European Commission

Joint Research Centre

Revision of the EU Ecolabel criteria for Tourist Accommodation

Draft Technical Report v1.0

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2025

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JRC143556

Luxembourg: Publications Office of the European Union

How to cite this report: Zahara Pérez Arribas, Shane Donatello and Renata Guimarães. *Revision of the EU Ecolabel criteria for Tourist Accommodation Draft Technical Report v1.0*, Publications Office of the European Union, Luxembourg, JRC143556.

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Abstract

This draft Science for Policy Report is intended to provide the background information for the revision of the existing EU Ecolabel criteria for Tourist accommodation (Commission Decision 2017/175/EU).

The study has been carried out by the Joint Research Centre (JRC) Unit B.5 Circular Economy and Sustainable Industry with the technical support of Viegand Maagøe A/S. The work is being developed for the European Commission´s Directorate-General for Environment.

The EU Ecolabel criteria for Tourist accommodation set out in Decision 2017/175/EU were established in 2017. Commission Decision (EU) 2024/3179 prolonged their validity until 31 December 2027.

The main purpose of this first version of the technical report is to summarise the results of the preliminary analysis of the current criteria, to evaluate if any revision of the product groups scope is needed, and to discuss if the criteria are still appropriate and up-to-date, or if some of them should be revised, amended or removed; and finally, if any new criteria should be added. Proposals to expand the scope of the EU Ecolabel criteria to different types of tourist accommodations are presented on an initial basis. Regardless of potential changes to the scope, a restructuring of the criteria is also presented for stakeholders to consider, with the main idea to allow a clear distinction between accommodations.

This Technical Report addresses the requirements of Regulation (EC) No 66/2010 (EC, 2010) for technical evidence to inform about the criteria revision, and sets the scene for the 1st Ad-Hoc Working Group (AHWG) meeting, scheduled for the 22 January 2026, and the following stakeholder consultation. This technical report is supported and complemented by the Preliminary Report, which is published in parallel with this Technical Report.

In this first version of the Technical Report, which should be considered as a working document that will evolve into later versions during the project, the current EU Ecolabel criteria have been revised to a minor degree based on stakeholder inputs received to date and known issues with the existing criteria that were flagged for needed improvement. With each theme in this report, rationale is provided to explain why the criteria changes (if any) were proposed and what is the potential implication of the new proposal. A direct comparison to any equivalent criteria in currently valid versions of ecolabel criteria sets is also provided. If considered relevant, the relevance of specific criteria to life cycle impacts of tourist accommodations is also mentioned in the rationale.

This technical report consists of the following key sections: Summary of the Preliminary Report (section 2), scope and definition (section 3), an annex preamble on assessment and verification (section 4) and new criteria proposals (section 5).

In this last section the rationale for each of the proposed criterion texts and assessment and verification texts are presented.

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Executive summary

Tourism is a major pillar of the European economy, but tourist accommodation services are under increasing pressure to reduce their environmental footprint, respond to climate and resource constraints, and demonstrate credible sustainability performance. The EU Ecolabel for Tourist Accommodation Services is a voluntary policy instrument designed to support this transition. However, the current criteria, adopted in 2017, no longer fully reflect market developments, technological progress, evolving environmental priorities, or the diversity of accommodation types now operating in the sector. This first Technical Report (TR1) provides the technical basis for revising the EU Ecolabel criteria for tourist accommodation and supports the forthcoming stakeholder consultation and policy decision-making process.

TR1 brings together evidence from a preliminary stakeholder questionnaire, a review of the legal and policy framework, a market analysis, and an assessment of environmental impacts across the life cycle of tourist accommodation services. On this basis, TR1 evaluates the continued relevance of the existing criteria, identifies areas where revision or restructuring is justified, and presents an initial set of revised criteria proposals for stakeholder discussion.

A central objective of this work is to ensure that the revised EU Ecolabel criteria remain ambitious and environmentally robust, while also being proportionate, implementable and relevant for a wide range of accommodation types, including hotels, campsites and other forms of short-stay accommodation. Particular attention is paid to reducing unnecessary administrative burden, improving clarity in assessment and verification, and strengthening the link between criteria requirements and the most significant environmental impact "hotspots" of the sector.

Policy context

This report supports the implementation of Regulation (EC) No 66/2010 on the EU Ecolabel and contributes to the ongoing revision of the EU Ecolabel criteria for Tourist Accommodation Services. It is prepared by the Joint Research Centre for the European Commission's Directorate-General for Environment, with technical support from external experts, and forms part of the formal EU Ecolabel criteria development and revision process.

The work is highly relevant in the context of the European Green Deal, the EU's climate neutrality objective for 2050, and the broader shift towards more sustainable production and consumption patterns. It also aligns with recent and forthcoming policy initiatives such as the Directive on empowering consumers for the green transition, the proposed Green Claims Directive, and the Ecodesign for Sustainable Products Regulation, all of which recognise the importance of credible, third-party verified environmental performance information. Within this evolving policy landscape, the EU Ecolabel plays a key role as a trusted instrument to distinguish products and services with high environmental performance and to reduce the risk of greenwashing.

The report is particularly timely given the prolonged validity of the current EU Ecolabel criteria for tourist accommodation until the end of 2027 and the rapid evolution of the sector since their adoption. Changes in accommodation business models, the growth of short-term rentals and glamping, increasing energy and water pressures, and new expectations regarding climate performance all underline the need for an updated and future-proof criteria set.

Main findings

The analysis confirms that energy use, water consumption and waste generation remain the dominant contributors to the environmental impacts of tourist accommodation services across their

life cycle. Screening LCA results and a review of the Product Environmental Footprint Category Rules (PEFCR) for hotels show that climate change and fossil resource use are the most significant impact categories, with electricity use, space and water heating, and laundry services emerging as key drivers during the use phase.

Stakeholder feedback and data collected from existing EU Ecolabel licence holders highlight large variability in performance across accommodation types and sizes, as well as persistent challenges in the consistency and comparability of reported consumption data. This underlines the importance of clearer definitions, improved consumption monitoring requirements and better alignment of metrics with policy and market needs.

The review of the existing criteria indicates that many remain broadly relevant, but that targeted revisions and restructuring are needed. Key issues include outdated references, insufficient differentiation between accommodation types, and requirements that may impose disproportionate administrative burdens on small and micro enterprises without delivering commensurate environmental benefits. At the same time, the analysis identifies opportunities to strengthen criteria related to energy management, building systems control, water efficiency, waste prevention, and environmental management practices, drawing on best practices observed in other ecolabel schemes and recent technological developments.

On this basis, TR1 proposes a restructured criteria framework organised around thematic areas, with clearer rationales and assessment and verification approaches. The proposed revisions aim to improve environmental effectiveness, enhance clarity and usability for applicants and competent bodies, and ensure coherence with other EU sustainability policies. These proposals are presented as a starting point for discussion and will be further refined through stakeholder consultation and subsequent technical work.

Introduction

Tourism is a major pillar of the European economy, but accommodation services face increasing expectations to reduce environmental impacts, respond to climate risks, and demonstrate credible sustainability performance. The EU Ecolabel (EUEL) for Tourist Accommodation Services (TAS) is a voluntary tool intended to support this transition. However, the current criteria (last revised in 2017) face declining relevance, uneven applicability across accommodation types, and increasing administrative burdens for operators, especially micro and small enterprises.

The EU Ecolabel ([1]) is the official voluntary labelling scheme of the EU that promotes the production and consumption of products (goods and services) with a reduced environmental impact over their life cycle, and is aimed at products with a high level of environmental performance. Established in 1992, it has become a key policy instrument within the European Commission's Sustainable Consumption and Production and Sustainable Industrial Policy (SCP/SIP) Action Plan ([2]) and the Roadmap for a Resource-Efficient Europe ([3]). The Roadmap was designed to move the economy of Europe onto a more resource-efficient path by 2020, in order to become more competitive and to create growth and employment.

The EU Ecolabel also has links with other policy instruments, such as Green Public Procurement ([4]), the Eco-Management and Audit Scheme (EMAS) ([5]) and the Ecodesign Directive ([6]).

The EU Ecolabel was mentioned as having an important role in the new Circular Economy Action Plan (CEAP) from March 2020 ([7]).

The EU Ecolabel was also mentioned in the Chapeau Communication on making sustainable products the norm. This Communication accompanies a package of measures proposed in the CEAP and adopted on 30 March 2022, including the subsequently adopted Ecodesign for Sustainable Products Regulation ([8]). an EU strategy for sustainable and circular textiles, a proposal for a revised

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1 Regulation (EC) No 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel (OJ L 27, 30.1.2010, p.1-19). Available at this link.

2 The Sustainable Consumption and Production and Sustainable Industrial Policy Action Plan. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. COM(2008)397. Available at this link.

3 Roadmap to a Resource Efficient Europe. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. COM(2011)571. Available at this link.

4 Public procurement for a better environment. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. COM(2008)400. Available at this link.

5 Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS), repealing Regulation (EC) No 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC (OJ L, 342, 22.12.2009, p.1-45). Available at this link.

6 Directive 2009/125/EC of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for energy-related products (OJ L 285, 31.10.2009, p.10-35). Available at this link.

7 The Circular Economy Action Plan. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. A new Circular Economy Action Plan For a cleaner and more competitive Europe. COM(2020) 98 final. Available at this link.

8 Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products (OJ L 2024/1781, 28.6.2024). Available at this link.

Construction Products Regulation, and a proposal for empowering consumers in the green transition. The Communication mentions the EU Ecolabel as an important tool whose criteria will be developed in synergy with future Ecodesign measures.

This first draft Technical Report (hereafter TR1) addresses the requirements of EU Ecolabel Regulation 66/2010 and its main purpose is to summarise the results of the preliminary analysis of the current criteria and to consider if the criteria are still appropriate and up-to-date or if they should be restructured, revised, amended or some of them removed; and finally, if any new criteria should be added. This TR1 provides elements supporting the revised EU Ecolabel criteria for tourist accommodation.

The revision process takes the legal criteria text[9] as the starting point and seeks to analyse its validity, taking into account technological and economic changes in the European market, relevant legislative changes, improved scientific knowledge and feedback from Competent Bodies and license holders.

This TR1 is supported and complemented by the draft Preliminary Report published in parallel in December 2025, ahead of the 1st Ad-Hoc Working Group (AHWG1) meeting scheduled for January 2026. The Preliminary Report includes analyses of the scope and definition, market analysis, and technical analysis, with a particular focus on specific consumption metrics and life cycle impacts. In the Preliminary Report, the results of a life cycle assessment (LCA) for hotels were presented for the identification of environmental hotspots.

Bringing together the information in the associated Preliminary Report on the assessment of the current scope and criteria validity, on the market analysis and on the life cycle assessment (LCA) studies, as well as the preliminary feedback from stakeholders, a first proposal for a set of revised EU Ecolabel criteria is presented in this Technical Report. The entire life cycle of the products is considered, from the extraction of raw material through production, transport and use, to the disposal phase. The EU Ecolabel criteria address the environmental impacts from any of these life cycle phases, with the aim being to encompass the areas of greatest impact (life cycle hot spots).

An important part of the process for developing or revising EU Ecolabel criteria is the involvement of stakeholders through their consultation on draft criteria proposals and technical reports. This is carried out via Ad-Hoc Working Group (AHWG) meetings, conference calls, email exchanges, forum discussions and written comments submitted via the online platform BATIS. The criteria revision process involves contributions from technical experts, non-governmental organisations (NGOs), Member State representatives and industry stakeholders, among others.

This TR1 is structured as follows:

- Introduction (Chapter 1): this section describes the goal of the project and the structure of the document.
- Summary of the Preliminary Report (Chapter 2): this section summarises the main findings from the Preliminary Report, especially with respect to market analysis and technical analysis, including an overview of the results of the LCA screening studies.

[9] Commission Decision (EU) 2017/175 of 25 January 2017 on establishing EU Ecolabel criteria for tourist accommodation https://eur-lex.europa.eu/eli/dec/2017/175/oj/eng

- Scope, definitions and criteria structure (Chapter 3): this section reports changes to the scope, definitions and criteria structure related to the product group of 'tourist accommodation'.
- Annex Preamble (Chapter 4): this section includes general information on the type of proof required to show compliance with the criteria that shall be provided by applicants and approved by Competent Bodies.
- Annex I (Chapter 5): criteria for **"**Tourist accommodation in large hotels, holiday and other short-term rentals**"**.
- Annex II (Chapter 6): criteria for **"**Tourist accommodation in small and medium hotels, holiday and other short-term rentals**"**.
- Annex III (Chapter 7): criteria for **"**Campsite and/or caravan park accommodation**"**.

The sections in chapters 5 to 7 present the first proposals for revisions to the EU Ecolabel criteria as well as the technical rationale for the structure and content of the individual criteria. The changes are highlighted in blue text.

Relevant discussions and inputs that support the revised criteria proposals or changes to those proposals will be reflected in future versions of the draft Technical Report. For transparency, a table of all comments received during the public consultation periods, together with responses and explanations on how they have been addressed in the next rounds of criteria proposals, will be published as a separate document.

Summary of Preliminary Report

The summary here reflects the content of version 1.0 of the draft Preliminary Report (PR). Any significant changes to the content of the PR later on should also be reflected in this summary section of future versions of the Technical Reports, as relevant.

Task 1: Preliminary stakeholder questionnaire and responses

During June-July 2025, the JRC released a preliminary questionnaire on EU Survey with dozens of questions about the current EU Ecolabel criteria which were either mandatory or dependent on choices selected in response to mandatory questions. A total of 83 responses were received, with 54% of responses coming from industry; 17% from EU Ecolabel Competent Bodies (CBs); and the rest from NGOs, authorities, or consultants. A balanced geographical representation of EU Member States was achieved.

