full-electric in the future and charging infrastructure will be installed in the parking of the office building in 2024 to charge the leased cars during the working day. We do not have detailed information the commuting of other staff members, this will be evaluated in 2024 through a survey.

## c. Organizing events

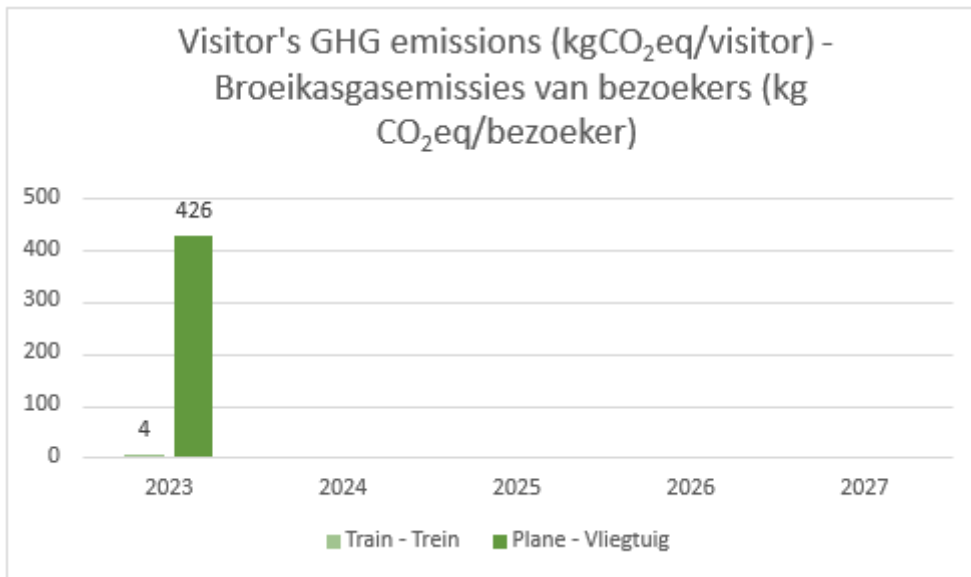
So far, we do not have the possibility to measure the environmental impact of our events, as there is no reporting organized with suppliers.

Even if there are best practices implemented when organizing events, the biggest reduction of our environmental impact for the future lies in the decision to organize the .eu Web Awards only every other year going forward.

The only relevant impact we can measure related to events or trainings where EURid arranges for the travel and accommodation of its visitors. We have monitored this for the first time in 2023 and the resulting level of the GHG emissions of these travels is:



This represents approximatively double the emissions of EURid's staff for missions.



There, all trips by plane are above 500km one way. As these trips are needed for our missions to be achieved, we do not foresee any improvement in that field and our in-presence meetings are already low.

Data is collected every time we book travel (for staff and visitor business trips) and we calculate greenhouse gas emissions based on Bilan Carbone® emission factors.

## 5. Other

### a. Biodiversity and land-use.

We rent our offices. We do not lease or own any other land, there is therefore no relevant information to be reported.

### b. Material use.

We used to report on our paper consumption, given the progress made in the past years (-92% between 2017 and 2022) and the nature of our activity – highly digital, we consider this measurement as not useful anymore.

We did not use to evaluate the quantity purchases of our IT equipment – lap tops, phones, servers... etc. They are key to us conducting our business, and in our opinion provide a better representation of our material use. Digging into all associated impacts of those purchases would be too burdensome for our teams, therefore as a proxy of the associated environmental impacts we decided to evaluate the carbon footprint associated to their production, it is reported below in the GHG emissions data as “IT assets”, from 2023.

### c. Air emissions

The on-site air emissions due to burning gaz for heating are not under our management control. We as well contribute to air pollution through our cars. We nevertheless do not report directly on air pollutants such as SO<sub>2</sub>, NO<sub>x</sub> and PM...We follow them indirectly through our GHG emissions. Getting the same information on other pollutants (SO<sub>2</sub>, NO<sub>x</sub>, PM...) would be a poor use of our resources given that we target to shift our fleet to electric and continue to influence the building management to reduce gas consumption.

