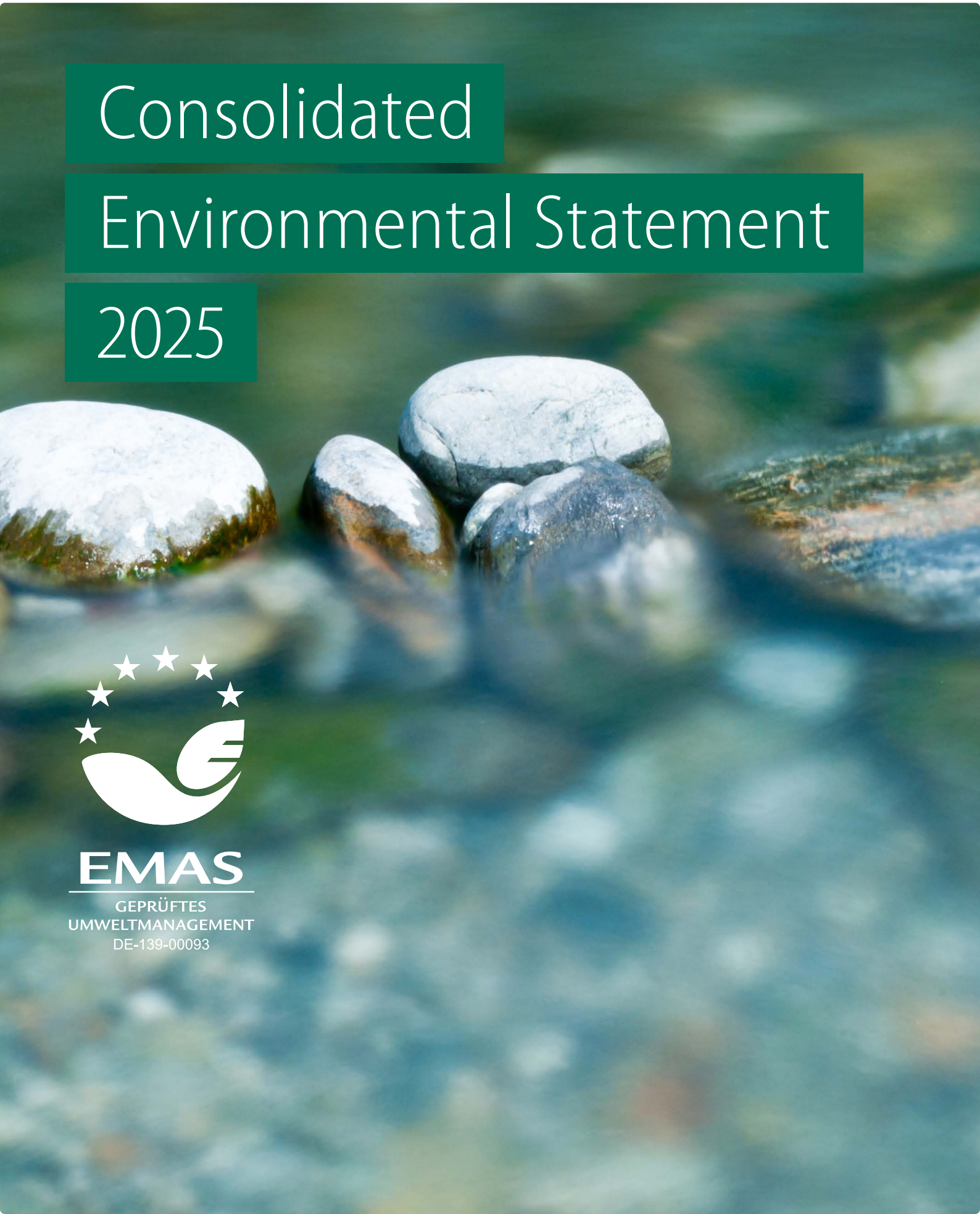
Dr. Schumacher

Wir schützen Deine Gesundheit.

Consolidated Environmental Statement 2025



EMAS
GEPRÜFTES UMWELTMANAGEMENT
DE-139-00093

Contents

Contact

We would be grateful for any comments or suggestions you may have regarding our environmental statement and would kindly ask you to contact our Sustainability & Environment Manager directly in this regard.

Dr. Schumacher GmbH

Dr Manfred Möller
Am Roggenfeld 3
34323 Malsfeld-Beiseförth
P +49 5664 94966801
manfred.moeller@schumacher-online.com

Legal notice

Issuer

Dr. Schumacher GmbH
Am Roggenfeld 3
34323 Malsfeld
Germany
P +49 5664 9496-0
F +49 5664 8444
info@schumacher-online.com

www.schumacher-online.com

You can find the current environmental statement in the download section of our website.

Abbreviations

A.I.S.E.

Association Internationale de la Savonnerie, de la Détergence et des Produits d'Entretien (International Association for Soaps, Detergents & Maintenance Products)

EMAS

Eco Management and Audit Scheme

IMS

Integrated Management System

MB

Management Officer

PDCA

Plan Do Check Act

VOC

Volatile Organic Compounds


EMAS
GEPRÜFTES
UMWELTMANAGEMENT
DE-139-00093

Managing Directors of Dr. Schumacher GmbH: Dierk Schumacher, Dirk Hamenstädt

Foreword from the Managing Directors

Dr. Schumacher GmbH offers products and services of the highest quality to its customers. The quality management system, which has been certified according to ISO 9001, DIN EN ISO 13485 for many years and meets the requirements of pharmaceutical GMP, is an indispensable prerequisite for the company's success.

In addition, compliance with occupational safety and environmental protection requirements is an important part of our business activities.

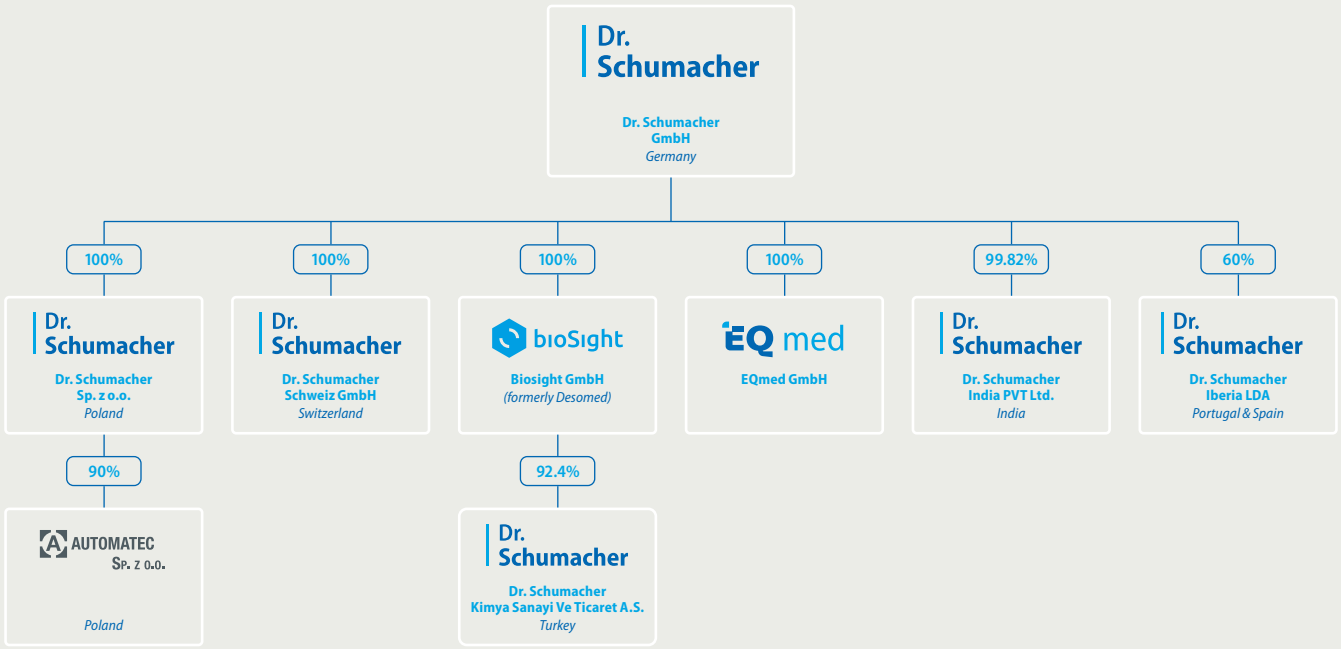
For more than 14 years, Dr. Schumacher GmbH has had a management system in place that integrates occupational safety and environmental protection concerns in order to optimally meet the ever-increasing safety awareness, operational environmental protection and the legitimate interests of an increasingly conscientious public. This management system has been validated according to EMAS III and also meets the requirements of the DIN EN ISO 14001:2015 and DIN EN ISO 45001:2023 standards. An overview of the company's environmental performance and environmental aspects has been summarised in the current environmental statement. In addition, we have met the requirements of A.I.S.E for our cleaning agents. We also have a monitoring audit in 2024. The certifications according to FSC/PEFC (sustainable forestry) and RSPO (sustainably managed palm oil) were also successfully continued. We reject child labour, all forms of forced labour and discrimination, as well as disciplinary measures that lead to physical or psychological impairment. The health and safety of our employees is of the utmost importance to us, and we are committed to providing suitable working conditions at all times. We also expect our suppliers to comply with these principles. The certifications according to cosmetics GMP (EN ISO 22716) and the International Featured Standard Household Personal Care (IFS HPC) were discontinued in 2024 because cosmetics are now only manufactured at the Luban site. These certifications continue to be valid there.