- Motivation for the EU Ecolabel: Strong environmental values, credibility of the EU Ecolabel (EUEL), and alignment with guest expectations were the main drivers for ecolabel adoption. Certification was seen as both a communication tool and a mechanism for continuous improvement.
- Experience with EUEL: Positive sentiment dominated (75%), citing improved internal practices, credibility, and customer trust. Challenges included complex criteria wording, heavy documentation demands, and burdens for SMEs. Preparing application documents was consistently identified as the most burdensome aspect.
- Competent Body insights: Most CBs reported experience with TAS applications. The main issues stemmed from outdated/difficult criteria and inconsistent verification. Improvement priorities were: simplify criteria, provide better templates and guidance, enhance visibility of the EUEL, and consider financial/technical support for SMEs.
- Areas for improvement: Nearly two-thirds of respondents prioritised simplification and clarity of criteria. Other recommendations included: improved translations, digital tools for applications, greater flexibility for SMEs, and tailoring criteria to local realities (e.g. renewable energy feasibility in Malta).
- Scope and definitions: Strong support for maintaining the combination of mandatory and optional criteria was expressed. A clear majority favoured the inclusion of short-term rentals (STRs), but with simplified or separate criteria. Opinions were divided on expanding the scope to restaurants, transport, or other services. There was support for introducing more social criteria (labour rights, accessibility and aspects relevant to Corporate Sustainability Reporting (CSR)).
- Criteria themes and revisions: Existing themes (energy, water, waste, general management) were considered to broadly cover the main impacts, but revisions are needed. Energy efficiency criteria (especially the mandatory ones) were ranked as most in need of revision. SMEs face disproportionate burdens across all themes due to documentation, monitoring, and verification demands.
- Specific criteria challenges: Mandatory energy criteria (6, 8, 10, 12) were seen as overly technical or impractical for SMEs. Optional criteria on ISO/EMAS certification were

considered too burdensome and unrealistic. Waste, water, and social policy criteria often lacked clarity or relevance across different types of accommodation.

Conclusions and next steps

The assessment highlighted broad support for the EU Ecolabel's objectives but signalled the need for:

- Simplification and clarity: plain language criteria, templates, and digital tools.
- SME-friendly approaches: scalable requirements, reduced paperwork, and proportional verification.
- Broader sustainability coverage: bring in stronger social criteria and a reconsideration of requirements relating to biodiversity, mobility, and food sourcing.
- Enhanced recognition and uptake: stronger promotion through booking platforms and EU green policy integration.
- Priority revision of energy criteria and in improving guidance and templates for all criteria.

These insights subsequently informed the further research into the scope and market assessment sections and provide some supporting rationale for changes in the criteria proposed in this report.

Task 2: top-down review of legal and policy context relating to the scope

Under task 2 of the Preliminary Report, tourist accommodation has been reviewed in the context of the following high-, mid- and low-level policies, regulation and standards in the EU:

- High-level: the UN Sustainable Development Goals (SDGs), the European Green Deal, the Fit-for-55 package and the EU Transition Pathway for Tourism.
- Mid-level: the Corporate Sustainability Reporting Directive (CSRD), the Circular Economy Action Plan (CEAP), the Water Resilience initiative, the Zero Pollution Action Plan (ZPAP), the Single-Use Plastics Directive (SUPD), the Packaging and Packaging Waste Regulation (PPWR), the Biodiversity Strategy, the Waste Framework Directive (WFD) and the EU Ecolabel Regulation.
- Mid-level (energy-related): Energy Performance of Buildings Directive (EPBD), Energy Efficiency Directive (EED), ISO 50001, the Ecodesign Directive, the Energy Labelling Regulation and the EU Ecolabel Regulation.
- Low-level: Specific Implementing Regulations under the Ecodesign Directive, Energy Labelling Regulation or Decisions under the EU Ecolabel for specific product groups and the Best Environmental Management Practice (BEMP) for the tourist sector.

The broad range of directly and indirectly related policies reflects both the multi-faceted nature of tourist accommodation services (e.g. electricity consumption, fuel consumption, water consuming devices, HVAC systems and diverse consumables) and the large number of criteria that have been set out already in the current EU Ecolabel.

Task 2: Bottom-up review of criteria and other ecolabels relating to the scope

Under task 2, a review of the 53 legislative references in Decision (EU) 2017/175 found that only 16 have not been amended (11 of 53) or repealed (26 of 53) since 2017. This is therefore an important area to pay attention to in the criteria proposals.

Several other ecolabels were identified for review and their scopes and criteria themes compared. The most relevant ecolabel schemes were: Nordic Swan, Austrian ecolabel, Green Key (GK), GreenSign (GS) and Green Globe (GG). The first two are, like the EU Ecolabel, examples of public authority-led ecolabel schemes that focus on not just tourist accommodation, but also many other product groups. The latter three are examples of ecolabel schemes that are independent organisations and that focus exclusively on the tourism sector. The influence of the Global Sustainable Tourism Council (GSTC) criteria was particularly notable in the ecolabels that were solely focused on the tourism sector. Although not an ecolabel itself, the GSTC also offers a formal recognition of ecolabel schemes that are sufficiently aligned with their own performance indicators.

A common approach amongst the ecolabel schemes was the combination of mandatory and optional requirements and the grouping of criteria into themes. The grouping of criteria into themes was also a common approach, although the definition of the themes differed. The most common themes can be stated as: Management; Energy; Water; Waste; Food and drink; Chemicals and cleaning; Consumables/procurement; Indoor air quality/pollution; Transport/mobility; Biodiversity/outdoors; Social.

Task 3: Market analysis

Under task 3, of the background research, market data from the World Travel and Tourism Council (WTTC), the United Nations World Tourism Organisation (UNWTO, now "UN Tourism"), and Eurostat data. The Eurostat data was reviewed in more detail at both EU27 and Member State level.

The Eurostat data is built upon the NACE Rev. 2.1 statistical categories. A detailed review of the relevant categories under NACE code 55 has helped to shape the new scope proposal and associated definitions mentioned later in this report. The market analysis considered the following three NACE codes:

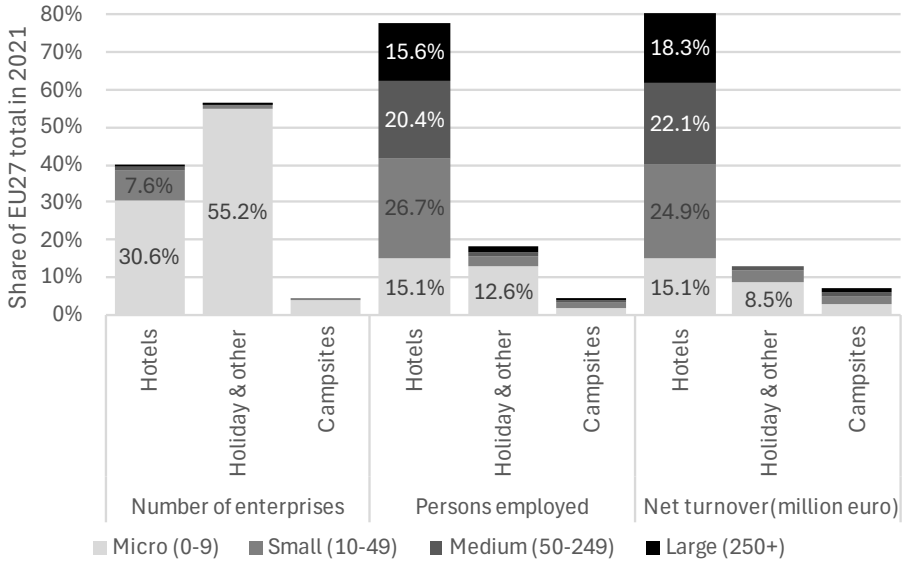
- 55.10: hotels and similar accommodation.
- 55.20: holiday and other short-stay accommodation.
- 55.30: camping grounds, recreational vehicle parks and trailer parks.

A snapshot of the Eurostat business statistics from 2021 at EU27 level confirms that the sector is dominated by micro-enterprises in terms of the number of enterprises (89.6% of all enterprises across the three categories, of which 55.2% were code 55.20). Of the remainder, 8.9% were small, 1.4% medium and just 0.1% large. Almost all of the medium and large enterprises were hotels (code 55.10).

A very different distribution emerges when looking at persons employed. Hotels (code 55.10) dominate the sector and the share of large enterprises is now 15.6% (despite being just 0.1% of the number of enterprises). This is a x156 change compared to the share in number of large enterprises. Looking at all medium enterprises in the three categories, the change is x15.7, for small enterprises it is x3.5, and for micro-enterprises it is x0.32. The distributions in terms of

turnover very closely matched those of persons employed. In simple terms, large hotel establishments have by far the highest concentrations of persons employed and turnover.

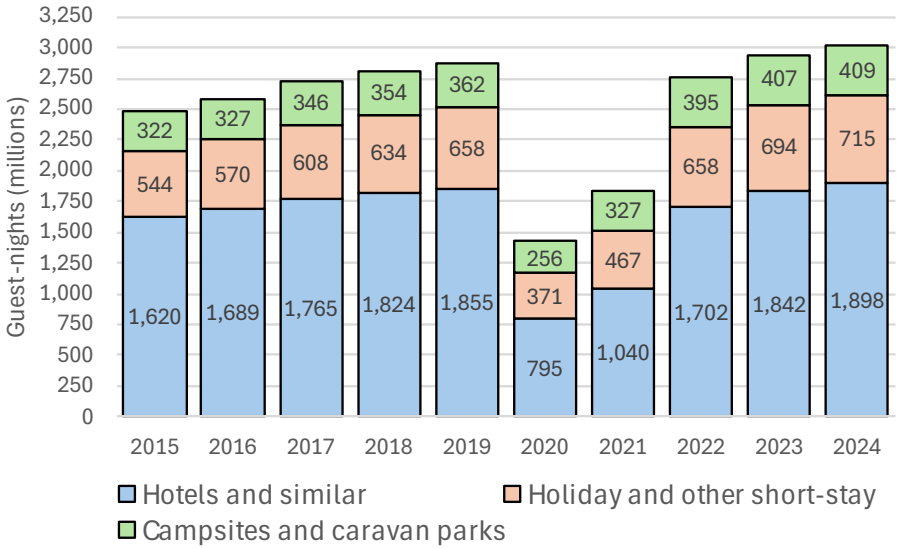
Figure 1. Contribution of micro, small, medium and large enterprises to the total number of enterprises, persons employed and net turnover in the three main tourist accommodation categories (each group of three columns sums to 100%)



Source: Eurostat business statistics (sbs_sc_ovw)

In terms of demand, expressed in units of guest-nights (which is one guest staying for one night in tourist accommodation meeting NACE codes 55.10, 55.20 or 55.30), the trends were as shown below.

Figure 2. Trends in guest-nights in different tourist accommodation categories at EU27 level from 2015 to 2024.



Source: Eurostat business statistics (tour_occ_ninat)

The trends show steady growth in the EU27 demand for tourist accommodation in the years 2015 to 2019, followed by a sharp drop in 2020 due to the travel restrictions implemented in response to the COVID pandemic. A recovery began in 2021 and dramatically improved in 2022. By the year 2023, demand had exceeded pre-pandemic levels and a steady growth pattern appears to be resuming. The relative shares between the three categories of tourist accommodation changed slightly during the pandemic, but are now similar to pre-pandemic shares. Over 60% of guest-nights are for hotels (code 55.10), around 20-25% are for holiday and other short-stay accommodation, and the remainder is for campsites and caravan parks.

The background research also briefly considered:

- the main players in the tourist accommodation sector;
- the influence of accommodation provided via collaborative economy platforms;
- business strategies in response to the emergence and growth of online travel agencies;
- the background and coverage of the different ecolabel schemes in terms of licenses awarded.

Overall, there are many sustainability concerns and opportunities in the tourist accommodation sector and it can be a point of distinction in the market and, for larger enterprises, an integral part of corporate sustainability reporting.

Task 4: Assessment of environmental impacts associated with the different tourist accommodations within the scope along their life cycle

The research under task 4 was split into three main areas: a review of LCA literature, an in-depth consideration of the ongoing PEFCR for hotels, and the consideration of non-LCA impacts.

Regarding the LCA literature, the review shows that studies on tourist accommodation remain limited in number and scope. Only 14 studies were identified as sufficiently relevant, and even these vary significantly in system boundaries, assumptions and reporting methods. As a result, direct comparisons across studies are constrained, though broad patterns emerge. The most consistently assessed impact areas relate to energy use, water consumption and waste generation, reflecting the most measurable and operationally significant aspects of accommodation services.

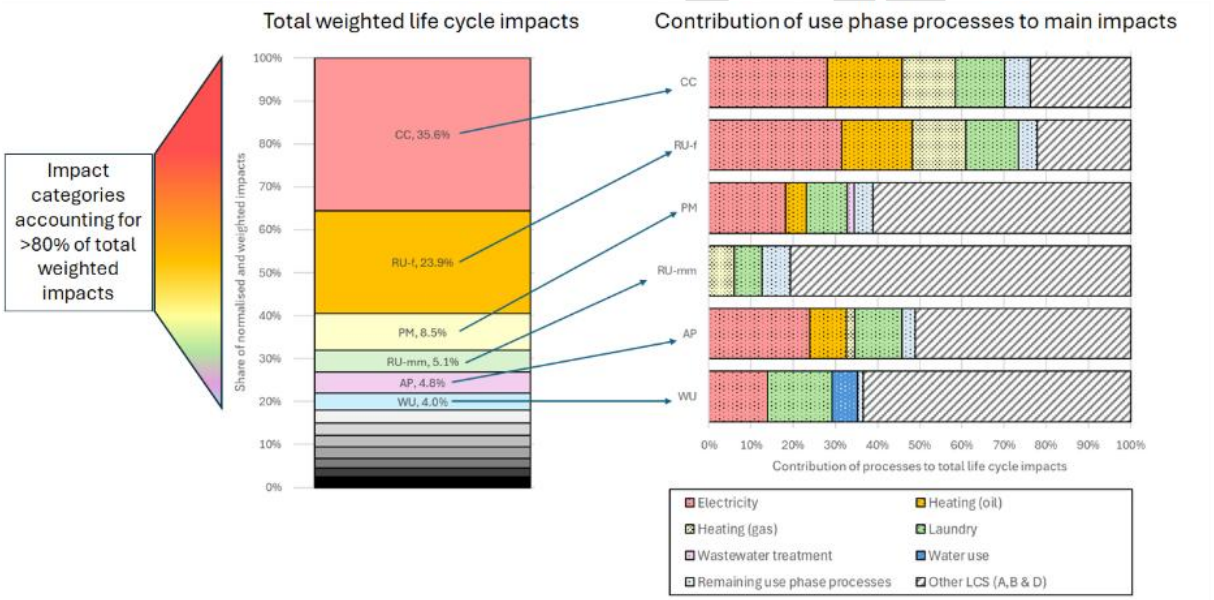
Across the reviewed studies, reported values span wide ranges, such as 1.3 to 30 kWh electricity/guest-night, 4.1 to 127 MJ fuel/guest-night, and 142 to 580 L water/guest-night. These figures highlight the diversity of accommodation types, climate conditions and service packages. Subsections examining water, energy and waste confirm that these domains typically dominate environmental performance and offer strong opportunities for improvement.

