ACTION PLAN FOR CO2 REDUCTION

Kamer van Koophandel®

Colophon

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1. Introduction

Whether big or small, every choice organisations make has an impact on the world around us. This also applies to the Netherlands Chamber of Commerce KVK. As a government organisation, it is our job to ensure that our influence is as positive as possible. So, within our own sphere of influence, we are working towards climate-neutral business operations in 2030. This is in line with government-wide targets in the Netherlands.

To achieve this, we set clear goals and take concrete steps. For example, we are reducing our CO_2 emissions using the CO_2 Performance Ladder. This system helps organisations to reduce their CO_2 footprint. The CO_2 Performance Ladder has 5 levels. The first 3 focus on the organisation's own emissions. Levels 4 and 5 also include the emissions of suppliers and customers. In 2025, KVK obtained the CO_2 Performance Ladder certificate at level 3.

In this action plan, we set out the measures we are taking to reduce our emissions. We use a management cycle to do this. This means that we always follow the same steps: we measure our emissions, set targets, implement measures, and check whether they are working. We then adjust our plan as necessary. In 2027, KVK will draw up a new action plan.

2 CO_2 reduction target

The Netherlands aims to be climate-neutral by 2050. The national government is setting an example by aiming to be climate-neutral itself by 2030. That is why KVK also aims to be a climate-neutral organisation by 2030.

This means that in 2026, we want to emit at least 25% less CO_2 than in 2023. From 2024 onwards, we will take the following steps each year to achieve this:

- **2024:** 2% less CO_2 emissions than in 2023
- **2025:** 15% less CO_2 emissions than in 2023
- **2026:** 25% less CO_2 emissions than in 2023

In 2024, we drew up a Strategic Housing Plan. In it, we outlined the future of our locations, with plans for renovations, relocations, and closures. In that year, we focused on preparation. This means that at many locations, we were not yet able to take concrete measures that would lead to CO_2 reduction in the same year. We investigated ways in which we could reduce emissions at our (future) locations. So, in 2024, we laid the foundations for greater impact from 2025 onwards. Examples include selecting locations that use only green electricity from the Netherlands and choosing buildings with at least energy label A.

To achieve the main objective, we are also focusing on the following sub-objectives:

- **Natural gas consumption and fuels (scope 1):** 15% reduction in CO_2 emissions in 2026 compared to 2023.
- **Purchased electricity (scope 2):** 48% reduction in CO_2 emissions in 2026 compared to 2023.
- **Business travel:** 5% reduction in CO_2 emissions in 2026 compared to 2023.
- **Green electricity:** In 2026, at least 10 KVK locations will be using green electricity

The targets for purchased energy (Scope 2) and green electricity have been made more ambitious in 2026. We did this because the previously set targets had already been achieved in 2025. The original target for purchased energy (Scope 2) was to reduce CO_2 emissions by 15% in 2026. However, by the end of 2025 we had already achieved a reduction of approximately 44%. In addition, by the end of 2025, 7 sites were already using green electricity from the Netherlands, which is why this target has also been set at a more ambitious level.

Climate-neutral business operations

The government wants to become a climate-neutral and circular organisation. Climate neutral means that our activities must not have a negative impact on the climate. The approach starts with saving and reducing waste. We then want to switch to renewable energy sources and materials as much as possible. As a last resort, we can offset emissions and pollution. But the aim is to avoid this as much as possible so that genuine sustainability takes place in our business operations.