With this fifteenth update of our environmental statement, we want to inform the interested public, in particular our customers and neighbours, about the development of environmental management and the environmental aspects of all activities at the Malsfeld-Beiseförth site. We also offer this updated environmental statement for download on the Internet (www.schumacher-online.com). This gives you an insight into the development of significant environmental impacts as well as the implementation and updating of our environmental goals.

Dr. Schumacher GmbH
Managing Directors

Dierk Schumacher Dirk Hamenstädt

Dr. Schumacher GmbH



Further investments are shown in the figure above

Dr. Schumacher GmbH was founded in 1978 by Dr Henning Schumacher, the father of today's Managing Director Dierk Schumacher. It develops, produces and distributes disinfectants and cleaning agents marketed as biocides, medical goods, pharmaceuticals and detergents. Cosmetic products are also manufactured at the site.

The company primarily supplies professional customers in the medical field. Wet wipes for a variety of applications, such as in the cosmetics industry, are produced at a different site in which Dr. Schumacher GmbH has a participating interest. The Malsfeld-Beiseförth site is located about 30 km south of Kassel and 5 km east of the A7 motorway. The site, which is surrounded by residential areas, employs around 380 people. In addition to offices, production and storage facilities are also located there.

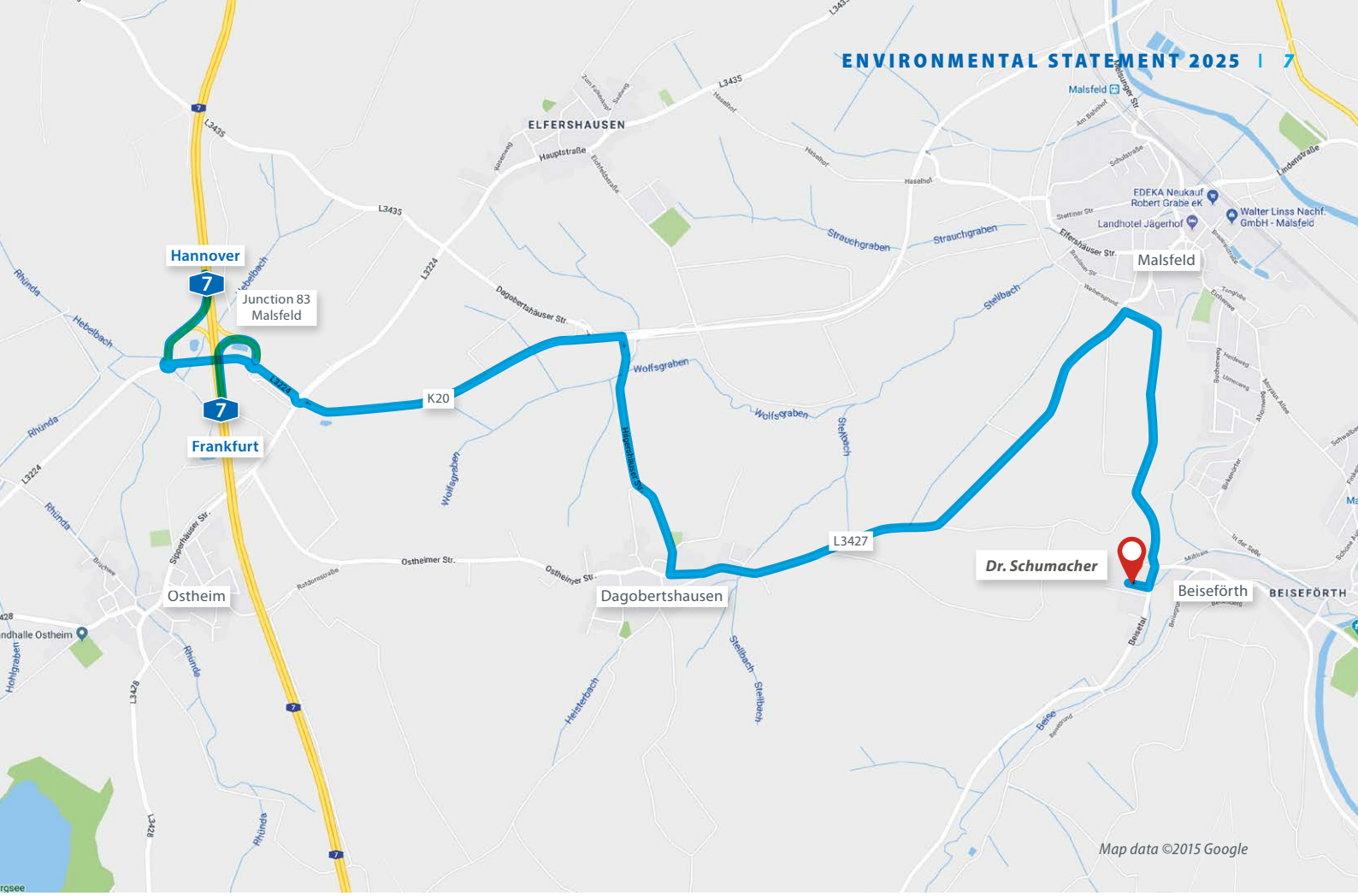
As a manufacturer of skin and hand disinfectants, the production site is subject to pharmaceutical legislation. A manufacturing licence has been issued by the Darmstadt Regional Council for the production of pharmaceuticals. Furthermore, disinfectants (biocides, medical goods), cleaning agents (medical goods, detergents) and cosmetics are produced at the site.

Due to the production of more than 5 tonnes of biocides per day, the site is subject to the 4th Federal Imissions Protection Ordinance (4th BImSchV). The application for a modification permit in accordance with Section 16 BImSchG was approved by the Kassel Regional Council on 20/01/2023. During the reporting year, parts of the permit were already implemented and the commissioning of these facilities was reported to the authorities. The further implementation of the permit and the associated conditions will be carried out in close consultation with the authorities.

More than 200 tonnes of environmentally hazardous substances or mixtures are stored at the site. For this reason, Dr. Schumacher GmbH is a company that falls under the 12th Federal Imission Control Ordinance (12th BImSchV = Hazardous Incidents Ordinance). Due to construction work, the company is currently subject to annual official monitoring. The most recent monitoring visit took place on 21/05/2024 and focused on water law and unauthorised access options. No serious deficiencies that could prevent the safe operation of the company were identified. The areas for potential improvement identified were related to minor construction work and the updating of documents. These deficiencies were rectified by the end of the reporting year. Since all imission law issues have now been checked at least once during each annual monitoring visit and no serious deficiencies have been identified, the authorities were able to extend the inspection interval to three years. The next regular monitoring visit is therefore planned for 2027.

The premises, which are not classified as a water protection area, are located about 100 metres from a drainage ditch (Mühlgraben) that empties into the Beise, which in turn flows into the Fulda about 3 km away. Sanitary wastewater is channelled into the municipal sewage system.

Both the raw materials and the products are considered to be hazardous substances or hazardous goods under chemicals and transport legislation, which can pose a potential hazard to people and the environment. Some of our waste (such as laboratory and oil waste) is also considered hazardous under the Law on Life-Cycle Management and is, therefore, disposed of properly only by certified specialist disposal companies. When handling substances that are hazardous to water, we pay particular attention to the relevant federal ordinance.



Beiseförth site, map data ©2015 Google

As part of the emergency management system, fire protection plans approved by the building supervisory authority are in place. Smoke and heat ventilation systems, a fire alarm centre, emergency regulations, escape and rescue route plans, fire extinguishing equipment, escape route signage, etc., are in place. The structural measures ensure that extinguishing water is retained to the extent required by law in all areas where products are manufactured and bottled, bulk goods are stored temporarily, or finished products are warehoused. The staging area in the shipping zone is connected to the retention system of the warehouse via a channel. This guarantees that sufficient extinguishing water is available in the event of a fire.

To ensure the safe operation of the facilities, the provisions of the Industrial Safety Ordinance are strictly adhered to. So our employees do not suffer any health damage as a result of their work at the site, we comply with the occupational and health safety regulations of the state and trade associations.

Other relevant standards, requirements and legal stipulations are recorded in a list that is regularly reviewed to ensure it is up-to-date and applicable.

The most important environmental laws are the Federal Imissions Control Act (BImSchG) and the ordinances based on it, in particular the 4th and 12th BImSchV. Furthermore, the Ordinance on Facilities for Handling Substances Hazardous to Water (AwSV) is of great importance. Compliance with these legal standards is confirmed.