A complementary review of Best Environmental Management Practices (BEMP) identifies practical interventions that can reduce operational impacts. These include optimised water systems, efficient housekeeping and laundry processes, pool management improvements, greywater and rainwater reuse, waste separation, energy monitoring, improved building envelopes, high-efficiency HVAC systems, and the use of heat pumps and efficient lighting. Several BEMPs provide indicative savings and show how additional facilities (e.g. restaurants, pools, laundry services) can significantly increase per-guest environmental burdens.

Regarding the in-depth review of the PEFCR for hotels, it provides a structured and comprehensive LCA dataset that compensates for gaps in the literature. The PEFCR defines a functional unit of one night stay in an occupied room and analyses four life cycle stages: durable goods supply, room setup, hotel operation and end-of-life. The scope of the study did not include the actual construction of the hotel building, but did include the manufacture and supply of durable goods, the setting up of the hotel room, the operation of the hotel, and the end-of-life of durable goods.

Considering this scope and using the numbers reported in the PEFCR report for the representative hotel, it was possible to summarise both the main life cycle impacts in terms of total weighting (middle graph in the figure below) and the contribution of the most relevant use stage processes to each of those main impacts (right-hand graph in the figure below).

Figure 3. Infographic summarising the main weighted life cycle impact categories (left) and the most significant use phase process contributions to those main impacts over the whole life cycle (right).



Source: Own elaboration, based on data presented in the PEFCR study for hotels

In terms of overall scale, the two most relevant impact categories by far are climate change (CC) and fossil resource use (RU-f). In terms of contributing processes in the use phase, the three dominant processes were: electricity, heating, and laundry.

Regarding non-LCA impacts, biodiversity impacts, especially for rural or coastal accommodation, can arise from land use, landscaping, and recreational activities. Exposure to hazardous substances in cleaning agents and pool chemicals contributes to potential worker health in particular. Noise pollution affects both guest experience and surrounding communities, while indoor air quality and lighting quality links closely to staff and guest health and wellbeing. These non-LCA elements highlight the need for criteria that extend beyond resource use and emissions to capture broader sustainability performance.

Task 5: Analysis of the improvement potential

Using the PEFCR representative hotel as a baseline, a series of sensitivity analyses were conducted to see how variations in key operational parameters affect the weighted environmental impacts of a hotel guest-night, using an in-house LCA screening tool developed specifically for Task 5. The results show that environmental performance is highly dependent on local conditions, utility systems and operational practices, with electricity mix emerging as the most influential parameter overall.

Electricity mix: Changing the electricity grid mix leads to substantial shifts in impact categories, particularly climate change (CC) and resource depletion – fossil (ER). Using the Polish grid increases CC and ER by around 13% and 4%, while switching to the Swedish grid reduces these impacts by 9% and 6%, respectively. A scenario using 100% renewable energy results in the largest improvements, reducing CC by 10% and ER by 12%. Water use remains largely unchanged across scenarios. These results confirm that carbon intensity of national grids is a key driver of hotel environmental impacts.

Fuel consumption: Variations in fuel use, which is mainly for heating, sanitary hot water and for laundry when hot water intakes are installed in in-house washing machines, produce significant changes in emissions-related categories such as acidification, particulate matter and photochemical ozone formation. Facilities dependent on oil or coal-based heating see the largest increases, while efficient boilers or heat pump systems consistently reduce impacts.

Water consumption: Increases in water use directly elevate water use (WU) and related impact categories. The analysis shows that even modest changes in guest water consumption can meaningfully influence results, reflecting the high baseline water intensity of accommodation services.

Laundry: Laundry impacts are sensitive to wash frequency, machine efficiency, temperature, and chemical dosing. More frequent laundering or inefficient equipment increases energy use, chemical-related impacts and water use.

Consumables (toiletries): Although less significant than energy or water, changes in toiletry consumption mainly affect waste generation and certain toxicity-related categories, highlighting benefits from refill systems or bulk dispensers.

1. Scope, definitions and criteria structure

Scope

The existing scope (and definitions) text from Decision (EU) 2017/175 is presented below.

Existing scope from Decision (EU) 2017/175
Article 1: *1. The product group 'tourist accommodation' shall comprise the provision of tourist accommodation services and campsite services and any of the following auxiliary services under the management of the tourist accommodation provider:* *(1) food services;* *(2) leisure or fitness facilities;* *(3) green areas;* *(4) premises for singular events such as business conferences, meetings or training events;* *(5) sanitary facilities, washing and cooking facilities or information facilities available to campsite tourists, travellers and lodgers for collective use.* *2. Transportation services and pleasure voyages are excluded from the product group 'tourist accommodation'.*
Proposed scope in TR1
Article 1: Scope 1. The product group "Tourist accommodation in large hotels, holiday and other short-term rentals" shall comprise the provision to tourists, by an establishment and for a fee, of sheltered overnight accommodation in rooms, typically on a daily or weekly basis, for short-term stays. It includes at least a bed, and access to private or shared sanitary facilities. The modality of how the accommodation is booked or procured shall have no effect on its relevance to the scope. The scope shall also include establishments providing only seasonal accommodation services, establishments which are combined with other permanent or seasonal economic activities (for example vineyard plus accommodation etc.) and establishments which may offer additional services (for example restaurants, spas, access to attractions, conference facilities, swimming pools, gymnasiums etc.). Included in the scope are economic activities falling under the following NACE codes: • 55.10: Hotels and similar accommodation. • 55.20: Holiday and other short-stay accommodation. 2. Excluded from the scope are tourist accommodation services related to: • NACE code 55.30: Camping grounds and recreational vehicle parks. • NACE code 55.40: Intermediation service activities for accommodation. • NACE code 55.90: Other accommodation. • NACE code 68.20: Rental and operating of own or leased real estate – or any other activity under division 68 of NACE. • Rental of accommodation owned by private actors even when managed via the intermediation of profession service providers. • Timeshares or other emerging shared ownership or leasehold mechanisms. • Any overnight accommodation provided in marinas, means of transport and pleasure voyages.
Article 2: Scope 1. The product group "Tourist accommodation in small or medium hotels, holiday and other short-term rentals" shall comprise the provision to tourists, by an establishment and for a fee, of sheltered overnight accommodation in rooms, typically on a daily or weekly basis, for short-term stays. It includes at least a bed, and access to private or shared sanitary facilities. The modality of how the accommodation is booked or procured shall have no effect on its relevance to the scope. The modality of how the accommodation is booked or procured shall have no effect on its relevance to the scope.

The scope shall also include establishments providing only seasonal accommodation services, establishments which are combined with other permanent or seasonal economic activities (for example vineyard plus accommodation etc.) and establishments which may offer additional services (for example restaurants, spas, access to attractions, conference facilities, swimming pools, gymnasiums etc.).

Included in the scope are economic activities falling under the following NACE codes:

- 55.10: Hotels and similar accommodation.
- 55.20: Holiday and other short-stay accommodation.

2. Excluded from the scope are tourist accommodation services related to:

- NACE code 55.30: Camping grounds and recreational vehicle parks.
- NACE code 55.40: Intermediation service activities for accommodation
- NACE code 55.90: Other accommodation.
- NACE code 68.20: Rental and operating of own or leased real estate – or any other activity under division 68 of NACE.
- Rental of accommodation owned by private actors even when managed via the intermediation of professional service providers.
- Timeshares or other emerging shared ownership or leasehold mechanisms.
- Any overnight accommodation provided in marinas, means of transport and pleasure voyages.

Article 3: Scope

1. The product group "Campsite and/or caravan park accommodation" shall comprise the provision to tourists, by an establishment and for a fee, of short-term pitches equipped for any of the following structures: tents, caravans, mobile homes or camper vans, and of access to private or shared sanitary facilities. The modality of how the accommodation is booked or procured shall have no effect on its relevance to the scope.

The scope shall also include establishments providing only seasonal accommodation services, establishments which are combined with other permanent or seasonal economic activities (for example farm plus campsite and/or caravan park, service station plus campsite and/or caravan park etc.).

Included in the scope are economic activities falling under the following NACE codes:

- NACE code 55.30: Camping grounds and recreational vehicle parks.

2. Excluded from the scope are economic activities related to:

- NACE code 55.10: Hotels and similar accommodation.
- NACE code 55.20: Holiday and other short-stay accommodation.
- NACE code 55.40: Intermediation service activities for accommodation.
- NACE code 55.90: Other accommodation.
- Campsite and/or caravan park establishments exclusively dedicated to long-term letting of pitches.
- Campsite and/or caravan park accommodation provided by private actors.
- Any overnight accommodation provided in marinas, mountain refuge shelters and cabins.

Rationale for the proposed scope text

The scope text and associated definitions have been revised for clarity and consistency with statistical categories, while maintaining the substantive coverage of the previous version. The main reasoning for different aspects of the proposed scope is presented below.

Summary of relevant feedback from the preliminary questionnaire: In the scoping questionnaire, two highly relevant questions were asked about the scope of the product group.

- Should the scope be changed?: Responses were 26 "Yes", 32 "No opinion" and 25 "No".
- Should Short-Term Rentals (STRs) be included in the scope)?: Responses were 46 "Yes", 11 "No opinion", 18 "No" and 11 "Other".

There was an even split in opinion about whether or not to change the scope. Despite this, the same group of respondents showed a higher degree of support for having STRs in the scope. However, the issue of STRs has several nuances. Some stakeholders pointed out that certain STRs are already explicitly included in the scope, such as bungalows and cabins on campsites. It was emphasised that STRs are a rapidly expanding segment of the tourist accommodation sector. Many STRs are provided via collaborative economy platforms (e.g. Airbnb), while others may be part of diversification strategies of major hotel chains into apartment-hotels. If STRs are to be included in the scope in a general manner, the types of STRs that are being referred to should be clearly delineated.

Why proposing the scope in terms of NACE codes?: Regulation (EU) No 692/2011 describes a tourist accommodation establishment as: "*a local kind-of-activity unit, [...] providing as a paid service — although the price might be partially or fully subsidised — short-stay accommodation services as described in groups 55.1 (hotels and similar accommodation), 55.2 (holiday and other short-stay accommodation) and 55.3 (camping grounds, recreational vehicle parks and trailer parks) of NACE Rev. 2*".

This forms the basis for defining the scope around NACE codes 55.10, 55.20 and 55.30.

Why the split into three annexes?: A separate annex (annex III) was considered as legally justifiable for campsites and caravan parks because the fundamental nature of the accommodation being provided is different. The core business of the NACE 55.30 activity is the provision of exclusive areas in land designated as camping grounds and/or caravan parks – which is different to that of NACE 55.10 and 55.20, where the establishment is always defined by enclosed buildings and always involves the provision of a bed.

Regarding annexes I and II, it was considered whether a split into NACE codes 55.10 and 55.20 would be justified. According to the definitions, the main distinctions between these two categories are:

- The provision of daily cleaning services and on-the-spot customer service is mandatory in NACE code 55.10, but optional in 55.20.
- The provision of a self-contained living/dining facility is mandatory in NACE 55.20.

The distinctions between these two activities are being blurred by the rise in "apartment-hotels". Instead of distinguishing between NACE codes 55.10 and 55.20, it was considered more appropriate to keep these codes together and instead distinguish based on the size of the accommodation establishment.

Stakeholder feedback in the preliminary questionnaire generally concluded that the "one-size-fits-all" approach in the existing EU Ecolabel criteria were favouring the larger hotels. With larger establishments, especially multi-establishment chains, it is more likely that a member of staff can be dedicated to the sustainability aspects. The more complex and technical the EU Ecolabel criteria become, the more disproportionate the burden on SMEs. Consequently, it was considered most appropriate to split this activity into Annex I (for large enterprises) and Annex II (for small and micro enterprises). While most of the themes would be the same, the criteria proposals will be less burdensome in Annex II.

Why the statement on modality of booking?: There are many different ways in which potential guests can find tourist accommodation. For example, via direct bookings (phone or internet), via online travel agents, or via collaborative economy platforms. While intermediation services (NACE

code 55.40) are explicitly excluded from the scope of the EU Ecolabel, this should not mean that they cannot be used to connect potential guests with operators of EU Ecolabel tourist accommodation. The clause is therefore inserted for the avoidance of doubt on this point.

Why the clause on seasonal accommodation and combinations with other services?: This clause was added to clarify that such tourist accommodation can also apply for the EU Ecolabel. When additional services are also available, whether or not they are covered by criteria proposals will be considered on a criterion-by-criterion basis. It is foreseeable that restaurants may be covered by establishment-wide waste management systems and that swimming pools and associated showers may be affected by establishment-wide water efficiency requirements, for example.

Boundaries of the scope: The boundaries of the scope are now linked to the NACE Rev. 2.1 categories. Each of these categories are clearly defined in more detail by Eurostat (see descriptions in Table 17 on the Annex 1), and are largely reflected in the proposed EU Ecolabel definitions in section 3.2.

Table 1. NACE revision 2.1 statistical categories.

Division	Group	Class	Heading
I. Accommodation and food service activities	55. Accommodation	55.1. Hotels and similar accommodation	55.10. Hotels and similar accommodation
		55.2. Holiday and other short-stay accommodation	55.20. Holiday and other short-stay accommodation
		55.3. Camping grounds and recreational vehicle parks	55.30. Camping grounds and recreational vehicle parks
		55.4. Intermediation service activities for accommodation	55.40. Intermediation service activities for accommodation
		55.9. Other accommodation	55.90. Other accommodation
	56. Food and beverage service activities	[...]	[...]

Source: Eurostat (2025) NACE Rev. 2.1 – Statistical classification of economic activities in the European Union doi:10.2785/155339

The precise choice of wording in the scope and definition proposals was based on a combination of material from Regulation (EU) No 692/2011 concerning European statistics on tourism, and the more detailed definitions and interpretations provided in the Eurostat methodological manual for tourism statistics (v3.1) from 2014 and the more recent set of Eurostat definitions for NACE codes published in 2025.

The proposed scope also uses the term “establishment”, which also merits a definition of its own due to the need to distinguish between accommodation offered by private individuals and by enterprises. The category 55.40 is new in NACE Revision 2.1. A comparison of what the two main Eurostat manuals say about these categories is provided in Table 17 in the Annex 1.