## 6. GHG Emissions

### a. Scope of the carbon footprint

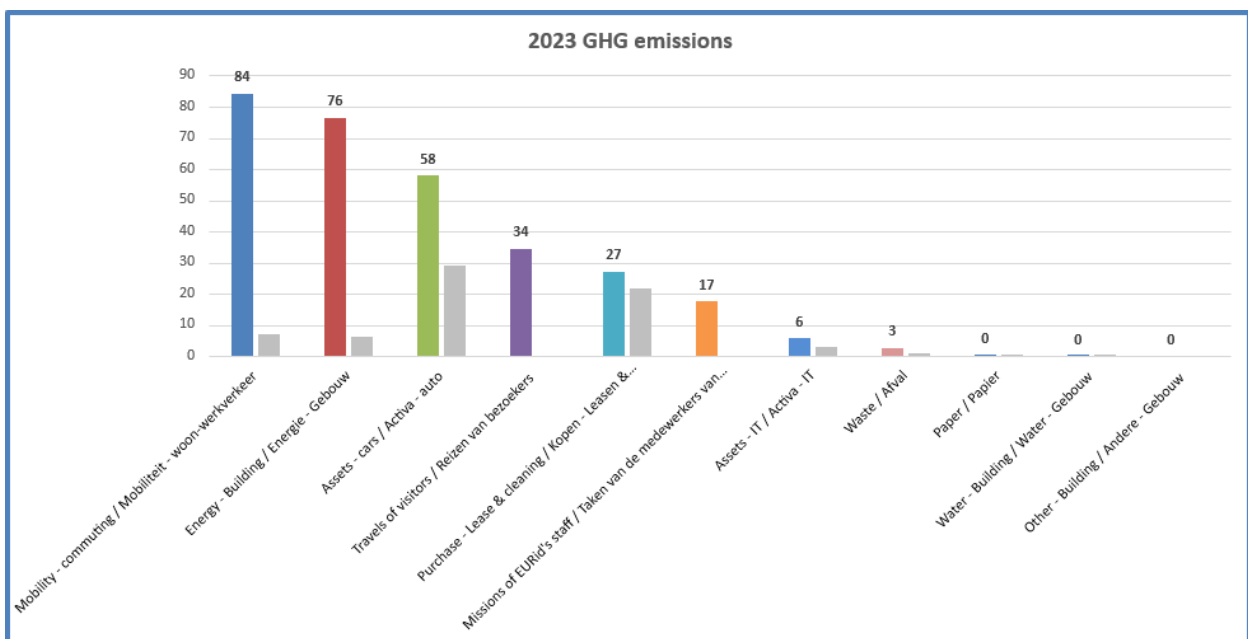
We calculated our carbon footprint using the Bilan Carbone® methodology.

We consider the following as the most significant relevant emissions sources to calculate our carbon footprint (CFP):

- Energy: for building uses
- Direct GHG emissions (refrigerants)
- Mobility: car fleet (both cars and their energy consumption); business travel by plane and train; travel of visitors by plane and train
- Purchases: lease and cleaning services
- IT assets for office work
- Water
- Paper

We leave out of scope the many services we purchase, we will work in 2024 to address these in the best possible way, to have clarity on the emissions associated to one .eu domain name.

### b. Emissions



We see clearly that mobility is a key element in our GHG emissions and that the project of going to 100% full-electric cars should as well be our priority for 2024.

### c. Comparison with previous years

As of 2023 carbon footprint, we used the Bilan Carbone(r) methodology and extended the scope to have a better view on our emissions, which explains the significant increase in GHG emissions. With the remodeling of our management system, we will probably extend it even more in the future to be more accurate in the GHG emissions of a .eu domain name.

Progress of our GHG emissions:

	2021	2022	2023
Total GHG emissions - tons	141.6	145	305.8
GHG emissions – grams per domain name	38	39	83

The following table shows scope differences.