3. Measures

Table 1. Measures for locations

	Measure	Details	Implementation	Who is responsible	Status	Projected CO_2 reduction on total footprint
1	Insight into consumption when searching for new locations	In all searches for new KVK locations, we take into account the wish to gain insight into energy consumption.	March 2024	Facilities, Housing & Procurement (FHI)	**Realised** The wish to be informed of actual consumption is included in the new location searches.	Measure provides insight, but no direct CO_2 reduction
2	Energy label A requirement for new location searches	All new site searches must always meet the requirement of having at least energy label A.	March 2024	Facilities, Housing & Procurement (FHI)	**Realised** All new locations have at least energy label A.	The reduction will be visible once all the new sites are operational.
3	Purchasing energy-efficient IT equipment	When buying IT equipment, such as laptops, desktop computers, and monitors, only products with the EPEAT silver or gold label are eligible. This quality mark indicates that a product meets sustainability and environmental requirements, with gold being the highest rating.	March 2024	IT	**Realised** All newly purchased IT equipment meets at least the EPEAT Silver standard. This requirement has been incorporated into the procurement process.	**-0.1%**
4	Sustainable printing at KVK locations	To reduce printing by employees – and so reduce the impact on energy consumption – we are placing 20% fewer printers at various KVK locations.	July 2024	IT	**Realised** The number of printers installed has been reduced by 20%, and the existing printers have been replaced with more energy-efficient models.	**-0.2%**
5	Green electricity from the Netherlands at KVK locations	KVK will consult with landlords and/or property owners to explore the possibility of switching to green electricity from the Netherlands for locations that do not yet use it.	December 2026	Facilities, Housing & Procurement (FHI)	**In progress** In 2025, 5 locations switched to using green energy from the Netherlands. This means a total of 7 locations are now using green energy. Eindhoven and Utrecht 300 will also switch in 2026. We are still in discussions with the landlords at the other locations.	If all 17 sites switch to green electricity from the Netherlands: **-63.8%**

	Measure	Details	Implementation	Who is responsible	Status	Projected CO_2 reduction on total footprint
6	Sustainability plans for KVK locations	Sustainability is structurally placed on the agenda during periodic consultations with landlords and property owners. This allows us to check whether they already have sustainability plans in place or to jointly investigate what is possible in the short term	January 2025	Facilities, Housing & Procurement (FHI)	**Realised** Since January 2025, sustainability is a regular item on the agenda at periodic meetings with landlords and property owners.	Measure provides insight, but no direct CO_2 reduction
7	Reduce standby consumption of water coolers at all KVK locations	Research was carried out at the KVK location in Rotterdam, into the standby consumption of electrical appliances. This showed that water coolers consume energy unnecessarily, even when they are not actively used. Based on this insight, it was decided to set the water coolers to standby mode as standard at all KVK locations – 57 water coolers in total. This significantly reduces standby consumption. In this mode, the water coolers consume 75% less power.	April 2025	Facilities, Housing & Procurement (FHI)	**Realised** Water coolers at all KVK locations are now set in standby mode as standard.	**-11.84%**
8	LED lighting KVK location Rotterdam	At the KVK location in Rotterdam, the existing lighting will be replaced with energy-efficient LED lighting where possible. This measure follows a process in 2024, in which it was investigated who is responsible for the modification: KVK or the landlord. In this case, it appears that the responsibility is shared. We are currently awaiting a quotation as a tenant.	To be deter-mined after receiving the quotation.	Facilities, Housing & Procurement (FHI)	**In progress** The landlord has started a quotation process, and KVK is waiting to see an offer. We have already removed some decorative lighting, as it was previously installed by KVK.	**-1.43%**
9	LED lighting for stair-wells and technical rooms at the Utrecht 300 head office	At the Utrecht 300 head office, we are replacing the lighting in the stairwells and technical rooms with LED lighting. This measure is in line with the 2024 process, which investigated who is responsible for implementation: KVK or the landlord. In this case, KVK itself initiated a tendering process to be able to enter discussions with the landlord.	June 2026	Facilities, Housing & Procurement (FHI)	**In progress** We are currently replacing the LED lighting in the stairwells and the technical rooms.	**-0.03%**
10	Solar panels at head office Utrecht 300	Solar panels are being installed at the Utrecht 300 head office by the owner of the building.	Information not yet received from the owner.	Facilities, Housing & Procurement (FHI)	**In progress** The property owner is currently preparing for the installation of the solar panels.	**-0.60%**