Definitions

The existing text on definitions from Decision (EU) 2017/175 is presented below.

Existing definitions from Decision (EU) 2017/175
Article 2: *For the purpose of this Decision, the following definitions shall apply:* *(1) 'tourist accommodation services' means the provision, for a fee, of sheltered overnight accommodation in rooms, including at least a bed, and of private or shared sanitary facilities, offered to tourists, travellers and lodgers;* *(2) 'campsite services' means the provision, for a fee, of pitches equipped for any of the following structures: tents, caravans, mobile homes, camper vans, bungalows and apartments, and of private or shared sanitary facilities, offered to tourists, travellers and lodgers;* *(3) 'food services' means the provision of breakfast or other meals;* *(4) 'leisure or fitness facilities' means saunas, swimming pools, sport facilities and wellness centre accessible to guests or non-residents or both;* *(5) 'green areas' means parks, gardens or other outside areas which are open to tourists, travellers and lodgers.*
Proposed definitions in TR1
For the purpose of this Decision, the following definitions shall apply: 1. 'bivouac facilities', for the purposes of this decision, means a simple, temporary camp, often with only very rudimentary shelter, that are mainly used by hikers, mountaineers, soldiers, or emergency situations. Bivouac facilities include extremely basic shelter structures such as emergency huts, rock overhangs, or simple wooden refuges. These facilities are normally unstaffed and without any services (plumbing, electricity etc.). 2. 'campsite and/or caravan park accommodation' means, under NACE code 55.30, the provision of short-term accommodation in camping grounds (for example recreational camps, fishing and hunting camps) and/or the provision of space and facilities for recreational vehicles. This class also includes glamping accommodation. facilities. It excludes establishments exclusively dedicated to long-term letting of pitches. For the purposes of this Decision, it also excludes accommodation provided by protective shelters or plain bivouac facilities. 3. 'establishment', for the purposes of this decision, means an enterprise or part of an enterprise that is situated in a single location and in which the provision of tourist accommodation under NACE codes 55.10, 55.20 or 55.30 is the single productive activity or the principal productive activity accounting for most of the value added. 4. 'glamping', for the purposes of this decision, means an accommodation category characterized by semi-permanent, experience-oriented outdoor lodging - such as safari tents, yurts, cabins, pods, or treehouses - equipped with enhanced amenities well above standard camping, aimed at delivering comfort, convenience, and a premium guest experience. 5. 'holiday and other short-stay accommodation', under NACE code 55.20, means the provision of short-term accommodation, typically on a daily or weekly basis, in self-contained furnished rooms or areas for living/dining and sleeping. Typically, no on-the-spot customer service and minimal complementary services, if any, are provided. This may take the form of holiday homes and apartments, visitor flats and bungalows, cottages and cabins without housekeeping services, hostels, bed and breakfast units and mountain huts and lodges. This class excludes the provision of furnished short-stay accommodation with daily cleaning, bed-making, food and beverage services (see 55.10 of NACE), the provision of homes and furnished or unfurnished flats or apartments for more permanent use, typically on a monthly or annual basis (see division 68 of NACE). For the purposes of this Decision, it also excludes guest rooms provided by private households. 6. 'hotels and similar accommodation', under NACE code 55.10, means the provision of accommodation, typically on a daily or weekly basis, for short-term stays. It also includes the provision of furnished accommodation in hotels rooms and suites. Services provided include daily

cleaning and bed-making. A range of additional services may be provided (for example, food and beverage services, laundry services, recreational facilities as well as conference and convention facilities). These activities are generally characterised by the provision of on-the-spot customer service. This class includes accommodation provided by hotels, resort hotels and suite/apartment hotels. This class excludes accommodation without daily cleaning, bed-making and on-the-spot customer service, see 55.20.

7. 'intermediation service activities for accommodation', under NACE code 55.40, means the intermediation of all types of accommodation by bringing clients and service providers together for a fee or commission. These intermediation activities can be carried out on digital platforms or through non-digital channels (phone, post, and so on). The fee or commission can be received from either the client or the provider of the accommodation. Revenue for the intermediation activities can include other sources of income (for example, revenues from the sale of advertising space). It also includes timeshare exchange services and reservation services for accommodation.
8. 'large hotels, holiday and other short-term rentals', means establishments with at least 100 rooms that fall under NACE code 55.10 or 55.20.
9. 'medium hotels, holiday and other short-term rentals', means establishments with between 25 and 99 rooms (inclusive), that fall under NACE code 55.10 or 55.20.
10. 'other accommodation', under NACE code 55.90, means the provision of temporary accommodation in homes, flats or apartments, as well as single or shared rooms or dormitories for students, seasonal workers and other individuals that does not fall under NACE codes 55.10, 55.20 or 55.30.
11. 'rental of accommodation by private actors' means the rental to tourists of homes, flats or apartments owned and operated by an individual citizen or group of citizens and not by an enterprise or an establishment.
12. 'small hotels, holiday and other short-term rentals', means establishments with less than 25 rooms, that fall under NACE code 55.10 or 55.20.
13. 'short-term rentals', for the purposes of this decision, shall be considered as synonymous with short-term accommodation, and meaning tourist accommodation offered by an establishment and falling within the scope of NACE 55.20 that is offered for bookings in terms of days or weeks.
14. 'tourist' means a traveller moving between different geographical locations, or a visitor taking a trip to a destination that is beyond their usual environment.

Rationale for the proposed definitions

The number of definitions has increased from 5 to 14, and all of the proposal definitions are different to the existing ones. The new definitions match with key terms used in the new scope text. This includes the definition of terms like "establishment" and "tourist".

For additional clarity, definitions that generally align with the NACE codes is also provided. This applies not only to codes 55.10, 55.20 and 55.30 regarding what is in the scope, but also to 55.40 and 55.90, to clarify what is out of the scope. This accounts for 5 definitions in total. Nonetheless, some minor modifications were made to these definitions based on their suitability for the EU Ecolabel, namely:

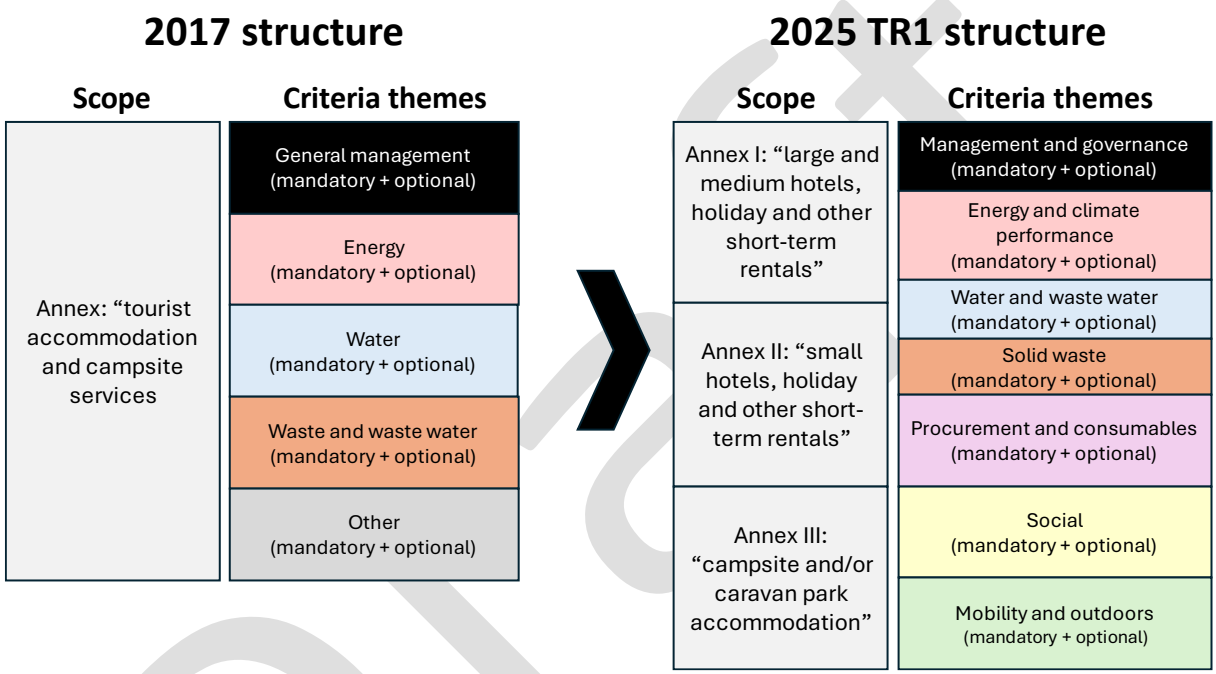
- Bivouac facilities, which are included under NACE 55.30 statistics, are not counted in the EU Ecolabel scope. The main reason is that these facilities are so basic that most criteria would be impossible to meet or be unapplicable in the first place.
- Guest rooms provided by private households, which are included under NACE 55.20 statistics, are not counted in the EU Ecolabel scope. The main reasons are: (i) that the accommodation provider could be a private individual and not an enterprise, and (ii) that this type of accommodation would open up the scope to Airbnb type accommodation hosted by individual citizens, which is not deemed suitable for the EU Ecolabel assessment and verification process.

Due to the importance of the size of the establishment on the scope, definitions have been provided for small, medium and large tourist accommodation establishments based on the number of rooms available for guests to book. This permits a clear rule for knowing when a certain establishment would fall within Annex I or Annex II of the scope.

Restructuring of the criteria

The new proposal includes restructuring both in terms of the scope, and in terms of the criterion themes.

Figure 4. Comparison of scope and criteria theme structure in 2017 and in TR1 proposals



Source: Own elaboration.

At a glance, the main changes are:

- Going from Water / Waste and wastewater → Water and wastewater / Solid waste.
- Adding a dedicated theme on "procurement and consumables".
- Adding a dedicated theme on "social".

<u>Rationale for the proposed restructuring</u>

On water and wastewater: The combination of water and wastewater is a logical change since both of these systems are inter-related, especially in the case of greywater reuse systems. Combining these aspects together also allows for a more holistic approach to the criteria, where the overall goal of reducing potable water consumption can be promoted in different ways, either by more efficient water using devices and fittings, or by the use of alternative sources of water (i.e. harvested rainwater or reused greywater).

On consumables: The criteria adopted in 2017 include a number of provisions that could be described as "*consumables*", which are grouped under poorly related themes. For example, "*paper products*", "*detergents and toiletries*" are grouped under the original "*Waste and wastewater*" theme.

Grouping the criteria on relevant consumables under a common theme with "procurement" is especially relevant for large establishments or chains of establishments, who procure sufficiently large volumes as to be able to dictate conditions to potential suppliers. In this theme, we aim to explain the potential power of suitable procurement exercises and product ecolabels to reduce the environmental impacts of consumables. There are different approaches which can be taken to procurement criteria so that this does not present excessively reduced offers or competition amongst suppliers. These will be explored in more detail in this dedicated theme.

On social criteria: The addition of a dedicated theme on social criteria will make the existing requirements be easier to identify and create a clear point in the criteria for adding other social requirements. The lack or perceived lack of social criteria was considered as a weak point by respondents to the existing questionnaire and was one of the main reasons why the EU Ecolabel for tourism accommodation was not formally endorsed by the GSTC.

Other themes: Finally, there are other possible criteria themes that could be included, with the main candidates being "biodiversity / landscape management", "food and beverage", and "sustainable mobility". Most of the criteria under these themes are likely to be highly dependent on the specifics of the tourist accommodation establishment. Two of these aspects are explicitly covered in a new theme titled "mobility and outdoors".

2. Annex preamble

The general text that appears before any EU Ecolabel criteria is a relatively standard text common to all EU Ecolabel product groups plus some product group-specific parts. The text of the common part has gradually evolved over the years. As a general rule, the individual criteria are no longer listed in this part of the legal text, so they are not reproduced here even when quoting the 2017 text. The common part of the TR1 proposal is largely taken from the recently adopted paints and varnishes product group ([10]).

Existing general Assessment and Verification text from Decision (EU) 2017/175
ASSESSMENT AND VERIFICATION *The specific assessment and verification requirements are indicated within each criterion set out in Sections A and B.* *Where the applicant is required to provide declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, these may originate from the applicant or its supplier(s), etc., as appropriate.* *Competent bodies shall preferentially recognise attestations which are issued by bodies accredited according to the relevant harmonised standard for testing and calibration laboratories and verifications by bodies that are accredited according to the relevant harmonised standard for bodies certifying products, processes and services. Accreditation shall be carried out according to the provisions of Regulation (EC) No 765/2008 of the European Parliament and of the Council (1).* *Information extracted from environmental statements submitted under the eco-management and audit scheme (2) (EMAS) of the Union are considered equivalent means of proof as the attestations mentioned in the previous paragraph.* *Where appropriate, test methods other than those indicated for each criterion may be used if the competent body assessing the application accepts their equivalence.* *Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications.* *Competent bodies shall carry out an initial on-site visit before awarding the EU Ecolabel licence and may perform follow up on-site visits periodically during the award period.* *As a pre-requisite, the services shall meet all respective legal requirements of the country (countries) in which the 'tourist accommodation' is located. In particular, the following shall be guaranteed:* *1. The physical structure respects Union, national and local laws and regulations regarding energy efficiency and thermal insulation, water sources, water treatment and waste water disposal (including chemical toilets), waste collection and disposal, maintenance and servicing of equipment, safety and health dispositions and any relevant laws or regulations of the area related to landscape and biodiversity conservation.* *2. The enterprise is operational and registered, as required by national or local laws and its staff are legally employed and insured. For this purpose, staff shall have a national legal written contract, shall be paid at least the national or regional minimum wage set by collective agreements (in the absence of collective agreements, the staff shall be paid at least the legal national or regional minimum wage), and shall have working hours complying with the national law.* *The applicant shall declare and demonstrate the service's compliance with those requirements, using independent verification or documentary evidence without prejudice of data protection national law (e.g. construction license/authorisation, declarations of professional technicians explaining how national legislation and local regulations related to the above mentioned aspects of the building are met, copy of a written social policy, copies of contracts, statements of employee's registration in the national insurance*

[10] Decision is pending publication in the Official Journal. A final draft version of the full text is available at this link.

system, official documentation/register recording the names and number of employees by the local Government's Employment Inspectorate or Agent) and moreover direct random staff interview could be done during on-site visit.