Dr. Schumacher GmbH is a manufacturing company. Investments and acquisitions are therefore primarily made in order to provide for further production and the relevant services. Business risks and chances are evaluated internally and contribute to the decision-making process. The most important non-financial performance indicators are the manufacturing of safe and high-performance products.

The social aspects of our company are described in the company policy below.

Company policy

We want to be a fair partner to our customers. This includes:

- *Development, production and distribution of effective, easy-to-use products that are as environmentally friendly and cost-effective as possible*
- *Provision of services that are as customised and customer-oriented as possible in consulting and training*
- *Continuous feedback with users, the scientific community and authorities*
- *Fulfilment of customer requirements, as well as legal and regulatory requirements*
- *Determining and implementing specific quality requirements*

The quality and reliability of our products and services have a significant influence on the success of our company and thus on the security of our employees' jobs. We want to achieve sustainable economic success in our business activities, taking proper account of the concerns of quality management in conjunction with those of environmental, occupational and health protection. We also expect this from our suppliers.

In compliance with the applicable regulatory requirements, we are committed to meeting customer requirements and maintaining the effectiveness of our quality management system. The quality of our products and services meets the latest technological standards. In this, we strictly adhere to external quality requirements and standards that arise from legal requirements, customers' quality expectations and voluntary commitments. Product safety and compliance with the specified standards and internal specifications, as well as customer and consumer satisfaction, are therefore our top priorities. We are committed to maintaining the buildings, machinery and equipment at a level that minimises the risk of product quality issues and risk to employees. We comply with GMP requirements when manufacturing our products.

We endeavour to minimise our consumption of raw materials, energy and water. We are also committed to assessing, controlling and reducing environmentally relevant impacts, as well as to avoiding or minimising emissions, waste, wastewater and noise. In addition to complying with the relevant standards, conditions and legal requirements, we are committed to continuously improving the quality of our products and our company's environmental and occupational safety performance. Our employees are an important factor in our success: as active participants in the company's operations, they ensure that we achieve our goals. Protecting the health of our employees, preventing accidents at work and assessing risks at the workplace are very important to us.

With regard to the production of wet wipes for some of our customers, we also undertake to implement, maintain, define and document the chain of custody requirements of the PEFC ST 2002:2020 standard and the FSC standard 'FSC Standard for Chain of Custody Certification' (FSC-STD-40-004). For the time being, the 'physical separation' method or the 'transfer system' will be used for the PEFC with regard to the FSC.

We are committed to upholding the social and ethical standards set out in SA 8000 and the relevant applicable legal standards. We oppose child labour, all forms of forced labour and all forms of discrimination, regardless of the reasons. In fact, we support the right to freedom of assembly and freedom of expression. We treat our employees with respect because the long-term success of the company can only be ensured if our employees feel comfortable in every respect in the company. We do not tolerate corruption in any form. We also expect our suppliers to comply with these standards, and we check this through spot audits, among other things.

We are committed to complying with the current version of the RSPO (Roundtable on Sustainable Palm Oil) standard. We use the 'Mass Balance' supply chain model for this. We place great value on information, motivation and training for our employees, who work together openly and constructively in cross-departmental teams. We ensure that these guidelines are adhered to through regular assessments. If there are any deviations, we carry out the necessary corrections.

Malsfeld-Beiseförth, 27/01/2025

Dierk Schumacher *Dirk Hamenstädt*

Environmental management system

A Management Officer has been appointed to oversee the standardised introduction and implementation of the Integrated Management System (IMS). While the company's specialist and managerial staff (line managers) are responsible for the correct fulfilment of environmental and safety obligations, additional officers and specialists (staff positions) have been appointed for a number of tasks that are prescribed by law: e.g., occupational safety specialist, company doctor, first aider, safety officer, fire protection officer, emissions control officer, hazardous incidents officer, waste management officer. The role of the fire safety officer was outsourced to an external service provider, but this provider terminated the contract during the reporting year. The appointment of a new fire safety officer is planned for the first quarter of 2025. Until then, responsibility for this lies temporarily with the Managing Directors. Due to a lack of resources, the search for a new fire protection officer has proven difficult. But this problem has now been solved. The topics relevant to fire protection were addressed and dealt with in the best possible way in collaboration with the occupational safety specialist and in the ASA meetings.

The processes for implementing the IMS, as described in a manual, are designed to achieve continuous improvement. The underlying methodology is also referred to as the PDCA cycle. This is achieved through consistent planning by formulating goals and programmes based on company policy (plan). Dr. Schumacher GmbH's company policy provides the framework for setting and evaluating objectives and is communicated to all employees, including those working on behalf of the company. Its implementation is geared towards optimising the respective processes (Do). Implementing corrective measures in the event of deviations (check) and evaluating the system's performance regularly (act) are the 'engine' of the system.

Assessment of risks and chances

Risks/chances	Category	Evaluation (Probability of occurrence)	Evaluation (Impact)	Need for action
R: Increased energy demand and thus deterioration of environmental performance due to heat waves and increased energy demand for air conditioning as a result of this.	Environmental events	Event may occur on a maximum of 20 days per year. This seems acceptable	Low impact, as energy peaks are predictable.	None
R: Impairments due to severe weather events (heavy rain, storms, snow)	Environmental events	Occurrence is unlikely	The new building was constructed in accordance with TRAS 320 ('Precautions and measures to be taken with regard to hazards, wind, snow and ice loads'). Therefore, a minor impact is expected.	
R: A hazardous incidence occurs; uncontrolled release of hazardous substances/business interruption	Emissions protection, emergency precautions	Occurrence is unlikely	Impact would be catastrophic	None; measures specified in SOP; annual training carried out
R: Occupational accidents occur	Occupational safety	Occupational accidents occur occasionally (under 10/year)	Occupational accidents can have serious consequences	Take more preventive measures and provide more training. Create additional operating instructions. Avoiding overburdening employees.
R: Overburdening employees causing a drop in motivation with regard to environmental issues	Internal topics/existing knowledge in the company	Low, as environmentally relevant processes (e.g., disposal routes) are largely defined.	The impact can be significant if hazardous substances are discharged into the sewage system.	'Regular training courses that take into account topics relevant to environmental and labour law'
R: High costs/penalties for ad hoc or retrospective implementation of new legal requirements	Internal topics/existing knowledge in the company	Relatively high, due to the wide range of innovations. Environmental newsletters often focus on side issues, so significant changes may be overlooked.	The impact can be severe (e.g., missing permits)	'More external support that provides information about relevant changes in legislation.' Attending more external events on environmental law. More personnel resources'

Stakeholder analysis

Interested party	Expectations/requirements	Meaning
Personnel	'Safe workplace; decent salary; decent working environment'	High
Local residents	'Noise reduction, minimal disruption to living conditions'	Medium
The public	'Transparent communication and easily accessible information about the company; social and ecological sustainability'	Medium
Authorities	'Respect for applicable law (including environmental and labour law) and direct notification in the event of violations; timely response to requests'	High
Authorities	Observance and implementation of requirements arising from exceptional circumstances.	Medium
Customers	Compliance with environmental, labour and socio-ethical production standards. Fulfilment of all legal and normative requirements relevant to the products.	High
Customers	'Supply of safe products that fulfil the advertised properties and are manufactured in a manner that is as environmentally friendly as possible at reasonable prices; professional and qualified advice; provision of necessary services (e.g., product training; support with foreign registrations)'	High
Suppliers	'Not aware of any expectations from suppliers that set requirements regarding the environment, occupational safety or compliance with normative standards'	Low
Banks	Expectation of solid financial planning by the company, ideally while maintaining the high equity ratio.	High
Insurances	Compliance with the product, environmental and occupational safety requirements and the corresponding additional standards and guidelines	High
'Shareholder/owner'	Further development and expansion of the company while maintaining a solid financial basis	High
Occupational physician, employers' liability insurance association, occupational safety specialist	Compliance with occupational health and safety regulations; implementation of preventive measures to avoid occupational accidents and long-term damage to employees that could lead to work-related incapacity to work.	High
Emergency services (fire brigade)	Immediate receipt of all important information relevant in the event of an emergency response.	High
Certifier/notified bodies	'Compliance with applicable law (including environmental and labour law), any harmonised standards or other requirements that form the basis for the respective certification.'	High