	Measure	Details	Implementation	Who is responsible	Status	Projected CO_2 reduction on total footprint
11	Workplace strategy for head office in Utrecht 300 and Utrecht 6-8	For the KVK locations Utrecht 300 and Utrecht 6-8, KVK is developing a workplace strategy to use both buildings effectively and efficiently. This will contribute to lower energy consumption. The definitive plan will be made in 2025. implementation will start in 2026.	December 2026	Facilities, Housing & Procurement (FHI)	**In progress** The workplace strategy has now been approved and will be implemented in 2 phases. The first phase has begun and focuses on reallocation and redesign. In the second phase we will make a definitive workplace strategy for the head office that will remain in place in the future.	First visible results are expected from 2026/2027.
12	Control systems	We check the control systems at every KVK location. These are the systems that automatically regulate installations such as heating, ventilation, and cooling. Where possible, we adjust the settings so that the installations operate more efficiently and economically.	April 2026	Facilities, Housing & Procurement (FHI)	**In progress** We have contacted all locations, asking them to provide details of the control systems in place.	Measure provides insight, but no direct CO_2 reduction yet.
13	Switching off unused monitors at Utrecht 300	At our head office at Utrecht 300, we unplug all computer monitors that are not in use. This ensures that no unnecessary electricity is used.	May 2026	Facilities, Housing & Procurement (FHI)	**Realised** At Utrecht 300, all computer monitors that are not in use have been unplugged. We are looking into whether we can roll out this approach across all KVK locations.	**-0.01%**
14	Insight into energy consumption via submeters in Utrecht 300	KVK is investigating whether it is possible to gain access to the sub-meters at Utrecht 300, so that we can monitor energy consumption more effectively. We are also looking into whether energy consumption can be allocated more specif-ically to our office, rather than using the current estimate.	April 2026	Facilities, Housing & Procurement (FHI)	**Realised** From now on, the property manager will share KVK's specific consumption figures with us, rather than the building's total consumption.	Measure provides insight, but no direct CO_2 reduction
15	New energy audits for Utrecht 300 and Rotterdam	KVK will carry out new energy audits for Utrecht 300 and possibly also for Rotterdam. These audits will identify potential energy-saving measures and enable an investigation into which systems or appliances consume an unnecessarily high amount of energy.	May 2026	Facilities, Housing & Procurement (FHI)	**In progress** We have requested a quotation from a provider.	Measure provides insight, but no direct CO_2 reduction yet.

Table 2. Measures for business travel

Measure		Details	Implementation	Department	Status	Projected CO_2 reduction on total footprint
1	Sustainable transportation policy	We are drafting a new KVK transportation policy, based on the principle that employees should commute to the office by public transportation, bicycle, or on foot as much as possible.	July 2024	Human Resource Management (HRM)	**Realised** The new transportation policy took effect on 16 July.	**-1.26%**
2	Analysis of business travel with private vehicles	KVK is analysing why the number of business trips using private vehicles has increased compared to 2023. This enables us to take appropriate action.	April 2025	Human Resource Management (HRM)	**Realised** We have improved our expense reporting system to ensure that business trips are recorded accurately. This makes it possible to conduct a more reliable analysis, providing better insight into the nature and scale of business travel using private vehicles.	Measure provides insight, but no direct CO_2 reduction yet.
3	Shuttel campaign	KVK is launching an internal campaign to determine which public transport trips are made by KVK employees for commuting and which are for business purposes. The aim is to encourage KVK employees to indicate in the Shuttel mobility app whether their trip is for commuting or business purposes. With this insight, we can take targeted measures to reduce CO_2 emissions and make mobility more sustainable. This measure follows a 2024 measure that already asked employees to indicate whether their public transport travel was for commuting or business purposes. So far, about 20% of employees have done so.	June 2025	Human Resource Management (HRM)	**Rejected** After careful consideration, it was decided not to implement this measure as the expected results would be limited. We discussed with Shuttel whether there were opportunities to better understand the distinction between business travel and commuting. However, these possibilities turned out to be limited. It was therefore decided that from 2026, the difference between commuting and business travel would be measured by looking at the KVK employee's work location. On this basis, a percentage distribution will be used.	None