Proposed general Assessment and Verification text for TR1

The EU Ecolabel criteria target the best tourist accommodation establishments on the market, in terms of environmental performance. The criteria predominantly focus on the main environmental impacts associated with the life cycle of tourist accommodation and promote circular economy aspects.

Assessment and verification requirements

For the EU Ecolabel to be awarded to a specific tourist accommodation establishment, the establishment shall comply with each mandatory requirement and obtain at least X % of the total points available from applicable optional criteria. The applicant shall provide a written confirmation stating that all the criteria are fulfilled.

~~The s~~Specific assessment and verification requirements are indicated within each criterion~~set out in Sections A and B~~.

Where the applicant is required to provide declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, these may originate from the applicant ~~or its~~ and/or their supplier(s) ~~etc.,~~ as appropriate.

Competent bodies shall preferentially recognise attestations that are issued by bodies accredited ~~according to~~ in accordance with the relevant harmonised standard for testing and calibration laboratories, and verifications by bodies that are accredited ~~according to~~ in accordance with the relevant harmonised standard for bodies certifying products, processes, and services. ~~Accreditation shall be carried out according to the provisions of Regulation (EC) No 765/2008 of the European Parliament and of the Council (1).~~

Information extracted from environmental statements submitted under the eco-management and audit scheme (1) (EMAS) of the Union are considered equivalent means of proof as the attestations mentioned in the previous paragraph.

Where appropriate, test methods other than those indicated for each criterion may be used if the competent body assessing the application accepts their equivalence.

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications.

Competent bodies shall carry out an initial on-site visit before awarding the EU Ecolabel licence and may perform follow up on-site visits periodically during the award period.

Changes in suppliers that would affect the number of points awarded under the licence shall be notified to competent bodies, together with supporting information to enable continued compliance with the criteria.

As a pre-requisite, the services shall meet all respective legal requirements of the country ~~(countries)~~ in which the ~~'~~tourist accommodation~~'~~ establishment is located. In particular, the following shall be guaranteed:

1. The physical structure respects Union, national and local laws and regulations regarding energy efficiency and thermal insulation, water sources, water treatment and wastewater disposal (including chemical toilets), waste collection and disposal, maintenance and servicing of equipment, safety and health dispositions and any relevant laws or regulations of the area related to landscape and biodiversity conservation.

2. The enterprise is operational and registered, as required by national or local laws and its staff are legally employed and insured. For this purpose, staff shall have a national legal written contract, shall be paid at least the national or regional minimum wage set by collective agreements (in the absence of collective agreements, the staff shall be paid at least the legal national or regional minimum wage), and shall have working hours complying with the national law.

The applicant shall declare and demonstrate the service's compliance with those requirements, using independent verification or documentary evidence without prejudice of data protection national law (e.g. construction license/authorisation, declarations of professional technicians explaining how national legislation and local regulations related to the above mentioned aspects of the building are met, copy of a written social policy, copies of contracts, statements of employee's registration in the national insurance system, official documentation/register recording the names and number of employees by the local

Government's Employment Inspectorate or Agent) and moreover direct random staff interview could be done during on-site visit.

The applicant shall describe the tourist accommodation establishment in terms of the following aspects:

- Relevant NACE code.
- (For annex I and II only) The star rating.
- (For annex I and II only) Number of guest rooms and bedspaces are provided.
- (For annex III only) Number of tent pitches, caravan pitches and guest rooms (if any) provided.
- The location.
- Parking facilities (e.g. number of spaces for cars, electric scooters and bicycles and are they owned or otherwise controlled by the tourist accommodation enterprise).
- Size of the plot area belonging to the tourist accommodation establishment (in m2).
- Breakdown of the plot area (in both m2 and % of total plot area) into:
    - Area occupied by buildings.
    - Area occupied by access roads and parking.
    - Area occupied by impermeable paving (excluding roads and parking).
    - Area occupied by green space.
- Total conditioned (i.e. temperature regulated) internal floor area (in m2).
- (For annex I and II only) Total guest room floor area (in m2).
- The energy carriers and systems used for space heating and for water heating.
- Extent of in-house and offsite laundry.
- Extent of food and beverage services to guests and general public. And, if applicable, are these services owned or otherwise controlled by the tourist accommodation enterprise?
- Extent of event or MICE facilities (MICE: Meetings, Incentives, Conferences and Exhibitions) And, if applicable, are these services owned or otherwise controlled by the tourist accommodation enterprise?
- Extent of leisure facilities (e.g. swimming pool, gymnasium, tennis court(s), golf course etc.). And, if applicable, are these services owned or otherwise controlled by the tourist accommodation enterprise?
- Extent of health/wellness facilities or services (e.g. spa, sauna, jacuzzis, massage service, steam baths, beauty centre, etc.). And, if applicable, are these services owned or otherwise controlled by the tourist accommodation enterprise?

(1) Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS), repealing Regulation (EC) No 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC (OJ L 342, 22.12.2009, p. 1).

559 Rationale for the proposed Annex preamble

560 About the general wording changes, most of the proposed changes are alignments with the
561 latest structure in the most recently adopted EU Ecolabel Decision, which was for paints and
562 varnishes in June 2025.

563 About the points threshold, a paragraph on the need to comply with all mandatory criteria and
564 obtain a minimum % of the total applicable optional points is included as well. A similar statement
565 to this effect is provided in the paints and varnishes preamble. However, since the criteria for that
566 product group are all mandatory, and the criteria for tourist accommodation are a mix of
567 mandatory and optional, a different wording is used. The requirement on a minimum number of
568 points from the optional criteria is stated directly in the Act of Decision (EU) 2017/175 (in Articles 3,
569 4 and 5). It will later be checked what is the best approach to defining the minimum number of
570 points required (i.e. stating in the Act only, in the Annex preamble only, or in both). Regardless, one

change being proposed is to set the threshold as a minimum percentage of the total points available, as this is the simplest way of providing equal treatment to tourist accommodation with different amounts of applicable optional criteria.

About the description of the establishment, this is a new requirement and is considered as necessary for ensuring a consistent approach to describing the tourist accommodation establishments. There are several reasons for requesting this type of information:

- To determine which optional criteria apply to the establishment in question.
- Consequently, to determine what the maximum possible number of points could be obtained, and what the minimum number of points required would be (i.e. a fixed percentage of those maximum points).
- To focus applicant attention on the key features of tourist accommodation establishments that are important for the EU Ecolabel criteria from the very beginning of the application process.
- To obtain better context about the characteristics of tourist accommodation establishments which could be of relevance for understanding why uptake is higher or lower with different types of establishment.

For the user manual, a specific template for the description of the tourist accommodation establishment should be provided. If any establishment would volunteer, the example could be based on a real-world case. Otherwise, a hypothetical example will be provided.

3. Annex I: Criteria proposals and rationale

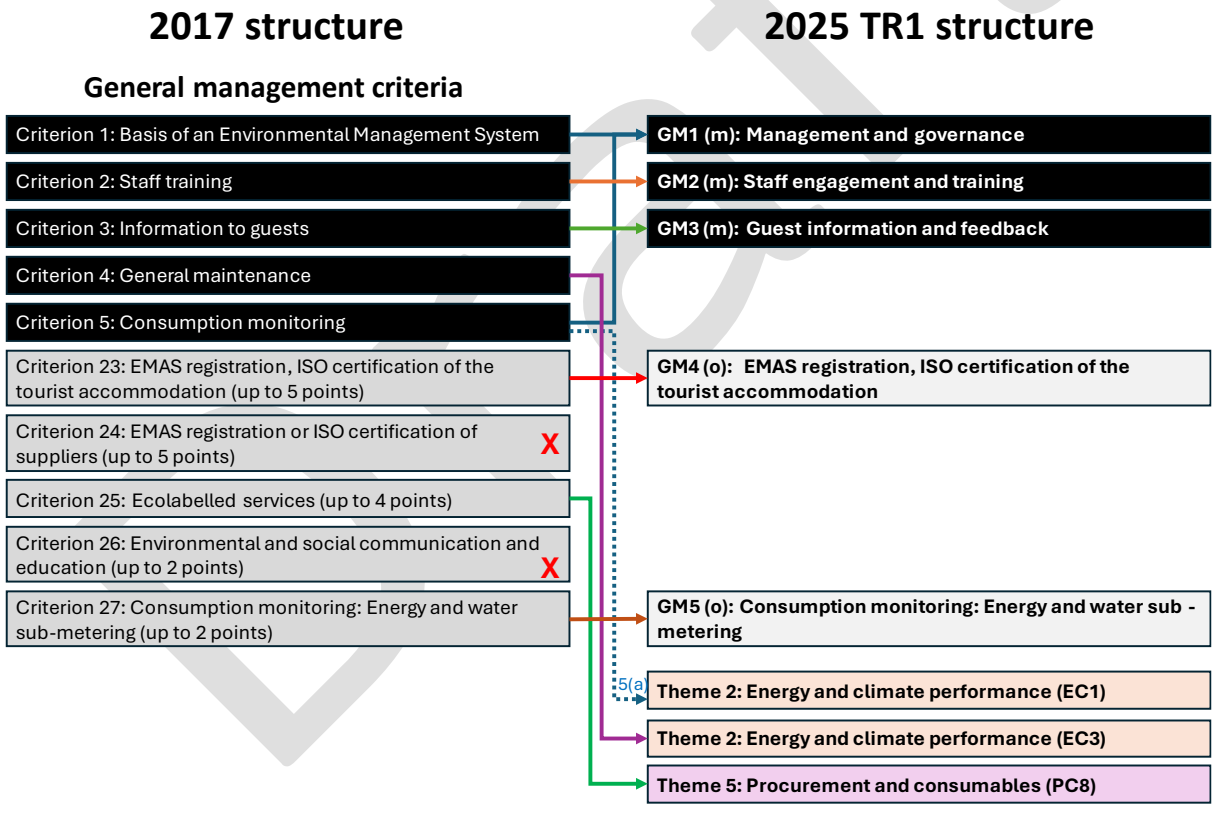
As described in the scope, Annex I corresponds to "*tourist accommodation in large hotels, holiday and other short-term rentals*".

Please note that all optional criteria proposals have "X points" denoted. This indicates that the exact number of points to allocate has not yet been considered, since it will first be necessary to have a settled number of optional criteria before deciding on the precise distribution of points. In some cases, different multiples of X are indicated in the same criterion. This is simply to indicate the relative importance or weighting of those specific parts of that criterion.

Theme 1: General management

A comparison of the individual criterion headings in the 2017 criteria and the TR1 proposals under the theme of "general management" is illustrated below.

Figure 5. Comparison of existing general management criteria with TR1 proposal



Source: Own elaboration

Regarding criteria structure, the restructuring of the original five mandatory GM criteria (Nos 1 to 5) has consolidated them into three mandatory criteria (GM1: Management and governance; GM2: Staff engagement and training; GM3: Guest information and feedback). All of criterion no. 4 and part of criterion no. 5 (5a) are considered as being more appropriate in the theme under energy and climate performance. Criterion no. 4 is almost exclusively related to energy using equipment already. Regarding criterion 5(a) on energy reporting requirements, moving this to a dedicated standalone criterion on the EC theme allows it to be presented and described in more detail. Overall,

the aim is to reduce the number of criteria but also make the content of the remaining criteria more detailed.

With the optional criteria, the number in the GM theme is reduced from five to two. Two are no longer proposed (Nos 24 and 26), while another (no. 25) is considered as being more appropriately placed in the theme of procurement and consumables (becoming PC8).

One of the main reasons for removing criterion 24 on local supplier certification is that the applicant cannot control how close certified suppliers are to their establishment, which they cannot move. Other reasons include a lack of clarity about how to distinguish what is a "main supplier" and even what is a "supplier" in the first place. Furthermore, there may be many "local suppliers" who are simply intermediary or final actors in the distribution of a product manufactured in a facility that lies far beyond the 160km radius around the tourist accommodation establishment. This could undermine the whole concept of "local supply".

The removal of criterion 26 on environmental and social communication was removed because it was vague and wide open to interpretation. The term "shall provide environmental communication and education notices on local biodiversity, landscape and nature conservation measures to guests" could range from a single small message or a large series of posters, books and videos that are laid out for guests. Furthermore, the term "Guest entertainment includes elements of environmental education (e.g. books, animations, events)", it is not clear what exactly would be considered as "environmental education". This second part of the removed criterion could potentially come back, but it would need to be accompanied by a clear definition of what is considered as "environmental education".

The rationale for criterion 25 being moved to the Procurement and Consumables theme is because this requirement refers to the procurement of services from external service providers. This type of requirement sits well with the PC theme, which is mostly focused on the procurement of goods from external suppliers.

Preliminary stakeholder questionnaire results showed that mandatory general management criteria were among the top three themes considered to be in most need of revision (see Task 1 section in the Background Report).

Integrating consumption monitoring directly within each relevant Theme (e.g. energy, water and waste, solid waste and procurement and consumables) ensures that oversight is closely aligned with the specific environmental aspects being managed. This avoids the need for a separate, stand-alone monitoring criterion while maintaining a systematic approach to data collection, tracking, and corrective actions embedded where they are most operationally relevant.

Regarding anonymised licence holder data, a review of points awarded to 43 different licences were provided by CBs. The table below presents an overview of where points were awarded and which optional general management criteria were being complied with. In cases where the result is less than 20% of the maximum possible, the cell is shaded red, if between 20% and 60%, it is shaded yellow, and if more than 60%, it is green.

Table 2. Points awarded to optional general management criteria in Decision (EU) 2017/175

General management optional criteria	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. pts/ Max. pts	With points	Avg. pts/ Max. pts	With points	Avg. pts/ Max. pts
23. EMAS, ISO of TAS	3 of 20	4.33 / 5	0 of 3	n/a	0 of 20	n/a
24. EMAS, ISO of suppliers	3 of 20	4 / 5	1 of 3	2 / 5	7 of 20	3.92 / 5

General management optional criteria	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. pts/ Max. pts	With points	Avg. pts/ Max. pts	With points	Avg. pts/ Max. pts
25. Ecolabel services	4 of 20	2 / 4	0 of 3	n/a	5 of 20	2.4 / 4
26. Envi. and social education	18 of 20	1.56 / 2	3 of 3	1.33 / 2	18 of 20	1.78 / 2
27. Consumption monitoring	14 of 20	1.86 / 2	0 of 3	n/a	4 of 20	1.5 / 2
Average points awarded for general management		4.35		2.00		4.25

Source: Anonymised data provided by competent bodies

The data provided by competent bodies also included a distinction based on the nature of the tourist accommodation in line with the options that can be filtered on the EU Ecolabel tourist accommodation catalogue. The data could be split into hotels, cottages and campsites, which more or less aligns with the proposals for annexes I, II and III in TR1.