	'Risks/ chances'	Suggested activities
	'R: Partially high capital expenditure; internal reorganisation required. C: Increased motivation among employees through strong identification with the company'	Actively involve employees in setting environmental, quality and occupational safety targets and communicate their implementation internally in a targeted manner; promote occupational safety and expand preventive measures; optimise office planning
	'R: Conflicts and litigations if complaints are neglected or the interests of local residents are disregarded C: Avoiding conflicts and litigations through cooperative action; image boost'	'Reduction of incoming and outgoing traffic through optimised route planning and utilisation; internal transport using electric forklifts instead of diesel-powered forklifts in the morning and evening hours Optimising safety plan through, for example, more intense communication with the fire department.'
	'R: Disclosure of confidential information C: Gain of trust among local residents and greater tolerance vis-à-vis short-term negative effects in production.'	'Expansion of external communication, e.g., direct communication with local residents (e.g., in the case of construction projects) 'Professionalisation' of external communication; better preparation for crises (e.g., creation of a 'shadow homepage' for emergencies)'
	'R: Stricter requirements and extended approval processes, more frequent on-site inspections if information is withheld C: Simplified approval processes and better collaboration with active and open communication C: Receipt of information about new legal developments'	Active communication with the authorities, e.g., when attending specialist events held by the authorities; active participation in environmental or occupational safety and health committees (e.g., Environmental working group for North Hesse)
	'R: High requirements, restriction of business activities C: Strengthening of the market position; improvement of reputation with the authorities'	Long-term implementation of a crisis management team; definition of a procedure for special measures, including a definition of which departments need to be involved.
	'C: Strengthening of customer loyalty through credible commitment'	Maintenance of environmental, labour and socio-ethical certifications
	'C: Strengthening of customer loyalty through credible, secure products'	Sustainable product development; development of innovative products with new active ingredients to replace 'old' products with hazardous active ingredients (e.g., aldehyde-based products)
	'Implementation of the Supply Chain Due Diligence Act'	No need for action
	'R: Administrative effort; high investments in new construction C: Provision of favourable loans; maintaining the solid financial basis of the company'	Continuing the far-sighted cost planning for the individual departments and sales planning for the different sales areas.
	'R: Effort to communicate compliance with the requirements C: Safeguarding the company in the event of damage'	Installing a sprinkler system in the high-bay warehouse or implementing an alternative solution
	'R: Providing sufficient resources for further expansion (in particular, qualified personnel who also have experience from 'outside' the industry regarding industry-related requirements). C: Long-term survival of the company.'	'Forward-looking strategic corporate planning, in which employees are also involved in the main features. Provision of sufficient resources for further expansion (in particular, qualified personnel who also bring along experience for industry-related requirements from 'outside').'
	'R: Capital expenditure C: Cost savings through, e.g., lower contributions to the employers' liability insurance association; increase in employee motivation'	Increased implementation of preventive measures with regard to occupational health and safety
	'R: None C: Minimisation of the impact of an emergency or hazardous incident'	Conduct emergency drills with the fire brigade
	'R: Loss of the certification C: Maintaining the certification is an image booster; cost savings and increased security through definition and adherence to the relevant processes'	Maintain documentation and certifications.

Environmental aspects

Environmental aspects mean the components of a company's activities, products or services that have or may have an impact on the environment. These primarily arise from the life cycle of the products and are assessed on the basis of possible ecological, economic and social damage.

The following criteria are used to assess the environmental aspects relevant to our company:

1. Environmental hazard potential: the specific risk for the environment that arises from the environmental aspect, standardised in terms of quantity.
2. Environmental vulnerability: sensitivity of the environment vis-à-vis the aspect introduced into the environment by the company.
3. Extent, number, frequency and reversibility: impact taking into account the absolute quantity and with regard to whether this impact is reversible.
4. Legal requirements: the existence of environmental regulations that must be complied with.
5. Social requirements: importance for interested parties. Particular attention is paid to local residents and employees.

The evaluation of the environmental aspects is compared with the potential for improvement within the company. The environmental goals and the environmental programme are then derived from this, with the highest priority given to aspects of high importance on which the company has a major influence on improvement.

Presentation of environmental aspects:

Environmental aspect	Environmental consequence	Category	Opportunity for improvement
Direct aspects			
Energy use/energy efficiency	Resource consumption, in particular due to fossil fuels	I	1
Water	Consumption of resources	I	1
Waste	Impact of waste management on the landscape	I	2
Soil	Sealing of ground surfaces	I	1
Discharges to sewage	Consumption of resources	I	1
Emissions	Contribution to global warming	I	1
Noise	Pollution affecting local residents as an interested party	II	1
Water-polluting substances, hazardous substances, hazardous goods	Environmental pollution (soil, water, air) during production, use and disposal	III	2
Accidents and potential emergencies with an impact on the environment	Impact on the environment, local residents and employees	III	2
Impact on biodiversity	Impact on fauna and flora	I	1
Product-related aspects (Choice of packaging, ingredients)	Use of resources by suppliers	I	2
Indirect aspects			
Product-related aspects (transport, use, disposal)	Disposal of products by customers	I	1
Environmental behaviour of suppliers and service providers	Production at suppliers or service providers	I	1
Waste	Generation of emissions (external)	I	1

Direct environmental aspects

Specific energy consumption (electricity), i.e., the amount consumed in relation to the production volume, can be reduced in particular by optimising the filling lines. More efficient lines can be used to fill individual containers more systematically and therefore also more energy-efficiently. Due to the current range of machinery, it no longer appears possible at present to reduce energy consumption further in terms of electricity. However, the acquisition of further production facilities is also planned as part of the expansion measures. Energy consumption has an impact on the consumption of non-renewable energy sources. That is why we are striving for an energy supply with an increasing proportion of renewable energies.

In the case of fossil fuels, the consumption of diesel fuel is a particularly important parameter. This is not generated directly at the site, but by field staff or trips from site to site, but it is still taken into account in this environmental statement. Consumption can be reduced by optimising route planning and converting part of the vehicle fleet to cars with alternative drive systems.

To minimise the increase in heating oil consumption, despite the expansion of operations, an energy recovery system has been installed in the new building to recover the energy from the extracted air. This will also be integrated into existing buildings. With regard to waste disposal, consistent and professional disposal of waste is ensured. Thereby, recycling is given preference over disposal, provided that this is feasible. There is no direct discharge into or abstraction from watercourses. Wastewater will continue to be disposed of as hazardous waste via appropriate specialised waste management companies in accordance with the applicable legal standards. Waste products are already largely separated so that the requirements of the Commercial Waste Ordinance are met.

Since our facilities do not cause any noise pollution that could negatively affect our neighbours, the noise generated by vehicle traffic on our premises is a perceptible source of noise. However, this is not considered to be significant because goods are only transported during the day from 7:00 a.m. to 3:00 p.m. As part of the new construction project, a noise forecast was prepared in accordance with the Technical Instruction on Noise Abatement, which shows that the guideline values are not expected to be exceeded during the day. The slight breaches originally predicted for nighttime hours have been avoided through structural measures. Should there be complaints from neighbours, these will be evaluated and, wherever possible, measures will be taken to minimise any inconvenience to neighbours. The noise limits according to the existing building permits are being adhered to.

Production-related odours and dust pollution, which could lead to a negative impact on the environment and a nuisance to local residents, do not occur as a result of production. Due to transport, noise from lorry traffic cannot be avoided. However, we try to limit noise pollution as much as possible by operating at full capacity and restricting driving times.

As a result of the construction work, approximately 10,000 square metres of the total property area of approximately 18,500 square metres are now developed. Another construction project is planned for the long term: the expansion of the high-bay warehouse. The foundation work for this has already been carried out in accordance with an existing building permit. Due to the current global situation, it is not foreseeable when the next construction phase of the high-bay warehouse will commence. We avoid ground sealing as much as possible on outdoor surfaces such as car parks, as ground sealing generally contributes to the loss of natural habitats.

The company is geographically located in an area where rare animals or plants are not expected to settle, as there are no nature reserves or biotopes in the immediate vicinity. An impact on biological diversity is, therefore, not expected.

There is a potential risk to the environment from fire or leakage due to the company's activities. However, this risk has been minimised to an unavoidable residual risk through various measures, such as the establishment of a fire alarm centre, the installation of fire extinguishers as well as placement of the preparation and storage tanks in catch basins, and the development of the hall floor as a liquid-tight catch basin.

Measures are also being taken on the organisational side to avoid hazardous incidents from occurring and to be able to react quickly and systematically in the event of incidents by implementing security and emergency plans and continuously updating security reports.

The company is, of course, available to answer any questions or respond to any suggestions from the municipality or local residents.

Indirect environmental aspects

The following indirect environmental aspects are relevant to our business activities:

1. Product-related effects (for the user)

- In particular, the use of hazardous substances is unavoidable in the production of disinfectants. However, the proportion of these substances in the product is kept as low as possible. In addition, regular assessments are carried out to determine whether it is possible to replace less hazardous substances.
- With regard to cleaning agents, our products sustainably fulfil the requirements of the A.I.S.E.
- The product solutions are fed into the user's sewage treatment plant via the sewer system as intended. Wherever possible, raw materials are selected on the basis of their biodegradability, thus minimising environmental pollution. According to the safety data sheets, residues of disinfectant concentrates must be disposed of by the customer as hazardous waste, taking into account local requirements.
- The packaging consists mainly of recyclable components and we are constantly working to increase the recyclability of our packaging. This is to ensure that the emptied packaging can be recycled via return systems. We are also working on increasing the proportion of recycled material in our packaging in line with current and future legal requirements.