	2021	2022	2023
Energy-building	y	y	y
Paper	y	y	y (prints)
Water-building	n	n	Y
Mobility commuting	n	n	Y (cars)
Refrigerant gas - Building	y	y	y
Waste	n	n	y
Missions of EURid's staff	Partial (flights out of EU only)	Partial (flights out of EU only)	y (plane, train, car included in commuting)
Travels of visitors	n	n	y
Purchase – Lease & cleaning	n	n	y
Assets - IT	y	y	y
Assets - Cars	n	n	y



## F. 2023, the year to prepare for the future

With current society's growing concern on environmental sustainability, the EU's Green Deal and a change of environmental coordinator, it seemed important, in 2023, to work on improving our management system and specifically to prepare the renewal of our EMAS registration in 2024 by integrating better our core business activities.

### 1. New scope

We felt that our environmental management system did not sufficiently cover our core activities and did not reflect our job as a tech company.

The scope of the EURid environmental management system covers all activities related to the planning and provision of services for the management of the .eu, .eu and .eu top-level internet domain managed from its headquarters in Diegem, Belgium.

The geographical scope is limited to our headquarters in Belgium as the regional offices are too small to have a meaningful environmental impact.

### 2. New significant environmental aspects - Initial assessment

In Q4 2023, after the review of the context analysis the environmental assessment was reviewed, with a special focus on indirect aspects, many of which related to the operational business processes. Interviews with process owners were conducted in order to identify the direct and indirect environmental aspects.

To identify significant environmental aspects the following criteria were used:

- The existence of permit related or contractual requirements
- Direct aspects: Sensitivity of the receiving environment. Or, indirect aspects: possibility to influence impacts up-stream
- Level of consumption/emission or tendency or to worsen
- Failure to meet "manage closely" stakeholder expectation.

To prioritize actions, 3 criteria were used:

- Corporate policy or vision supporting or requiring improvement
- Level of control and existing operational control
- Positive return on investment of improvement actions.

As a result, for 2024 and until further reviewed, EURid will focus on:

#### **The following significant aspects:**

- Budget of future projects, and recurring
- Direct procurement (goods) - IT equipment
- Direct procurement (services) - Lease Datacenters
- Direct procurement (services) - Network access

- Direct procurement (services) - other IT services
- Participation in industry and non-industry events
- Lease of 860m<sup>2</sup> of office space (contract until 2028)

Taking actions as well on:

- Organizing events - Travel of visitors/teachers
- Organizing events - Location & Catering for events
- Heating and cooling of the premises, IT equipment use (= direct energy consumption).
- WEEE generation and disposal.
- App LC management, inclusive of design of redundancy

### 3. New environmental Policy

After that work, it became obvious we needed to review our environmental policy, which was approved on December 7<sup>th</sup> 2023 and is attached hereto as Annex 1.

### 4. New objectives

As an organization, we plan our activity annually, therefore we set our environmental objectives annually as well.

The 2024 statement will report on progress towards the following objectives:

Topic	Objective
ENERGY	Maintain private electricity consumption below 2500kWh/FTE (baseline 2023: 2543kWj/FTE).
ENERGY	Meter separately the electricity consumption for car (once chargers are installed).
WASTE	Eliminate 50% “historical waste” by end 2024.
MOBILITY	Measure impacts of staff commuting for those who do not have a car.
ENERGY in DC	Measure energy consumption of our equipment/DN, to target actions.
PROCUREMENT	Revise the procurement policy and define criteria for each procurement categories.
PROCUREMENT	Define a time efficient and easily replicable process to assess how green the procedures are and how green the contracts are and set an improvement target for Y+1.
TRAVELS	Revise the travel policy, including a hierarchy in travel modes.
EVENTS	Determine the type of label that venues, caterers, etc. should have (in procurement policy revision) and conditions for travel for visitors.
BUDGETING PROCESS	As a first step, when preparing 2025 budget, provide a brief evaluation of the impact of projects on energy consumption.

# ANNEX 1 – Our environmental policy

## Environmental Policy

### About EURid

EURid vzw, a Belgian not-for profit association, is the European Registry of Internet domain names that manages the .eu top level domain and its variants in other scripts under a service concession contract with the European Commission.

In line with the ambitions of the European Green Deal, EURid commits to pioneering sustainable digital practices, reducing our carbon footprint and promoting eco-friendly online infrastructure.

We believe that as a key player in the European digital ecosystem, we have a vital role to play in accelerating Europe's transition to a climate-neutral Europe by 2050, a future European economy with net-zero greenhouse gas (GHG) emissions.