Insights are limited because the data provided (n=43) represents less than 5% of the total EU Ecolabel licenced tourist accommodation. The very low number of datasets for cottages (n=3) makes it difficult to draw any meaningful conclusion on that data. Focusing on campsites and hotels (each n=20), it was clear that the most frequently applied optional criteria were those relating to numbers 26 and 27, and these also got more than 60% of the available points on average. The lowest uptake was observed with the option about the applicant being EMAS or ISO certified (criterion 23).

A full comparison of the TR1 proposals with any existing requirements in Decision (EU) 2017/175 is provided in the tables below.

GM1 (m): Management and governance

Existing requirements on management and governance from Decision (EU) 2017/175
Criterion 1. Basis of an Environmental Management System *The tourist accommodation shall set the basis of an Environmental Management System by implementing the following processes:* *— an environmental policy identifying the most relevant environmental aspects regarding energy, water and waste relevant to the accommodation,* *— a precise action programme establishing targets on environmental performance regarding identified environmental aspects, which shall be set at least every 2 years, taking into consideration requirements set by this EU Ecolabel Decision.* *If environmental aspects identified are not addressed by this EU Ecolabel, targets should preferably be based on environmental performance indicators and benchmarks of excellence set by the reference document on best environmental management practice for the tourism sector (3) (EMAS),* *— an internal evaluation process allowing verifying at least yearly organisation performances with regard to the targets defined in the action program and setting correction actions if needed.* *Information on the processes mentioned in the previous paragraph shall be available for consultation by the guests and staff.* *Comments and feedback from guests collected by means of the questionnaire referred in criterion 3 shall be evaluated in the internal evaluation process and in the action programme, if necessary.* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion, together with:* *— a copy of the environmental policy,* *— the action programme, and* *— the evaluation report, which shall be made available to the competent body within 2 years after the application, and the updated version every 2 years.* *Applicants registered under EMAS or certified according to ISO 14001 shall be deemed to comply. In this case, ISO 14001 certificate or EMAS registration shall be provided as a means of proof. In case of ISO 14001 certification, a report summarising performances with regard to the targets defined in the action programme shall be joined to the application.*

Criterion 5. Consumption monitoring

The tourist accommodation shall have procedures for collecting and monitoring data monthly or, at least, yearly, on the following aspects as a minimum: (a) specific energy use (kWh/guest night and/or kWh/m2 (of indoor area) year); (b) percentage of final energy use met by renewable energy generated on site (%); (c) water consumption per guest-night (litres/guest-night) including the water used for irrigation (if applicable) and any other activities related to water consumption; (d) waste generation per guest-night (kg/guest-night). Food waste shall be monitored separately (1); (e) consumption of chemical products for cleaning, dishwashing, laundry, sanitising and other special cleaners (e.g. swimming pool backwashing) (kg or litres/guest-night), specifying if they are ready-to-use or undiluted; (f) percentage of ISO Type I label products (%) used under the applicable optional criteria in this EU Ecolabel Decision.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion, together with a description of the collecting and monitoring procedures. The tourist accommodation shall report a short summary of the data collected for the above-listed consumption parameters together with the internal evaluation report mentioned in criterion 1, which shall be made available to the competent body within 2 years after the application, and every 2 years

Proposed criterion (GM1(m)) on management and governance in TR1

The tourist accommodation establishment shall have implemented and maintain an Environmental Management System (EMS), and have an appointed person to be responsible for all operational aspects of the EMS.

The EMS shall include the following elements:

(a) An environmental policy identifying the most relevant environmental aspects regarding energy, water, waste, and, where applicable, chemical use. ~~Information on the processes mentioned in the previous paragraph shall be available for consultation by the guests and staff.This policy shall be communicated to staff and made publicly available to guests and other interested parties.~~

(b) A detailed action programme establishing measurable targets on ~~environmental~~ performance for the identified environmental aspects. Targets shall be reviewed and updated at least every ~~2~~two years, taking into consideration the requirements ~~set by~~ of this EU Ecolabel Decision. Where relevant ~~if~~environmental aspects ~~identified~~are not ~~addressed~~covered by the~~is~~ EU Ecolabel, targets ~~should~~shall preferably be based on environmental performance indicators and benchmarks of excellence ~~set by~~defined in the EMAS Sectoral Reference Document ([11])~~on best environmental management practice~~ for the tourism sector ~~(EMAS)~~.

(c) An internal evaluation process ~~allowing verifying at least yearly organisation performances with regard to the targets defined in the action program and setting correction actions if needed~~that enables reporting on at least the following data:

- Specific energy ~~use~~ consumption (kWh/guest night and~~/or~~ kWh/internal conditioned m² per year) (linked to EC1).
- Percentage of final electricity~~energy~~ use supplied ~~met~~by onsite renewable generation ~~renewable energy generated on site~~(%) (linked to EC11).
- Water consumption per guest-night (litres/guest-night), including ~~water used for~~irrigation ~~(if applicable)~~where relevant.
- Waste generation per guest-night (kg/guest-night), food waste shall be monitored separately.
- Consumption of chemical products for cleaning, dishwashing, laundry, sanitising, and other special ~~cleaners~~processes (kg or litres/guest-night), specifying if they are reported as ready-to-use quantities or as undiluted quantities.
- Percentage of ISO Type I labelled products ~~(%)~~ used under the applicable optional criteria ~~in this EU Ecolabel Decision~~.

[11] Commission Decision (EU) 2016/611 of 15 April 2016 on the reference document on best environmental management practice, sector environmental performance indicators and benchmarks of excellence for the tourism sector under Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS) (OJ L 104, 20.4.2016, p. 27).

The internal evaluation process shall include:

(i) Verification of compliance with targets defined in the action programme.

(ii) Logging and records of preventative maintenance checks for energy and water systems, including HVAC, refrigeration, plumbing, and irrigation, to ensure proper functioning and detect leaks (linked to EC3).

(iii) Assessment of corrective actions where targets are not met.

(iv) Consideration of feedback collected from guests (linked to GM3).

All information resulting from monitoring, maintenance and evaluation shall be made available for consultation by staff and guests.

Assessment and verification: The applicant shall provide a declaration of compliance~~,~~ together with:
— a copy of the environmental policy,
— a copy of the action programme including measurable targets and data from the last year, if available, and
— within two years ~~after application~~ of the licence being awarded, the evaluation report~~and the updated version every 2 years~~, including tracking of compliance with targets, maintenance records, a record of any corrective actions taken (if needed) and a description of how guest feedback has been considered. Updated evaluation reports shall be submitted to the competent body every two years.

Applicants registered under EMAS or certified according to ISO 14001 shall be deemed to comply. In the case of ISO 14001 certification, a report summarising performances against the action programme targets shall be submitted as evidence.

GM2 (m): Staff engagement and training

Existing requirements on guest information from Decision (EU) 2017/175
Criterion 2. Staff training *(a) The tourist accommodation shall provide information and training to the staff (including subcontracted external staff), including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. In particular, the following aspects shall be included on the staff training:* *(i) the environmental policy and action plan of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation;* *(ii) energy saving actions in relation to lights, air conditioning and heating systems when the staff leave the room or windows are opened;* *(iii) water saving actions in relation to leaks checking, watering, changes of sheets and towels frequency and backwashing pool procedure;* *(iv) chemical use minimisation actions in relation to chemical products for cleaning, dishwashing, sanitising, laundry and other special cleaners (e.g. swimming pool backwashing) which shall be used only where they are necessary; and if information on the dosage is available, the consumption limits of the mentioned products shall be those indicated on the packaging or recommended by the producer;* *(v) waste reduction and separation actions in relation to disposable items and disposal categories;* *(vi) environmentally preferable means of transport available to staff;* *(vii) according to criterion 3, the relevant information that staff is required to provide to guests.* *(b) Adequate training shall be provided to all new staff within 4 weeks of starting employment and an update on the above mentioned aspects for all other staff at least once a year.* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when. The dates and types of the staff training shall be recorded as evidence that this training update has taken place.*
Proposed criterion (GM2(m)) on staff engagement and training in TR1

(a) The tourist accommodation shall provide information and training to all staff (including subcontracted external staff), including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. Staff training shall cover the following aspects:
(i) the environmental policy and action programme of the accommodation and awareness of the EU Ecolabel;
(ii) energy saving actions (e.g. use of eco-cycles in dishwashers and washing machines, lights, air conditioning, heating, appliances);
(iii) water saving actions (e.g. use of eco-cycles in dishwashers and washing machines, leaks, sheet/towel changes, irrigation, pool procedures where relevant);
(iv) chemical use minimisation and optimal detergent dosages for laundry and dishwashing (based on water hardness and soiling), correct dilutions for concentrated cleaning products, etc.;
(v) waste reduction, separation and management of disposable items;
(vi) operational measures to reduce environmental impact in daily activities;
(vii) communication to guests on environmental practices and key behavioural messages (linked to GM3).
(b) ~~Adequate training shall be provided to all~~New staff shall receive training within 4 weeks of starting employment~~and an update on the above mentioned aspects for all other staff at least once a year~~. All staff shall receive refresher training at least annually.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and attendance and completion records. ~~an indication of which staff have received what training and when. The dates and types of the staff training shall be recorded as evidence that this training update has taken place.~~ Evidence of refresher training and updates on operational measures shall be included.

667

668 GM3 (m): Guest information and feedback

Existing requirements on guest information from Decision (EU) 2017/175
Criterion 3. Information to guests *(a)The tourist accommodation shall also provide information to the guests to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. That information shall be actively given to the guests in oral or written form at the reception or in-room and shall include, in particular, the following aspects:* *(i) environmental policy of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation;* *(ii) energy saving actions in relation to lights, air conditioning and heating systems when the guests leave the room or windows are opened;* *(iii) water saving actions in relation to leaks checking, and changes of sheets and towels frequency;* *(iv) waste reduction and separation actions in relation to disposable items, disposal categories and items that shall not be disposed of with the waste water. In addition, a poster or any other information material which would give advices to reduce food waste shall be displayed in the breakfast and dining rooms;* *(v) environmentally preferable means of transport available to guests;* *(vi) the tourist accommodation shall provide information to guests on available local touristic points of interest, local guides, local restaurants, markets, craft centres.* *(b) Guests shall be given a questionnaire, via internet or at premises, asking about their views on the general environmental aspects of the tourist accommodation listed in point (a) and their overall satisfaction with the facilities and services of the tourist accommodation. A clear procedure which records customer comments, complaints, replies given and corrective actions taken shall be in place.* *Assessment and verification:* *The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when. The*

dates and types of the staff training shall be recorded as evidence that this training update has taken place.

Proposed criterion (GM3(m)) on guest information and feedback in TR1

(a) The tourist accommodation shall also provide information to the guests to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. That information shall be actively given to the guests in oral or written form at the reception or in-room and shall include, in particular, the following aspects:

- ~~(i)~~environmental policy of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation;
- ~~(ii)~~energy saving actions in relation to lights, air conditioning and heating systems when the guests leave the room or windows are opened;
- ~~(iii)~~water saving actions in relation to leaks checking, and changes of sheets and towels frequency (less frequent than daily unless required by law, certification or particularly requested by the guest);
- ~~(iv)~~waste reduction and separation actions in relation to disposable items, disposal categories and items that shall not be disposed of with the wastewater. In addition, a poster or any other information material which would give advice~~s~~ to reduce food waste shall be displayed in the breakfast and dining rooms;
- ~~(v)~~environmentally preferable means of transport available to guests;
- ~~(vi)~~the tourist accommodation shall provide information to guests on available local touristic points of interest, local guides, local restaurants, markets, craft centres.

(b) Guests shall be given a questionnaire, via internet or at premises, asking about their views on the general environmental aspects of the tourist accommodation listed in point (a) and their overall satisfaction with the facilities and services of the tourist accommodation. A clear procedure which records customer comments, complaints, replies given and corrective actions taken shall be in place.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with copies of the information provided for the guests. The applicant shall indicate the procedures in place for distributing and collecting the information and the questionnaire, and for taking the feedback into account.

GM4 (o): EMAS registration, ISO certification of the tourist accommodation

Existing requirements on EMAS registration and ISO certification of the tourist accommodation from Decision (EU) 2017/175

Criterion 23. EMAS registration, ISO certification of the tourist accommodation
The tourist accommodation shall be registered under the eco-management and audit scheme (EMAS) of the Union (5 points) or certified according to ISO 14001 standard (3 points) or certified according to ISO 50001 standard (2 points).
Assessment and verification
The applicant shall provide appropriate evidence of EMAS registration or ISO certification(s).

Proposed criterion (GM4(o)) on EMAS registration, ISO certification of the tourist accommodation in TR1

The tourist accommodation shall be registered under the eco-management and audit scheme (EMAS) of the Union (2.5X points) or certified according to ISO 14001 standard (1.5X points) or certified according to ISO 50001 standard (X points).
Assessment and verification: The applicant shall provide appropriate evidence of EMAS registration or ISO certification(s).

GM5 (o): Consumption monitoring: Energy and water sub-metering

Existing requirements on consumption monitoring: energy and water sub-metering from Decision (EU) 2017/175
Criterion 27. Consumption monitoring: Energy and water sub-metering (up to 2 points) *The tourist accommodation shall have energy and water meters installed so as to allow data collection on consumption of different activities and/or machines, such as the following categories (1 point for each category, to a maximum of 2 points):* *(a) Rooms;* *(b) Pitches;* *(c) Laundry service;* *(d) Kitchen service;* *(e) Specific machines (e.g. refrigerators, washing machines).* *Assessment and verification* *The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with a map showing the places where meters are placed.*
Proposed criterion (GM5(o)) on consumption monitoring: energy and water sub-metering in TR1
The tourist accommodation shall have energy (electricity, gas or heat) and water sub-meters installed so as to allow targeted data collection on the consumption rates of different areas, services or equipment~~activities and/or machines~~, such as the following categories (1 point for each category, to a maximum of 2 points): (a) Guest ~~R~~rooms; (b) ~~Pitches;~~ (c) In-house ~~L~~laundry service; (d) In-house ~~K~~kitchen/restaurant service; (e) In-house leisure facilities, including swimming pools; (f) In-house event facilities (MICE); (g) Specific equipment or appliances~~machines~~ (e.g. refrigerators, washing machines, ovens etc.). Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with a map showing the places where sub-meters are placed.