2. Effects on suppliers

Environmental performance is taken into account when selecting suppliers. When it comes to awarding contracts, a supplier who is certified according to DIN EN ISO 14001 or EMAS is rated more positively in the supplier evaluation and is given preference over a supplier with an equivalent performance profile who cannot provide this certification. We also endeavour to keep transport distances as short as possible in the course of procurement. On the one hand, this is achieved by delivering the raw materials as much as possible directly to the plant where the goods are needed. On the other hand, we endeavour to procure the goods from companies in close geographical proximity to us.

Environmental performance

Core indicators are considered to be energy consumption, material consumption and the generation of emissions and waste. In addition, land usage with regard to biological diversity is considered.

Energy consumption is calculated based on the consumption of electricity, which has been obtained from 100% renewable sources since 2013, diesel fuel and heating oil. Electricity consumption is calculated from the respective monthly consumption bills. The consumption of diesel fuel is determined from the diesel deliveries for the company's own small petrol station and from the internal diesel account of the various vehicles, taking into account the inventory stocks at the beginning of each year and the average price of the diesel deliveries (1 litre of diesel = 0.00971 MWh). The consumption of heating oil is calculated as the sum of the deliveries during the year, taking into account the inventory stocks (1 litre of heating oil = 0.009971 MWh).

Material consumption takes into account the consumption of chemical raw materials, primary packaging made of plastic and secondary packaging made of cardboard, which are required for producing the finished goods. Trade goods are also taken into account. The calculation is based on a software evaluation from the internal merchandise management system.

Water consumption is considered to be the total consumption recorded by the respective water meters during the year. This includes not only the water that goes into the products, but also the water that is discharged into the sewage system as wastewater during water treatment. For the resulting water, which falls under Annex 31 of the Wastewater Ordinance, a notification was made in 2018 in accordance with Annex 11 of the Indirect Disposal Administrative Order (VwV).

Waste is calculated as the sum of the weights of the various waste fractions collected during the year. Emissions (Scope 1 and 2 according to the GHG Protocol) were calculated based on the consumption of electricity, heating oil and diesel fuel (expressed in CO_2 equivalents; 1 kWh electricity = 0 kg CO_2; 1 litre of heating oil = 3.119 kg CO_2; 1 litre of diesel = 2.639 kg CO_2). Land usage is calculated by adding the footprint of each building in relation to the total size of the property. The following table (on page 14) shows the input-output balance for the years 2017 to 2024.

The reference value (Figure B according to EU Regulation 2018/2026) is the total annual output quantity (production quantity in tonnes), as this best reflects the total annual activity.

Production volumes declined overall after the period of the pandemic. On the one hand, this is due to the relocation of production to the

subsidiary company. On the other hand, customers stocked up heavily on disinfectants after the pandemic, and these will need to be replaced once they have expired, so an increase in production volumes can be expected in the future. The fact that these stocks have now been depleted in many cases was definitely one reason why 2024 was the first year since the pandemic to see an increase in production volumes.

Input-output balance for the years 2017 to 2024

Parameters	2017	2018	2019	2020[c]	2021[c]	2022	2023	2024
Total energy (MWh) Total final energy	3,500	3,605	4,748	3,653	5,010	3,436	3,036	3,619
according to EnEfG (MWh)	n.a.	n.a.	n.a.	n.a.	2,991	2,224	1,733	1,859
Electricity (MWh)	831	772	1,283	1,398	1,253	1,027	866	887
Heating oil (litres)	63,905	65,789	148,572	118,269	158,663	98,874	67,896	80,607
Diesel (litres)	209,202	224,144	204,278	110,812	223,918	146,612	153,812	198,644
Energy efficiency [kWh/t prod.	267	257	321	156	439	345	359	364
Energy eff.[MWh/employee]	13.0	12.0	13.7	8.7	11.9	8.1	7.9	9.4
Total share of renew. en. [%]	23.70	21.4	27.0	38.3	25.0	29.9	28.5	24.5
Mass flow (each in t)								
Raw materials	5,555	5,960	6,408	11,152	4,979	4,503	3,101	3,922
Trade goods	2,304	2,085	2,336	3,174	1,982	1,839	2,051	2,469
Packaging materials, of which:	918	948	963	1,573	755	731	482	637
Cardboard, paper	243	253	251	397	204	210	145	190
Plastic	675	696	712	1,176	551	521	337	447
Indicator of mass flow [e]	0.67	0.64	0.66	0.68	0.61	0.71	0.67	0.71
Total water consumption (m³)	10,985	15,604	20,137	27,817	15,707	14,297	12,659	13,782
Total waste (t)	approx. 953	approx. 907	approx. 1,023	approx. 1,466	approx. 941	636	562	665
Paper, cardboard (150101)	65	69	76	105	57	61	47	70
Plastic (150102)	24	22	28	30	14	14	11	13
Mixed municipal waste (200301) [a]	approx. 75	approx. 75	approx. 125	approx. 175	approx. 120	25	20	35
Hazardous waste:								
Laboratory chem. (160506[d])	17	18	18	22	6	7	0	0
Glass packaging (150110[d])	0.1	0	0.2	0	0	0.6	0.4	0.4
Prod. wast. (161003[d])	739	714	760	1,009	743	527	483	541
Oil wastes (130205[d])	0	0	0	0	0	2	0	9
Wastewater [b]	approx. 535	n.a.	n.a.	n.a.	n.a.	6,126	5,515	5,349
Emissions (t CO_2, heating oil, diesel, electricity)	751	797	1,002	661	1,086	695	694	704
VOC (t)	52.8	53.1	52.4	62.8	52.5	21.6	15.0	21.2
Products (t)	13,107	13,995	14,789	23,486	11,418	9,960	8,457	9,956
Miscellaneous								
Land usage (m²)	7,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000
Unsealed area (m²)	4000	4,000	4,000	4,000	4,000	4,000	4,000	4,000
Natural area (m²)	7,000	6,000	6,000	6,000	6,000	6,000	6,000	6,000

a On 01/07/2022, the disposal of municipal waste was changed from emptying (mobile container) to weighing (press container). Quantities were calculated by extrapolating the half-year quantity to the annual quantity. Weighing meant the quantity could be quantified for the first time. It turned out that the quantities for previous years were set too high.

b Via wastewater meter. There has been no wastewater meter since 2018 because the metering station was removed during the construction of the new building. The wastewater was not recorded separately. However, a wastewater charge, including a wastewater surcharge, is paid for all water that is not used in the products in consultation with the municipality of Malsfeld. In 2021, the wasterwater metering system was adjusted and was under review. Since 2022, wastewater has been recorded using this metering system.

c The basis for calculation has changed due to an increase in the number of employees.

d Hazardous waste.

e Material efficiency is the reciprocal value of the mass flow.

Mass flow

Environmental performance is taken into account when selecting suppliers. When it comes to awarding contracts, a supplier who is certified according to DIN EN ISO 14001 or EMAS is rated more positively in the supplier evaluation and is given preference over a supplier with an equivalent performance profile who cannot provide this certification. We also endeavour to keep transport distances as short as possible in the course of procurement. On the one hand, this is achieved by delivering the raw materials as much as possible directly to the plant where the goods are needed. On the other hand, we endeavour to procure the goods from companies in close geographical proximity to us.

Energy efficiency

The absolute total energy consumption in 2024 is in the range of pre-pandemic years (2016 – 2018). This is remarkable, as the new building was not completed, or at least not fully completed, during these years, and therefore fewer rooms and buildings had to be supplied with energy (electricity, heating oil).

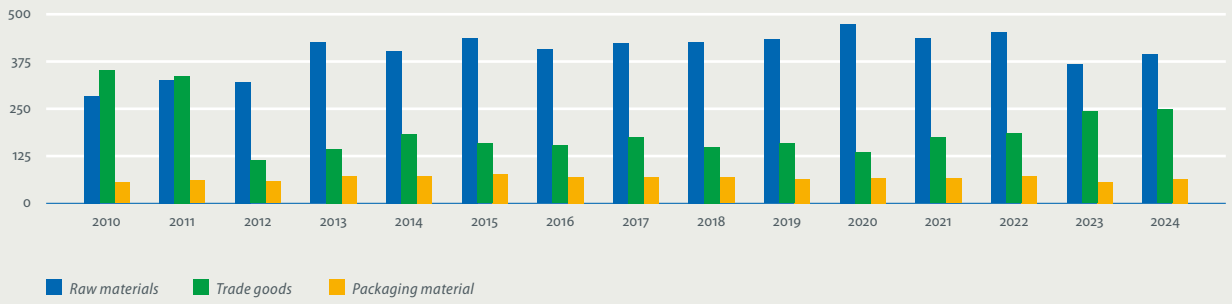
At 9.4, energy efficiency per employee has increased compared to previous years. This is due, in particular, to the renewed increase in diesel consumption in addition to an increase in the consumption of heating oil due to the weather. This reflects the increased activities of the field staff in particular. The success of the activities can be seen in the increased production volumes, so that any additional consumption is economically justified.