	Measure	Details	Implementation	Department	Status	Projected CO_2 reduction on total footprint
4	Reduction in number of lease cars	Around October 2025, KVK will switch to a new lease car supplier for a smaller fleet. Following a user analysis, it was decided to reduce the number of lease cars.	November 2025	Facilities, Housing & Procurement (FHI)	**Realised** The tender process for lease cars has been completed, and the new contract came into effect on 1 November 2025. KVK now uses only electric lease cars (previously these were hybrid cars). The number of cars will be gradually reduced over the coming years as lease contracts expire (the first in April 2026, the last at the end of 2027). The final number of lease vehicles has not yet been determined.	**-2.7%**
5	Sell company cars	KVK is selling its 2 company cars due to legislation and regulations (zero-emission zones) and the high maintenance costs.	December 2025	Facilities, Housing & Procurement (FHI)	**Realised** We no longer own any company cars.	**-0.01%**
6	Zero-emission chauffeur services	From 2026, there will be a new government-wide tender for chauffeur services, with a focus on zero-emission vehicles.	March 2026	Facilities, Housing & Procurement (FHI)	**Realised** From March 2026, KVK has a new contract for chauffeur services. Since the contract came into effect, we have been using zero-emission vehicles for at least 15% of the kilometres travelled. This percentage will increase each year in line with a set roadmap leading up to 2030. As a result, we will be operating entirely emission-free chauffeur services by 1 January 2030 at the latest.	**-0.01%**
7	Analysis of air travel	KVK is investigating why the number of air journeys in 2025 has increased compared with 2023 and 2024. We are also examining the provisions relating to air travel in the new Central Government Collective Labour Agreement (CAO Rijk) and how we can implement them.	July 2026	Facilities, Housing & Procurement (FHI) Human Resource Management (HRM)	**In progress** We are taking further steps to gain a clearer picture of both the increase in air travel and the implementation of the new CAO Rijk within KVK.	Measure provides insight, but no direct CO_2 reduction.

4. Steering cycle

At KVK, we are always working to improve our performance on CO_2 reduction. To do this, we use the PDCA cycle. PDCA stands for ‘Plan, Do, Check, Act’ and is a method to drive continuous improvement. Plans are made, implemented, checked, and adjusted. The cycle is then repeated to continuously improve and ensure the quality of processes. Table 3 shows an overview of the different phases and associated activities. The CSR project manager is responsible for going through this cycle periodically and keeping all associated documents up to date.

Table 3. PDCA-cycle

Activity
Plan
Determine which organisational units contribute to CO_2 emissions and establish the organisation’s size
Identify legal obligations
Identify key personnel responsible for CO_2 policy within the organisation
Establish a framework for collecting and verifying data
Map CO_2 emissions and energy consumption
Analyse energy consumption
Set targets
Select which measures to implement
Draw up a communication plan
Identify the knowledge and collaboration required
Do
Collect data
Implement reduction measures
Carry out communication activities
Check
Measure and track progress
Compare results with targets
Carry out internal and external audits
Act
Have progress and results assessed by the Board of Directors
Update targets and measures (if necessary)
Continuous improvement

4.1 Process owners

KVK must submit a number of documents for the CO_2 Performance Ladder. Table 4 describes these documents, including who is responsible for producing them and when they must be updated. The CSR project leader is responsible for collecting the documents and monitoring the effects of the measures taken.

The reduction measures are implemented across various departments within KVK, as outlined in Chapter 3: Measures. The CSR project leader regularly consults with both the departments and the relevant managers on the progress of the measures. In doing so, the CSR project leader contributes ideas, where necessary, on possible improvements or alternative approaches to reducing CO_2 emissions.

Table 4. Overview of process owners per document

General		Content	Process owner	Update due	Month
Algemeen					
1	Boundaries of the organisation (Requirement 4)	Determine which parts of the organisation are included in the CO_2 emissions calculations and what the size of the organisation is.	CSR project manager	Year	January
2	Identification of key personnel (Requirement 7.2)	Identify key staff members for CO_2 policy and ensure they have sufficient knowledge of CO_2 and sustainability.	CSR project manager	Year	January
3	Data quality management plan (Requirement 9.1.2)	Plan for the collection, reporting, and improvement of energy and emissions data.	CSR project manager	Year	January
4	Emissions inventory for the base year (Requirement 9.1.4)	Determining and adjusting a base year to enable accurate comparisons between energy and emissions data.	HRM adviser, Facilities coordinators, Facilities Service Desk staff member	Year	February
5	Internal audit (Requirement 9.2)	Checking whether the CO_2 policy is working effectively and identifying opportunities for improvement.	CSR project manager | carried out by Stichting Stimular	Year	July
6	Management review (Requirement 9.3)	Review by the Board of Directors of the CO_2 policy (results and progress) and potential improvements.	CSR project manager | reviewed and approved by the Board of Directors	Year	August
7	External audit (Requirement 9.4)	Conducting the annual audit in accordance with the certification scheme.	CSR project manager | carried out by: DEKRA	Year	November