Rationale for Theme 1

What do other EU Ecolabels say?: Relevant requirements in other ecolabel schemes, including the current EU Ecolabel criteria are compared in the table below.

Table 3. *Comparison of ecolabel schemes on requirements on general management*

Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
GM1(m): Management and governance	Related to O2 (appointment of a responsible person), O3 (general monitoring) and O4 (annual environmental targets).	Related to M01 on the management system and M02 on environmental performance monitoring and internal assessment	Related to 1.1 for appointing a responsible person, 1.2 regarding company policy, and 1.3 relating to annual targets.	Related to criteria from 1.1 to 1.5 and 1.12 on internal evaluation

Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
GM2(m): Staff engagement and training	Related to O7	Related to M04 on employee training	Related to 2.3, 2.4, 6.1 and 11.1.	Related to 1.6
GM3(m): Guest information and feedback	Customer complaints must be handled and documented (O6). Guest information is not presented as a sole criterion but embedded in certain criteria (e.g. O22 on prevention of eatable food waste).	Related to M05 on information to guests and M06 on information from guests	Related to 3.4, 3.5 and 3.7.	Related to 1.7 and 1.11
GM4(o): EMAS registration, ISO certification of the tourist accommodation	There are no requirements on the need for suppliers to have EMAS or ISO-certification but there are criteria on the purchasing of ecolabelled goods and services (O43).	Related to M25	No direct mention of these certificates, but 1.2 refers to a similar in-house version.	
GM5(o): EMAS registration, ISO certification of suppliers		Related to M26	Related to 13.5, on the "eco-certification" of suppliers.	

Source: As per the links in the header row of the table.

Regarding GM1 on management and governance, the proposal is a merging of the original criteria 1 (EMS) and 5 (consumption monitoring). The reason for merging is because the consumption monitoring provides the main KPIs that should be reported in the EMS. Therefore it is logical to have both aspects in a single criterion.

The written environmental policy now explicitly addresses energy, water, waste, and, where relevant, chemical use, ensuring applicability across operational contexts and covering all key environmental aspects of the accommodation.

The action programme is clarified to focus on measurable environmental targets. The flexibility to reference EMAS benchmarks or other recognised indicators where certain aspects are not addressed by the EU Ecolabel is maintained.

The internal evaluation process now includes regular collection of operational data on energy, water, waste, and chemical use, linking monitoring with corrective actions and ensuring verification of performance at least annually.

Regarding GM2, the proposed criterion largely maintains the structure of the existing requirement but clarifies and broadens its scope. Specific examples of energy-saving, water-saving and chemical use-minimisation measures have been added. Other points relating to operational measures and communication to guests have been added. The requirements on training records are broadly similar as before but have been rephrased for better clarity.

Regarding GM3, this criterion provides the basis for guest feedback and its incorporation into the internal evaluation process under GM1, creating a direct feedback loop between guest experience and organisational performance and supporting continuous improvement.

Transparency and participation are reinforced, as the environmental policy, action programme, and results of the yearly evaluation must be made available to staff and guests, fostering accountability and engagement in the accommodation's sustainability management.

Staff are required to communicate key environmental behaviours to guests, explicitly linking their training from GM2 to GM3. Annual refresher training ensures staff knowledge stays current and aligned with evolving environmental practices and guest feedback.

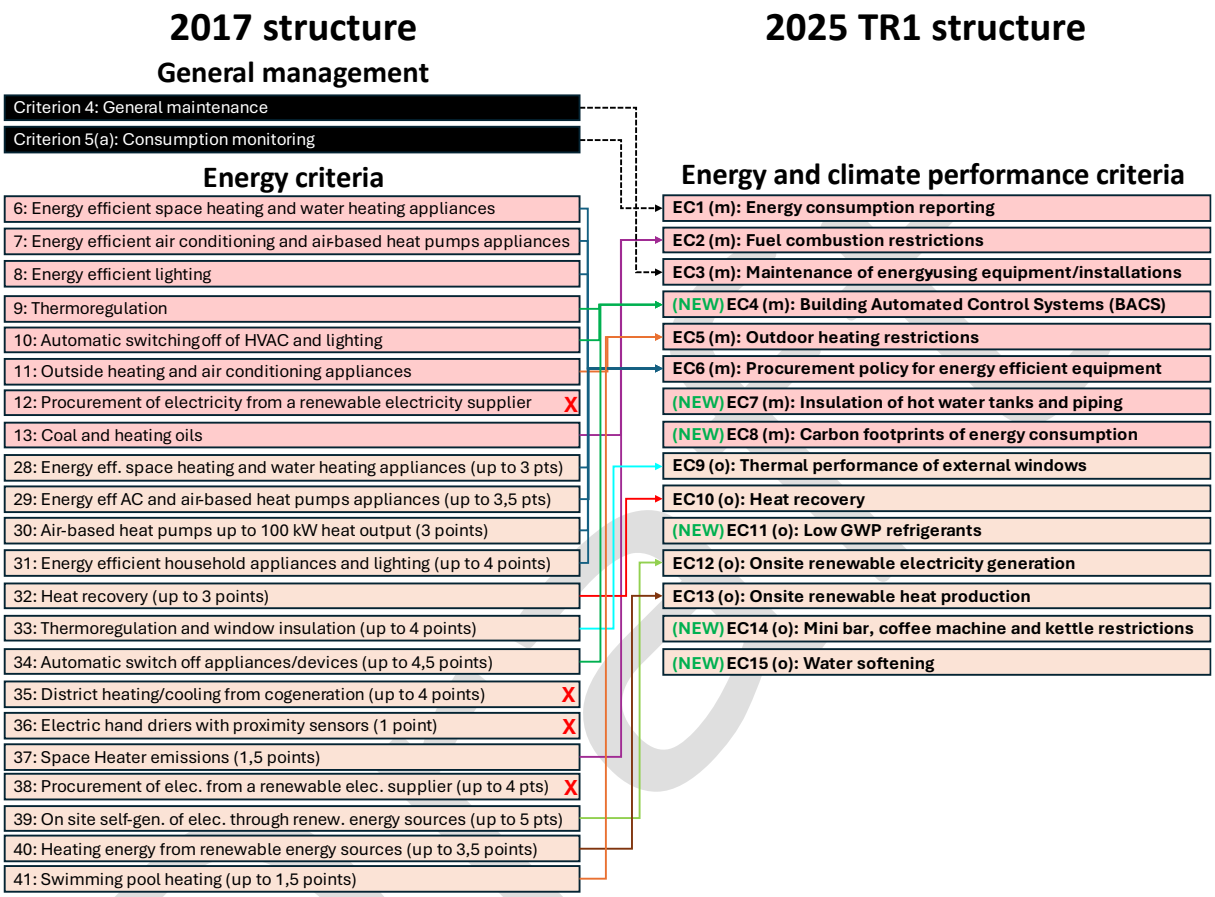
Regarding GM4, the criteria on the applicant being certified by EMAS, ISO 14001 are maintained without changes compared to the existing Decision. The highest allocation of points remains with EMAS due to its more comprehensive approach compared to the ISO standards. The ISO 14001 standard in turn has more points than the ISO 50001 standard. This is because the former standard extends to "environmental" aspects whereas the latter standard only focuses on energy. Comparable requirements are found in other schemes such as the Nordic Swan and the Austrian Ecolabel, where certification under EMAS or ISO standards are similarly recognised. The limited data from competent bodies confirmed that these requirements were being achieved in some campsites and hotels.

Regarding GM5, the basics of the original criteria are maintained, but have been tailored in some way to be more specific to Annex I type tourist accommodation establishments. This for example means the removal of the reference to "pitches" and the addition of the specific additional services that are mentioned in the proposed scope. It was also emphasised that the criterion is referring always to sub-metering. Six different options for points (1 point each) are listed but only a maximum of 2 points can be awarded. The reason for this is due to the fact that many establishments will simply not have the facilities that permit several of the options and they should not be negatively disadvantaged for this reason.

Theme 2: Energy and climate performance

A comparison of the individual criterion headings in the 2017 criteria and the TR1 proposals under the themes of "energy" and "energy and climate" are illustrated below.

Figure 6. Comparison of existing energy criteria with TR1 proposal



Source: Own elaboration.

Regarding criteria structure, there are seven fewer criteria in TR1 compared to the 2017 requirements. This is despite the fact only four criteria have been explicitly removed (12, 35, 36 and 38) and that three energy criteria which can be considered as completely new (EC7, EC14 and EC15) have been inserted. Furthermore, the theme has been extended to also include "climate" aspects (EC8 and EC11).

All criteria proposals in TR1 have been framed with the aim of reducing necessary technical details and facilitating the means of verification. One of the main simplifications has been the grouping of energy efficiency criteria for energy labelled products (numbers 6, 7, 8, 28, 29, 30 and 31) into a single TR1 criterion (EC8). This criterion sets a dynamic approach to energy class specifications which will not require amendment if the distribution of energy classes in the market evolves over time or even if the energy label implementing regulations change.

Requirements on the procurement of renewable electricity (numbers 12 and 38) have been removed due to concerns about their implementation in the real world and doubts about real benefits when considered a consequential effect perspective. Instead, focus is placed on onsite

renewable electricity generation and the installation of heating equipment that uses renewable energy sources (latent heat in ambient air/ground or the calorific value of biomass).

The criterion on district heating/cooling (number 35) has been removed because it is very location dependent and not an option in most places. The criterion on electric hand driers (number 36) has been removed due to its questionable actual benefit. The requirement on the allocation of renewable energy to swimming pool heating was seen as difficult to track, quantify and document. Instead of trying to allocate renewable energy to swimming pool heating, simpler all or nothing measures relating to outdoor swimming pool and hot tub heating in part of EC5 (which also deals with outdoor space heating).

Preliminary stakeholder questionnaire results showed that energy criteria were considered to be in most need of revision (see Task 1 section in the Background Report). This is partly the reason for the heavy revision of this theme, as illustrated above.

Regarding anonymised licence holder data, a review of points awarded to 43 different licences were provided by CBs. The table below presents an overview of where points were awarded and which optional energy criteria were being complied with. In cases where the uptake is less than 20% of the maximum possible, the cell is shaded red, if between 20% and 60%, it is shaded yellow, and if more than 60%, it is green.

Table 4. Points awarded to optional energy criteria in Decision (EU) 2017/175

	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. / Max.	With points	Avg. / Max.	With points	Avg. / Max.
28. Energy efficient heating appliances	9 of 20	1.78 /3	1 of 3	2 /3	10 of 20	1.3 /3
29. Energy eff. air conditioning and heat pumps	0 of 20	n/a	0 of 3	n/a	2 of 20	1.5 /3.5
30. Air-based heat pumps up to 100kW	0 of 20	n/a	0 of 3	n/a	0 of 20	n/a
31(a) Energy efficient refrigerating appliances	7 of 20	0.79 /1	0 of 3	n/a	4 of 20	0.63 /1
31(b) Energy efficient electric ovens	4 of 20	0.63 /1	0 of 3	n/a	5 of 20	0.7 /1
31(c) Energy efficient household dishwashers	5 of 20	0.8 /1	0 of 3	n/a	4 of 20	0.75 /1
31(d) Energy eff. household washing machines	6 of 20	0.83 /1	0 of 3	n/a	8 of 20	0.81 /1
31(e) Energy efficient office equipment	5 of 20	0.8 /1	1 of 3	0.5 /1	8 of 20	0.69 /1
31(f) Energy efficient household tumble driers	6 of 20	0.75 /1	0 of 3	n/a	6 of 20	0.75 /1
31(g) Energy eff. household vacuum cleaners	5 of 20	0.7 / 1	0 of 3	n/a	3 of 20	0.67 /1
31(h) Energy eff. Elec. lamps and luminaires	6 of 20	0.81 /1	0 of 3	n/a	12 of 20	0.83 /1
32. Heat recovery	9 of 20	1.5 /3	0 of 3	n/a	7 of 20	2.57 /3
33(a) Thermoregulation by guests	10 of 20	2 /2	1 of 3	2 /2	14 of 20	1.93 /2
33(b) Double glazing of windows	14 of 20	2 /2	3 of 3	2 /2	18 of 20	1.94 /2
34. Automatic switch-off	12 of 20	1.5/4.5	2 of 3	1.5/4.5	14 of 20	2.36/4.5
35(a) Energy efficient district heating/cooling	4 of 20	2 /2	0 of 3	n/a	2 of 20	2 /2
35(b) High energy efficiency cooling	0 of 20	n/a	0 of 3	n/a	1 of 20	2 /2
36. Electric hand driers	11 of 20	1 /1	0 of 3	n/a	4 of 20	1 /1
37. Space heater emissions	2 of 20	1.5/1.5	0 of 3	n/a	0 of 20	n/a
38(a) 100% renewable elec. procurement,	10 of 20	3.9 /4	0 of 3	n/a	11 of 20	4 /4
38(b) 100% renew. elec. procurement (GoO)	4 of 20	3 /3	1 of 3	3 /3	6 of 20	3 /3
39. Onsite renewable elec.	8 of 20	3.5 /5	2 of 3	4 /5	3 of 20	2.33 /5
40. Renewable heating	6 of 20	3 / 3.5	1 of 3	3.5/3.5	4 of 20	3.1/3.5
41. Swimming pool heating	0 of 20	n/a	0 of 3	n/a	1 of 20	1.5 /1.5
Average points awarded for energy		12.50		9.33		12.98

Source: Anonymised data provided by competent bodies

The data provided by competent bodies also included a distinction based on the nature of the tourist accommodation in line with the options that can be filtered on the EU Ecolabel tourist accommodation catalogue. The data could be split into hotels, cottages and campsites, which more or less aligns with the proposals for annexes I, II and III in TR1.

Insights are limited because the data provided (n=43) represents less than 5% of the total EU Ecolabel licenced tourist accommodation. The very low number of datasets for cottages (n=3) makes it difficult to draw any meaningful conclusion on that data. Focusing on campsites and hotels (each n=20), it was clear that the most frequently applied optional criteria were those relating to numbers 33 (both a and b), 34, 36 and 38. Two of these popular energy criteria (36 and 38) are proposed to be discontinued for reasons already stated further above.

A comparison of the TR1 proposals with any existing requirements in Decision (EU) 2017/175 is provided in the tables below.