Although heating oil consumption increased year-on-year due to the weather, it is still well below the consumption levels of 2019 – 2021. The positive effects of the measures taken, such as the throttling of ventilation systems and the reduction of room temperature to the widely recommended value of 19 °C, continue to be clearly noticeable. To become independent of these external influences, opportunities to convert heat generation to renewable sources should continue to be exploited.

As mentioned, diesel consumption has returned to pre-pandemic levels due to increased travel by field staff. The consumption of diesel fuel and heating oil has a negative effect in two ways. On the one hand, it is a non-renewable energy source, and, on the other, exhaust gases damaging to climate and health are produced during combustion, so a further minimisation of the consumption of diesel fuel and/or heating

Mass flow

kg/t product



oil should continue to be a goal. In the longer term, the intention is to increase the use of renewable or non-fossil energy sources.

In contrast, specific energy consumption is rather unremarkable compared to pre-pandemic years due to the comparatively low production volumes. This is understandable, however, since basic energy consumption (e.g., heating buildings) and travel by field staff tend to be independent of production volumes.

Electricity consumption has risen in line with the increased production volume but remains at a low level overall. As 100% of the electricity continues to be generated from renewable energy sources, the share of renewable energy remains at a gratifying level of 24.5%.

We will continue to try to further reduce energy consumption in the coming years.

On 1October 2022, the Ordinance on the Security of Energy Supply through Medium-Term Effective Measures (EnSimiMaV) came into force. This meant companies were obliged to implement measures that were assessed as economically feasible in accordance with Section 4 (1), provided that their total energy consumption over the last three years averaged more than 10 GWh per year. This value has never been exceeded in the company so no measures were required pursuant to this regulation. The regulation expired on 30/09/2024.

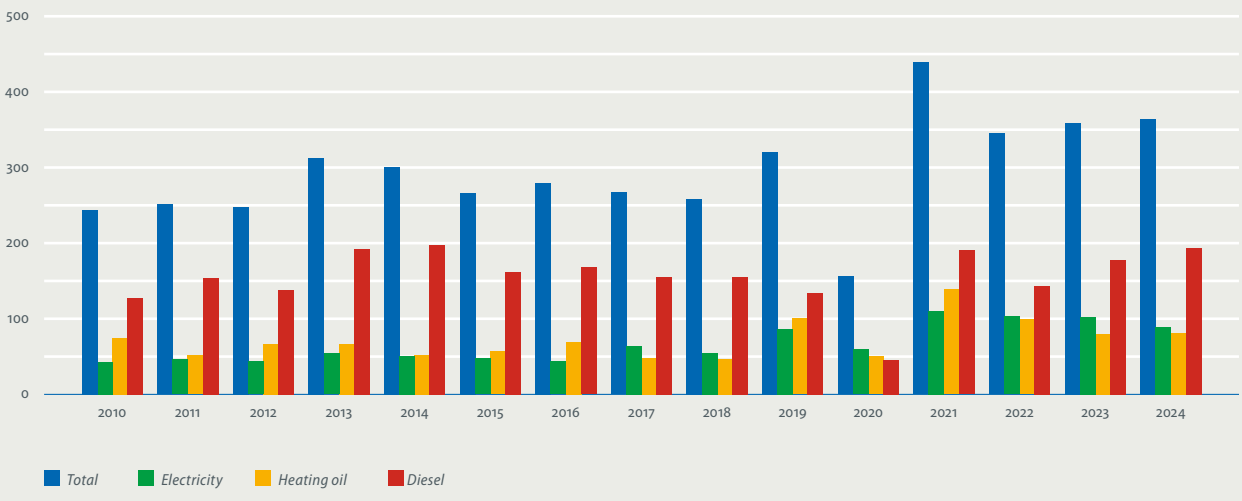
The Energy Efficiency Act (EnEfG) came into force on 18/11/2023. According to Section 8 (1) of this law, companies are obliged to implement an environmental management system if their average total final energy consumption over the last three calendar years exceeded 7.5 GWh. Although the company's consumption was below 7.5 GWh, it has voluntarily had a certified environmental management system in place since 2010.

Furthermore, according to Section 9 EnEfG, companies with an average total final energy consumption of more than 2.5 GWh per year within the last three calendar years are obliged to create and publish specific, feasible implementation plans for all final energy-saving measures identified as economically viable within three years at the latest.

Since no energy is transferred, these were calculated on the basis of electricity, heating oil and diesel consumption. In the case of diesel, energy consumption of company cars that are also used privately can be disregarded in accordance with Point 3.3 of the BAFA information leaflet for determining the total final energy consumption (as of 17/07/2024). On this basis, the values for the total final energy specified in the data table are calculated according to EnEfG. The average values were 2.316 GWh as of 01/01/2024 (i.e., for the years 2021 – 2023) and 1.938 GWh as of 01/01/2025 (i.e., for the years 2022 – 2024), therefore below the value of 2.5 GWh in each case.

Energy consumption

kWh energy/t product



Water consumption/wastewater

The majority of water is required for product manufacturing. In the period under review, absolute water consumption in 2024 increased in proportion to the increase in production volume compared to 2023. The majority of the total water consumed has always gone into the products. As the following chart shows, the efficiency of water consumed per tonne of product returned to pre-pandemic levels.

Wastewater from water treatment accounts for the majority of operational wastewater and will continue to be quantified in consultation with the municipality of Malsfeld. In absolute terms, there was a slight decrease in the amount of wastewater compared to the previous year, although total water consumption increased. The savings are primarily due to the water treatment system. The objective of reducing the amount of wastewater was thus achieved. Sanitary wastewater is not included in the table below.

Although water is a renewable resource, its extraction from surface and groundwater affects the natural balance and flow regime. The surface water from sealed areas is channelled into the municipal wastewater system, but the volume is not recorded.

Waste

We see it as an important task to reduce the amount of waste we produce by continuously exploiting all potential ways to avoid waste and recycle the remaining waste. A wide range of (indirect) environmental impacts are associated with waste disposal. This pertains to the emission of gases during transport and combustion, which influence ozone depletion in the stratosphere and the greenhouse effect.

All waste is subject to extensive legal regulations with regard to its generation, storage, transport and disposal (in particular, the Closed Substance Cycle and Waste Management Act and the ordinances issued under it). The requirements resulting from this are met.

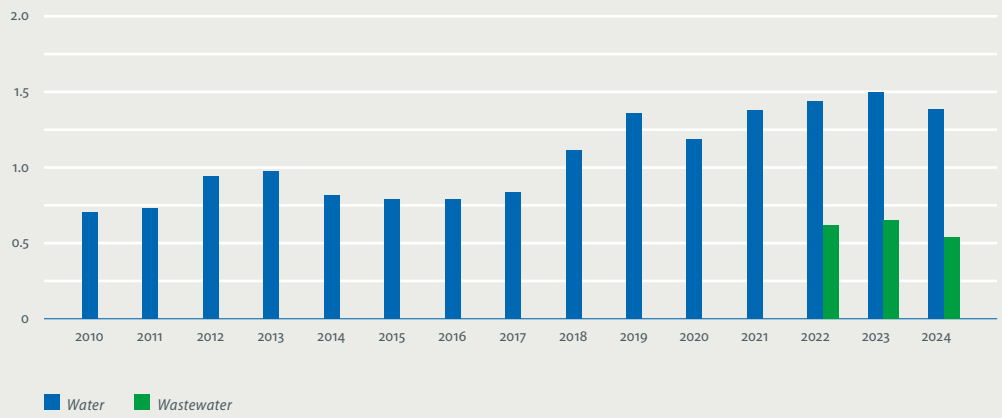
Waste in our company mainly consists of production wastewater, household-like commercial waste (packaging and office waste), paper and cardboard, plastics including film, as well as a small amount of scrap and electronic scrap. In addition, chemical waste is occasionally produced through the disposal of expired retention samples, residues of raw materials that can no longer be used, or semi-finished and finished goods to be discarded.

In the 2024 reporting year, relatively large quantities of containers with oil were also produced. This involved the liquids pumped out of the light liquid separators, which were due for refurbishment and general inspection this year. Nevertheless, oil or oil sludge contamination was very low.

The requirements of the Commercial Waste Ordinance, as amended on 18/04/2017, for separating waste are met.

Water consumption/wastewater

m^3/t product



Further separation of household-type commercial waste is not economically viable and not feasible at a reasonable cost.

Plastic waste mainly originates from plastic packaging. Plastic and film waste is sorted and recycled in accordance with Section 8 (1) and Section 9 (4) of the Closed Substance Cycle and Waste Management Act.

In compliance with legal requirements, we prefer to recycle waste rather than dispose of it. At 17.6%, the recovery rate in 2024 was comparable to that of the previous year. In the reporting year, a relatively large amount of commercial waste, similar to household waste, was disposed of. These were cosmetic wet wipes that were disposed of as non-hazardous waste. Since this is recyclable, non-hazardous waste, an increase has a positive effect on the recycling rate and the proportion of non-hazardous waste in relation to total waste.