EURid has been EMAS certified since 2011 and has implemented an Environmental Management System (EMS) compliant with the EMAS Regulation.

### About this Policy

Welcome to the green side of the web! The digital world has a footprint, too.

Picture this policy as our way of showing Mother Earth some serious love and committing to making a positive mark in the Internet industry. Through continuous improvement under the Eco-Management and Audit Scheme (EMAS), we pledge to enhance our environmental performance, prevent pollution, foster innovation and empower our stakeholders to actively contribute to a green digital transformation.

This is not just a policy, it is a promise to be mindful of the environment in everything we do.

### Purpose and Scope

This policy provides a comprehensive framework for environmentally responsible practices.

By establishing clear objectives and guidelines, we aim to integrate sustainability into all facets of our operations.

We adhere to all relevant environmental laws, regulations and standards, ensuring that our operations meet or exceed the prescribed environmental requirements.

We also recognize the importance of fostering a culture of environmental awareness among our employees, stakeholders and the wider Internet community.

Our success depends on the ability of each of us at EURid to enhance our environmental responsibility. We actively communicate to and train staff as needed and we regularly

challenge our suppliers to ensure that, when working for us, they offer the best environmental standards possible.

To live up to our environmental responsibilities and to ensure that all our activities - including those conducted on our behalf – improve their environmental performance in the short, medium and long term, we focus on the following topics:

- Implementing a thorough green procurement policy covering both purchase of goods (with a special focus on IT equipment) and services (with a special focus on datacenters, network access services, venue rentals, catering, travels and leased cars).
- Fully assume our role of influencing the greening of the industry by sharing our best environmental practices with peers and other stakeholders, through events we organize.
- Headquarters operations:
  - Regularly liaising with the building management so that they seek reduction of impacts of the services they offer – energies, water, waste collection and treatment.
  - Implementing and communicating best practices at our level;
  - Carefully managing our e-waste, with a special focus on re-use;
- Finally, as the digital world is one of the fastest growing sources of greenhouse gas (GHG) emissions globally, we calculate those remaining after our mitigation efforts and, offset the total amount by purchasing emission reductions from high-value projects.

Our public **Environmental Statement** that is published on our website faithfully reflects our efforts and progress.

The .eu domain is more than just a space for websites and emails, it is a testament to our dedication to a sustainable future.

We invite you to join us on this journey and to celebrate the milestones we achieve together.

Let us make the web a greener place together! Catch you on the green side...

Peter Janssen – General Manager



7 december 2023

## ANNEX 2 – Validation from the verifier

### ENVIRONMENTAL VERIFIER'S STATEMENT ON VERIFICATION AND VALIDATION ACTIVITIES

Vinçotte S.A. (with EMAS environmental verifier registration number BE-V-0016 accredited for the scope 1, 10, 11, 13, 16, 18, 19, 20 (excl. 20.51), 21, 22, 23, 24, 25, 26, 27, 28, 29, 30.2, 30.9, 31, 32, 33, 35, 36, 37, 38, 39, 41, 42, 43, 45, 46, 47, 49, 50, 52, 53, 55, 56, 58, 59, 60, 62, 63, 70, 71, 72, 73, 74, 79, 80, 81, 82, 84, 85, 86, 87, 88, 90, 93, 94, 95, 96, 99 (NACE-code) declares to have verified whether the whole organisation as indicated in the updated environmental statement 2024 of the organisation EURid vzw with registration number BE-VL-000016 meets all requirements of Regulation (UE) 1221/2009 modified by Regulation EU 2017/1505 and 2018/2026 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).

Sites involved: Diegem

By signing this statement, I declare that:

- the verification and validation have been carried out in full compliance with the requirements of Regulation (UE) 1221/2009 modified by Regulation EU 2017/1505 and 2018/2026;
- 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 2024 of the site reflect a reliable, credible and correct image of all the sites activities, 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 (UE) 1221/2009 modified by Regulation EU 2017/1505 and 2018/2026. This document shall not be used as a stand-alone piece of public communication.

Done at Brussels on 26/08/2024

Signature

Eric Louys

Chairman of the Certification Committee