General		Content	Process owner	Update due	Month
Approach A - Insight					
A1	Energy assessment and energy balance (Requirement 1.A.1-1)	Analysis of current and historical energy consumption, inventory of energy consumers, progress, and possible reduction measures.	CSR project manager	Year	April
A2	Emissions inventory and CO_2 footprint (Requirement 1.A.2-1)	An emissions inventory and carbon footprint provide insight into how much CO_2 KVK emits. We look at direct emissions, such as natural gas consumption and fuels (Scope 1), emissions from purchased energy, such as electricity (Scope 2), and emissions from business travel.	HRM adviser, Facilities coordinators, Facilities Service Desk staff member	Year	March
Approach B - Reduction					
B1	Action plan CO_2 reduction (Requirement 1.B.1-3)	A plan setting out measures to achieve the CO_2 targets, including how we measure, monitor, and improve progress, with an explanation of the list of measures and a comparison with the sector.	CSR project manager	Year	June
B2	Progress report (Requirement 1.B.2-1)	A description of the results achieved, the progress made, and whether the targets are being met.	CSR project manager	6 months	May and October
Approach C - Communication					
C1	Communications plan (Requirement 1.C.2-1)	Overview of key stakeholders, communication objectives, planning, and communication channels.	Communication advisers	Year	March
Approach D - Collaboration					
D1	Analysis of knowledge and collaboration needs (Requirement 1.D.1)	Analysis of the knowledge and collaboration needed for the action plan (document B1).	CSR project manager	Year	January
D2	Inventory of knowledge and collaboration needs (Requirement 1.D.2)	An overview of potential collaborations and partners to organise the necessary expertise and cooperation.	CSR project manager	Year	February

5. Position within the sector

5.1 Sector comparison

In addition to the action plan, KVK's planned and proposed measures and its CO_2 intensity have been compared with those of other (semi-) public service providers with comparable CO_2 emissions and similar characteristics in terms of office use and business travel.

The measures set out in the CO_2 Performance Ladder's list of measures are categorised into standard measures (A), progressive measures (B), and ambitious measures (C). KVK has 7 standard measures, 5 progressive measures, and 1 ambitious measure. This demonstrates a broad foundation, supplemented by measures that go beyond the basics and are aimed at further CO_2 reduction. The ambitious measure indicates that, while limited, there is a focus on innovation and further sustainability efforts. Measures not included in the standard list have been added as supplementary items and are not subdivided into these categories.

When comparing sector organisations, it is striking that some organisations are strongly committed to specific themes, such as the electrification of vehicle fleets, whilst others opt for a broader, integrated approach. KVK falls somewhere in between, with a structured CO_2 Performance Ladder approach that tackles multiple sources of emissions but still shows only limited leadership in terms of innovative measures.

The CO_2 intensity stands at 0.66 tonnes of CO_2 per FTE and per euro of turnover. This places KVK in the middle of the pack: our emissions are lower than those of organisations with a larger carbon footprint, but higher than those of frontrunners in sustainability. As fully comparable sector data is lacking, this comparison provides only an estimate of KVK's position within the sector.

5.2 Summary

Based on a comparison of measures and CO_2 intensity, KVK is a mid-table performer within the sector of (semi-) public service providers. KVK adopts a structured approach via the CO_2 Performance Ladder and has standard, progressive, and ambitious measures in place. We regard this as a mature baseline with scope for further development towards more innovative and sector-leading measures.

CO_2 intensity is at an average level within the sector, meaning there is no clear position as either a frontrunner or weak performer. Compared with sector peers, it is striking that other organisations either place greater emphasis on rapid reduction targets or adopt a broader, integrated approach to sustainability. KVK occupies a middle ground in this respect and can therefore also be seen as a mid-table performer.

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