The total volume of waste in 2024 compared to 2023 increased only slightly from 636 tonnes to 665 tonnes despite the rather unusual waste mentioned above. This basically means that the long-term trend towards lower amounts of waste is set to continue.

Due to the limited capacity of the Malsfeld municipal sewage treatment plant, production wastewater must be disposed of as hazardous waste via suitable specialised disposal companies. Corresponding individual disposal certificates are available for this. The amount of production wastewater has also increased slightly in proportion to the increase in production volume, but overall, it remains at a relatively low level. In addition to the production 'wastewater' and wastewater with oil mentioned, small quantities of laboratory glass have also been classed as hazardous waste. These contain hazardous substances that have been recycled in return for a collective disposal certificate from the disposal company.

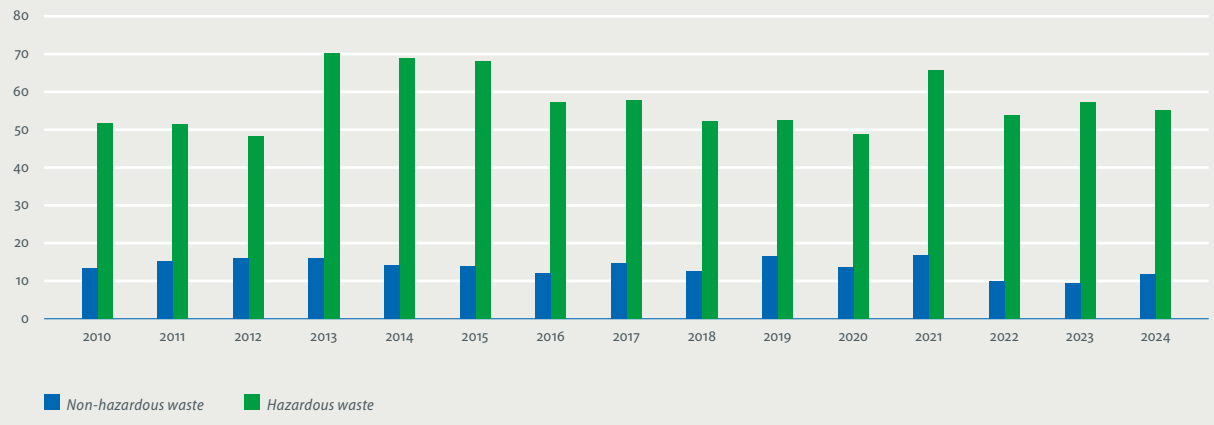
The amount of waste per tonne of product (broken down into hazardous and non-hazardous waste) is shown in the following diagram.

Land use

Of the total site area of 18,500 square metres, approximately 10,000 square metres are developed, including the current extension activities. As is usually the case with construction, ground sealing has an impact on the environment due to reduced water absorption by the soil and can lead to soil erosion. Permits have been obtained for all construction activities, and the conditions imposed by the authorities have been met. The information on natural and unsealed areas is based on estimates.

Waste

kg/t product



Emissions

Emissions have to be minimised because they can affect the climate through the greenhouse effect and the depletion of ozone in the stratosphere, as well as being an unwelcome contributing factor to summer smog.

Our company fulfils the legal requirements, which are based in particular on the BImSchG and the resulting ordinances. The annual report for 2024, in accordance with the 31st BImSchV regarding the production of pharmaceuticals, has already been prepared in due time. The requirements of the 12th BImSchV (as an upper-tier establishment) are also met.

The exhaust air from the filling machines is collected via a central chimney in accordance with the approval procedure under the German Federal Immission Control Act, which has been successfully completed. In the reporting year, the central chimney was increased to 24.2 m in accordance with the new requirements of the 2021 Technical Instructions on Air Quality Control. Regular measurements are used to verify that the legal limits for emissions in the exhaust air are always complied with in each case. These measurements were carried out in 2024 after the vapour recovery system had been installed. In doing so, it was possible to verify compliance with the relevant thresholds. Insofar as no relevant structural changes are made, a subsequent emissions measurement is scheduled for 2027.

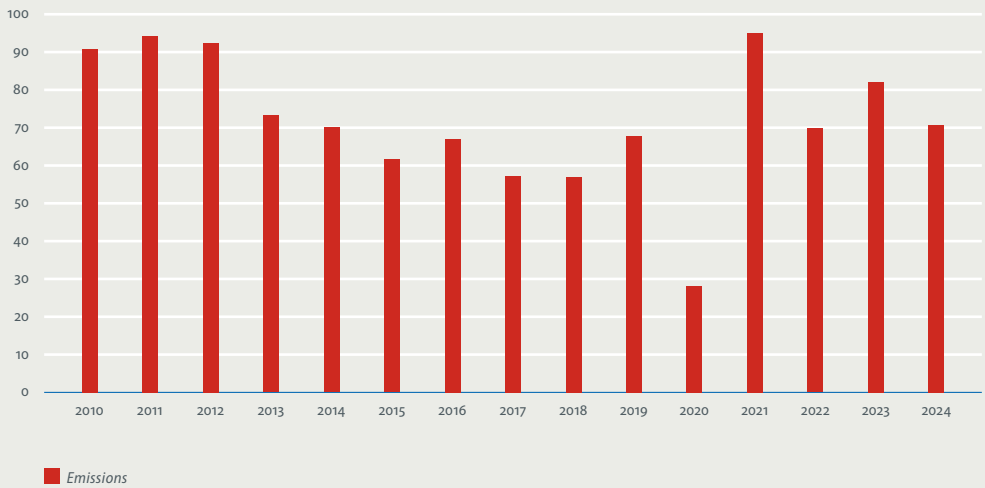
In 2024, a vapour recovery system for pumping airborne pollutants was implemented at the application area in order to meet an official requirement from the immissions law permit.

In terms of emissions, we only consider the consumption of diesel fuel, heating oil and electricity, converted into CO2 equivalents, as no other greenhouse gases (such as methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons) or other emissions (such as NOx, SO2) are generated during production. These types of emissions only arise from motor vehicles and heating oil firing systems, the legally compliant functioning of which is verified by the legally prescribed checks.

In 2024, total CO2 emissions are slightly higher than in 2023 because both heating oil and diesel consumption have increased compared to the previous year. This could not be 'compensated' even by the calculated update of the conversion factors for heating oil and diesel in CO2.

Emissions

kg CO_2/t product



Compliance with threshold values

Electricity consumption increased slightly in line with the production volume.

However, the specific emissions have fallen slightly due to the increased production volume. However, since these are only slightly connected to production volumes, except for electricity, this is only considered a calculated variable.

Emissions from VOCs are also slightly higher in 2024 vis-à-vis 2023. The requirements according to the 31stBImSchV are still being met. This proves that the solvents are being used responsibly.

A solvent balance, as required by the 31st Ordinance for the Imission Control Act (31st BImSchV), is used to verify that the emission limit values are being complied with. The exhaust air systems are regularly inspected. In each case, it was possible to prove that the requirements were met. As described above, the emission control limits were also complied with, as was confirmed by measurements at the collector chimney.

Sanitary wastewater is channelled into the local sewage treatment plant in accordance with the municipality. The production wastewater is disposed of in accordance with the Closed Substance Cycle and Waste Management Act and the Ordinance on Waste Recovery and Disposal Records. A corresponding disposal certificate was issued and the disposal route was accepted by the relevant supervisory authority. Noise pollution thresholds for the surrounding area resulting from the building permits are being adhered to.

Environmental objectives and targets

We endeavour to minimise our consumption of raw materials, energy and water. We are also committed to assessing, controlling and reducing environmentally relevant impacts, as well as to avoiding or minimising emissions, waste, wastewater and noise. We had set ourselves specific targets for 2024 to implement these principles enshrined in our company policy in a practical way. These goals serve to expand and secure the level achieved so far. In the following, we explain the status of the implementation of these goals.

Environmental targets have been defined for the year 2024, the implementation of which is explained as follows:

Main goal

Reduce total energy consumption by 5 % compared to 2023

Measures

See Goals 1 to 2 below

Deadline

December 2024

Responsible party

Management in cooperation with the emission control officer.

Statement

Total energy consumption rose to 3,619 MWh in the 2024 reporting year (2023: 3,036 MWh). This was due to the weather-related rise in heating oil consumption and an increase in diesel consumption, which is attributable, in particular, to increased field service activities. For reasons of capacity, the planned measures could not be implemented at such short notice. Against the backdrop of future sustainability reporting, the goal will be retained in principle, but with a different time horizon.

Further goals

1. Goal

Reduce heating oil consumption by at least 5 % compared to 2023

Measures

Consideration is being placed on installing heat pumps to transfer energy from internal heat sources to other company buildings. Details will be provided from a consultation on energy through an external service provider. Other options include the installation of solar thermal systems.

Deadline

December 2024

Responsible party

Management in cooperation with the emission control officer

Statement

Heating oil consumption increased by 19% in 2024 vis-à-vis 2023. This can primarily be attributed to weather-related influences. The measures stated above could not be implemented due to a lack of resources. In principle, however, the goal of saving energy is being maintained, although the time horizon is being extended.

2. Goal

Reduce diesel consumption of company vehicles by at least 3 % compared to 2023

Measures

Motor vehicles, primarily used for short distances, are being replaced by vehicles that do not rely solely on fossil fuels.
Optimisation of the travel behaviour of employees most severely affected. Provision of greater incentives to use public transport for business trips where this is feasible (e.g., trade fair and conference visits)

Deadline

December 2024

Responsible party

Fleet management in cooperation with management and HR.

Statement

A conversion of the vehicle fleet to electrically operated vehicles is not being carried out due to the range issue and the still inadequate charging infrastructure in many cases. Furthermore, electric vehicles should not be considered uncritically from a sustainability perspective due to the substances contained in their batteries. Diesel consumption in 2024 has increased by 36% vis-à-vis 2023. The goal was therefore not achieved. To achieve a long-term reduction, it is essential to implement longer-term measures and also to raise awareness in all areas of the company.

3. Goal

Intensify preventive measures to prevent accidents at work

Measures

Preventive measures (e.g., drawing up and updating of operating instructions, updating of risk assessments and instructions for employees) are being further intensified, particularly in the areas of production and logistics.

Deadline

December 2024

Responsible party

Occupational safety specialist in cooperation with the hazardous incidents officer and MedWiss.

Statement

In the reporting year, hazard assessments were intensively processed and numerous new operating instructions were drawn up. The instructions on handling hazardous substances were also intensified. The decline in occupational accidents in the reporting year 2024 suggests that the measures are already working. The goal was therefore achieved.

4. Goal

Reduction of wastewater from water treatment plants by 5 % compared to 2023

Measures

The aim is to reduce the amount of wastewater by optimising the device settings and possibly feeding permeate back into the system.

Deadline

December 2024

Responsible party

Production in cooperation with the QU.

Statement

After consultation with the manufacturer of the water treatment system, feeding back the permeate is only possible with a high degree of technical effort, and there is a risk that the high quality requirements can no longer be met. Even so, despite the increase in freshwater consumption and the increase in production volume, the amount of wastewater was still roughly 3% below the amount of wastewater in the previous year. This should be viewed positively.

5. Goal

Development and production of more environmentally friendly disinfectants

Measures

Switch from disinfectants containing quaternary ammonium compounds to more environmentally friendly products based on amines and oxidising agents. The share of these products is expected to increase by 10% in 2024 compared to the share in 2023.

Deadline

December 2024

Responsible party

R&D in cooperation with sales.

Statement

It was possible to increase the production volumes of disinfectant solutions with active ingredients that work through oxidation by 64% in the reporting period. It was even possible to increase the amount of products based on amines by 183%. This increase is significantly higher than the general percentage increase in the total number of biocidal products. The goal was therefore achieved.

6. Goal

Switch from non-recyclable composite packaging to recyclable mono-material packaging

Measures

Switch from composite packaging materials to single materials in collaboration with various customers.

Deadline

December 2024

Responsible party

Purchasing in cooperation with sales.

Statement

In the reporting year, many packaging materials made of composite materials were converted to films made of single materials and to films made with recyclates. The goal was therefore achieved.

Environmental goals for 2025 to 2027

The following environmental targets have been defined for 2025 and subsequent years:

1. Goal

Reduction in the energy consumption index by 3 % compared to 2024

Measures

Reduction of heating oil and diesel consumption through appropriate measures such as the installation of heat recovery systems, the installation of photovoltaic systems on available surfaces, the optimisation of routes and the increased use of public transport for business trips.

Deadline

December 2027

Responsible party

Management in cooperation with the sustainability & environment management and ConFM.

2. Goal

Optimisation of rigid packaging from a sustainability point of view

Measures

Reducing the amount of material used in bottles and canisters with the aim of saving at least four tonnes of plastic material (based on the number of units of the containers concerned from 2024) at the Malsfeld site.

Deadline

December 2026

Responsible party

Packaging development in collaboration with the sustainability and project management and R&D.

3. Goal

Implementation of software for the systematic and company-wide recording of the pieces of equipment requiring inspection and necessary preventive monitoring measures. This goal also serves to prevent occupational accidents.

Measures

Procurement of software and integration of the various pieces of equipment requiring inspection by the responsible persons with the aim of recording all pieces of equipment requiring inspection in the system. To this end, regular meetings will take place, which may also be combined with the ASA meetings.

Deadline

December 2025

Responsible party

Responsible persons for the pieces of equipment requiring inspection in consultation with the occupational safety specialist.

Declaration of validity – *see page 29*

Validation

ENVIRONMENTAL VERIFIER'S DECLARATION ON VERIFICATION AND VALIDATION ACTIVITIES

The
Environmental Verifier
Dipl.-Ing. Henning von Knobelsdorff
Mozartstraße 44
53115 Bonn

declares to have verified the consolidated environmental statement of the organization

Dr. Schumacher GmbH
Am Roggenfeld 3
34323 Malsfeld

registration number: DE-139-00093

NACE Code (20 & 21) „Chemicals and Manfacture of basic pharmaceutical products and pharmaceutical preparations“ meet all requirements of Regulation (EC) 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), as amended by Regulation (EU) 2017/1505 and Regulation (EU) 2018/2026, and declares this environmental statement valid.
By signing this declaration, I declare that:

— the verification and validation has been carried out in full compliance with the requirements of Regulation (EC) 1221/2009 in conjunction with Regulation (EU) 2017/1505 and Regulation (EU) 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 consolidated environmental statement of the organization with approximately 385 employees in the audited area reflect a reliable, credible and correct image of all the organisations activities, within the scope mentioned in the environmental statement.

- The next consolidated environmental statement will be provided to the Competent Body by February 15th 2028 latest.

This document is not equivalent to EMAS registration. EMAS registration can only be granted by a Competent Body under Regulation (EC) No 1221/2009. This document shall not be used as a stand-alone piece of public communication.

Signature is only provided on the original version in German language.

27 January 2025

Henning von Knobelsdorff
Environmental Verifier
DE-V-0090

Environmental Verifier Dipl.-Ing. Henning von Knobelsdorff
Certification of Management Systems

Gültigkeitserklärung

Erklärung des Umweltgutachters zu den Begutachtungs- und Validierungstätigkeiten

Der
Umweltgutachter
Dipl.-Ing. Henning von Knobelsdorff
Mozartstraße 44
53115 Bonn

hat das Umweltmanagement-System, die konsolidierte Umwelterklärung der

Dr. Schumacher GmbH
Am Roggenfeld 3
34323 Malsfeld
Registriernummer: DE-139-00093

NACE Code (20 & 21) „Chemie und Herstellung von pharmazeutischen Erzeugnissen“ auf Übereinstimmung mit der Verordnung (EG) 1221/2009 des Europäischen Parlaments und des Rates vom 25. November 2009 über die freiwillige Beteiligung von Organisationen an einem Gemeinschaftssystem für das Umweltmanagement und die Umweltbetriebsprüfung mit den Ergänzungen VO (EU) 2017/1505 und VO (EU) 2018/2026 geprüft und die vorliegende Umwelterklärung für gültig erklärt.

Mit der Unterzeichnung dieser Erklärung wird bestätigt, dass

— die Begutachtung und Validierung in voller Übereinstimmung mit den Anforderungen der Verordnung (EG) 1221/2009 i.V.m. VO (EU) 2017/1505 und VO (EU) 2018/2026 durchgeführt wurden,

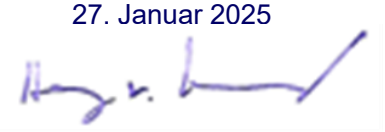
— keine Belege für die Nichteinhaltung der geltenden Umweltvorschriften vorliegen,

— die Daten und Angaben der aktualisierten Umwelterklärung des o.b. Standortes mit ca. 385 Mitarbeitern im begutachteten Bereich, ein verlässliches, glaubhaftes und wahrheitsgetreues Bild sämtlicher Tätigkeiten des Standortes innerhalb des in der Umwelterklärung angegebenen Bereiches geben.

Die nächste konsolidierte Umwelterklärung wird der Registrierstelle spätestens bis 15. Februar 2028 vorgelegt.

Diese Erklärung kann nicht mit einer EMAS-Registrierung gleichgesetzt werden. Die EMAS-Registrierung kann nur durch eine zuständige Stelle gemäß der Verordnung (EG) Nr. 1221/2009 erfolgen. Diese Erklärung darf nicht als eigenständige Grundlage für die Unterrichtung der Öffentlichkeit verwendet werden.

27. Januar 2025



Henning von Knobelsdorff
Umweltgutachter
DE-V-0090

Contact

Dr. Schumacher GmbH
Am Roggenfeld 3
34323 Malsfeld
Germany
P +49 5664 9496-0
F +49 5664 8444
info@schumacher-online.com
www.schumacher-online.com