EC1 (m): Energy consumption reporting

Existing requirement on energy consumption reporting from Decision (EU) 2017/175

No existing requirement under the theme of "Energy", but was part of criterion 5 on "General management"

Criterion 5. Consumption monitoring

The tourist accommodation shall have procedures for collecting and monitoring data monthly or, at least, yearly, on the following aspects as a minimum:

(a) specific energy use (kWh/guest night and/or kWh/m2 (of indoor area)year); [...]

Proposed criterion (EC1 (m)) on energy consumption reporting in TR1

The applicant shall report on metered energy consumption and estimates of bulk-delivered fuels with a monthly resolution and overall annual value according to the table below. Reported data shall cover all parts of the hotel that are related to tourist accommodation, but may exclude additional services such as restaurants, leisure facilities, and MICE if such data can be disaggregated.

Table X. Energy consumption reporting template for one year

Parameter	J	F	M	A	M	J	J	A	S	O	N	D	Year
Total metered electricity (kWh)													
Total metered natural gas (kWh)*													
Total metered heat/steam (kWh)*,**													
Total bulk delivered natural gas (kWh)*													
Total bulk delivered log wood (kWh)*													
Total bulk delivered wood pellets (kWh)*													
Total guest-nights													
Total room-nights													
Internal conditioned floor area (m2)***													
Specific electricity consumption (kWh/guest-night, /room-night, /m2)													
Specific fuel consumption (kWh/guest-night, /room-night, /m2)													
Specific energy consumption (kWh/guest-night, /room-night, /m2)													

*raw data will be in other units, therefore the choice of calorific values, bulk densities and any other factors for converting to kWh need to be explained in the monitoring report

**specifically relating to a distinct heating system

***refers to the internal floor areas that are served by HVAC systems. It should not include any floor areas dedicated to additional services - if energy consumption accounting for those services is deducted or otherwise disaggregated or excluded from the measurements.

Assessment and verification: The applicant shall provide a declaration of compliance, supported by a monitoring report that is based on records of meter readings taken as part of an in-house energy monitoring system. These records shall be supported by utility invoices, as appropriate, and provided upon request by the competent body.

With regards to bulk fuel consumption, the applicant shall keep records of fuel stocks each month and the combination of stock level changes and bulk fuel deliveries during the same month shall be used to estimate monthly bulk fuel consumption.
Energy consumed by additional services such as restaurants, MICE, leisure facilities, vehicle charging and in-house laundry can be deducted from the calculation if suitable sub-metering or assumptions with bulk fuel consumption are in place. The inclusion of any of these additional services in the energy consumption and floor area reporting must be clearly stated.
Electricity generated onsite from renewables or combined heat and power (CHP) units shall not be included in the calculations if it is self-consumed. The export of excess onsite electricity can be deducted if monitored via a separate meter or be automatically accounted for if it runs the main electricity supply meter backwards.

774

775 EC2 (m): Fuel combustion restrictions

Existing requirements on fuel combustion from Decision (EU) 2017/175

Criterion 13. Coal and heating oils

No heating oils having sulphur content higher than 0,1 % and no coal shall be used as an energy source. Note: This criterion only applies to tourist accommodations that have an independent heating system.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion, indicating the nature of the energy sources used. This shall be checked during the on-site visit.

Criterion 37. Space Heater emissions (1,5 points)

For space heaters in the tourist accommodation the nitrogen oxide (NOx) content of the exhaust gas shall not exceed the limit values indicated in the table below, calculated in accordance with the following acts:
(a) for gaseous and liquid fuel water-based space heaters, Commission Regulation (EU) No 813/2013 (27);
(b) for solid fuel water-based space heaters, Commission Regulation (EU) 2015/1189 (28);
(c) for gaseous and liquid fuel local space heaters, Regulation (EU) 2015/1188;
(d) for solid fuel local space heaters, Regulation (EU) 2015/1185.

Heat generator technology	*NOx emission limit*
Gas heaters	*For water-based heaters equipped with internal combustion engine: 240 mg/kWh GCV energy input* *For water-based and local heaters equipped with external combustion (boilers): 56 mg/kWh GCV energy input*
Liquid fuel heaters	*For water-based heaters equipped with internal combustion engine: 420 mg/kWh GCV energy input* *For water-based and local heaters equipped with external combustion (boilers): 120 mg/kWh GCV energy input*
Solid fuel heaters	*Water-based space heaters: 200 mg/Nm3 at 10 % O2* *Local space heaters: 200 mg/Nm3 at 13 % O2*

For solid fuel boilers and solid fuel local space heaters in the tourist accommodation, the emissions of particulate matter (PM) of the exhaust gas shall not exceed the limit values laid down in Regulation (EU) 2015/1189 and in Regulation (EU) 2015/1185, respectively.

Assessment and verification

The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the space heaters appliances indicating how the required efficiency is met. EU Ecolabel water-based heaters products shall be deemed to comply. Products bearing other ISO type I labels satisfying the above mentioned requirements shall be deemed to comply. Where EU Ecolabel water-based heaters products are used, the applicant shall provide a copy of the EU Ecolabel

certificate or a copy of the label on the package showing that it was awarded in accordance with Decision 2014/314/EU. Where products bearing other ISO type I labels are used, the applicant shall provide a copy of the type I label certificate a copy of the label on the package and indicate the ISO type I label requirements that match with the above mentioned requirements.

Proposed criterion (EC2 (m)) on fuel combustion in TR1
The tourist accommodation establishment shall not use solid- or liquid-based fossil fuels or peat for the generation or heat and/or power. Any boilers, local space heaters or CHP units that use solid biomass fuels (e.g. log wood, wood pellets, straw, olive stones etc.) shall be equipped with an electrostatic precipitator or similarly efficacious particulate emission abatement technology. Assessment and verification: The applicant shall provide a declaration of compliance, supported by a list and brief description of the boilers, combined heat and power units and local space heaters used in the tourist accommodation establishment. Descriptions shall include, as a minimum, the rated capacity (in kW), the manufacturer name, model name/number, and the type or types of fuel that can be used in the equipment. In cases, where solid- or liquid-based fossil fuels can technically be used by the biomass boilers or heaters, the applicant shall further declare on the explicit non-use of such fuels. In cases where solid biomass fuels are used, the description shall also include details of the exhaust gas abatement system.

776

777 EC3 (m): Maintenance of energy using equipment/installations

Existing requirements on maintenance from Decision (EU) 2017/175
Criterion 4. General maintenance *Preventative maintenance of appliances/devices shall be carried out at least yearly, or more often if required by law or relevant manufacturer's instructions. The maintenance shall include the inspection of possible leakage and assurance of the proper functioning at least for energy equipment (e.g. heating, ventilation and air conditioning (HVAC) appliances, refrigeration systems, etc.) and water equipment (e.g. plumbing fixtures, irrigation systems, etc.) at the accommodation premises.* *Appliances using refrigerants covered by the Regulation (EU) No 517/2014 of the European Parliament and of the Council (4), shall be inspected and maintained as follow:* *(a) for equipment that contains fluorinated greenhouse gases in quantities of 5 tonnes of CO2 equivalent or more, but of less than 50 tonnes of CO2 equivalent: at least every 12 months or, where a leakage detection system is installed, at least every 24 months;* *(b) for equipment that contains fluorinated greenhouse gases in quantities of 50 tonnes of CO2 equivalent or more, but of less than 500 tonnes of CO2 equivalent: at least every 6 months or, where a leakage detection system is installed, at least every 12 months;* *(c) for equipment that contains fluorinated greenhouse gases in quantities of 500 tonnes of CO2 equivalent or more: at least every 3 months or, where a leakage detection system is installed, at least every 6 months.* *All maintenance activities have to be registered in a specific maintenance register, specifying the approximate amounts of the water leaking from the water supply equipment.* *Assessment and verification* *The applicant shall provide a declaration of compliance, together with a brief description of the maintenance programme, details of the persons or companies carrying out the maintenance and the maintenance register.*

Proposed criterion (EC3 (m)) on maintenance of energy using equipment and installations in TR1
The applicant shall have a maintenance program for energy-using equipment and hot-water systems that consists of routine in-house measures and periodic checks conducted by qualified professionals. The routine in-house measures shall include, as a minimum: - Inspection and removal as necessary of grease build-up on kitchen extraction hood filters. - Door seal integrity on fridges and ovens. - Ice build-up in freezer units. - Correct functioning of any motion sensors for lighting. - Inspection of the condition of insulation for hot water tanks and hot water piping. - Checking for any leaks in hot water systems. - Guest room-mounted HVAC equipment (for example, inspection and cleaning of in-room filters, fans, condensate drains, coils etc.). The periodic measures (at least every 2 years) shall apply to centralised systems and include, as a minimum: - Air handling units of the ventilation system(s): for example, inspection of filters, heat exchangers/coils, fans/motors, dampers and airflow balance. - Chillers and cooling systems: for example condenser coil condition, evaporator performance, approach temperature and water flow. - Boilers and heating systems: for example, burner condition, heat exchanger condition, pump flow rates, seals, bearings and vibration, safety controls and flue gas analysis. - Ductwork: checking for leakage, insulation of heated or chilled sections. - Calibration of relevant sensors, such as flow meters, temperature, humidity, CO2 etc. - Electrostatic precipitator or any other exhaust gas abatement equipment from combustion installations. Specifically regarding refrigerants, the relevant requirements set out in Articles 4 to 8 of Regulation (EU) 2024/573 regarding F-gas emission prevention, leak checks, leakage detection systems, record-keeping and recovery and destruction shall be complied with for refrigeration equipment, air-conditioning equipment, heat pumps, fire protection equipment and electrical switchgear. These requirements and record keeping shall be incorporated into the maintenance plan. Any repair, replacement or maintenance interventions flagged by the checks and inspections must be acted upon by the management at the earliest practical opportunity. All maintenance activities have to be registered in a specific maintenance register~~, specifying the approximate amounts of the water leaking from the water supply equipment~~. Assessment and verification: The applicant shall provide a copy of the regular in-house inspection and maintenance program, which should identify each of the relevant inspection points in the establishment and maintain a record of any interventions made. Regarding periodic inspections and maintenance, the applicant shall keep copies of the inspection reports, maintain a record of any interventions made and keep track of refrigerant consumption/leakage. The program, inspection reports and record of interventions shall be provided to the competent body upon request.

778

779 EC4 (m): Building Automated Control System (BACS)

Existing requirements on BACS from Decision (EU) 2017/175
No direct requirements on BACS, but encompasses: *Criterion 9. Thermoregulation*

The temperature in every common area (for example restaurants, lounge areas, and conference rooms) shall be individually regulated within the following designated range:
(i) common area temperature set point, while in cooling mode, is set at or above 22 °C (+/– 2 °C on customers' request) for the duration of the summer;
(ii) common area temperature set point, while in heating mode, is set at or below 22 °C (+/– 2 °C on customers' request) for the duration of the winter.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion, together with documentation on the thermoregulatory systems or procedures followed to set the designated temperature ranges.

Criterion 10. Automatic switching off of HVAC and lighting

(a) HVAC systems/appliances installed within the duration of the EU Ecolabel licence shall be equipped with an automatic switch off when windows are opened and when guests leave the room.
(b) Automatic systems (e.g sensors, centralised key/card, etc.) which turn the all the lighting off when guests leave the room, shall be installed at construction and/or renovation of all new and/or renovated rental accommodations/guest rooms within the duration of the EU Ecolabel licence.
Note: Small accommodations (up to five rooms) are exempt.

Assessment and verification

The license holder have to inform the competent body about the new installation within the duration of the EU Ecolabel licence of automatic switching off of HVAC and lighting systems or devices and provide technical specifications from the professional technicians responsible for the installation or maintenance of these systems/devices.

Criterion 34. Automatic switch off of appliances/devices (up to 4,5 points)

(a) 90 % of the guest rooms in the tourist accommodation (rounded to the next integer) shall be equipped with an automatic switch off of installed HVAC systems when windows are opened and when guests leave the room (1,5 points);
(b) 90 % of the guest rooms in the tourist accommodation (rounded to the next integer) shall be equipped with an automatic system which turns the lights off when guests leave the room (1,5 points);
(c) 90 % of the outside lighting (rounded to the next integer) not needed for security reasons shall be turned off automatically after a defined time, or be activated through a proximity sensor (1,5 points).

Assessment and verification

The applicant shall provide technical specifications from the professional technicians responsible for the installation or maintenance of these appliances/devices.

Proposed criterion (EC4 (m)) on Building Automated Control Systems (BACS) in TR1

Centralised heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation (HVAC) shall be linked to a building automation and control system (BACS). The BACS shall provide:

- Central monitoring of energy consumption at building or subsystem level.
- Fault detection and diagnostics.
- Thermostatic and time-schedule control of heating and cooling.
- Occupancy-based control of HVAC and lighting in guest rooms
- Automatic optimisation of technical building systems.

Within the main hours of business activity, the temperature in communal areas shall be regulated to no lower than 23 ±3°C when outdoor temperatures exceed 26°C and to no higher than 21 ±3°C when outdoor temperatures are lower than 18°C.
Within guest rooms, temperature controls should enable a room air temperature to be maintained within the range of 18 to 26°C when windows are closed and guest controls are activated in the room.
Interior lighting in low-traffic communal areas shall be programmed to dim and/or switch off unless triggered by motion sensors.
Exterior lighting not needed for security reasons shall be programmed to switch-off during off-peak hours (for example 0000 to 0600). Such lighting may also be linked to motion sensors for switching on again.

Assessment and verification: The applicant shall provide a declaration of compliance, together with a brief description of the BACS, its functional capabilities and setup in the establishment, including the temperature setpoint logic. This applicant declaration shall be supported by a declaration of the BACS supplier or installer. A copy of technical documentation for the BACS shall be provided to the competent body on request.
If lighting controls are independent of the BACS, a separate declaration about interior and exterior lighting controls and off-peak switch-off programming shall be provided. The declaration shall include the identification of the areas and number of approximate number of interior and exterior light points covered by the lighting switch-off system.

780

781 EC5 (m): Outdoor heating restrictions

Existing requirements on outdoor heating from Decision (EU) 2017/175
Criterion 11. Outside heating and air conditioning appliances *No outside heating or air conditioning appliances shall be used by the tourist accommodation.* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion. This shall be checked during the on-site visit.* *Criterion 41. Swimming pool heating (up to 1,5 points)* *(a) At least 50 % of the total energy used to heat swimming pool water shall come from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC (1 point).* *(b) At least 95 % of the total energy used to heat swimming pool water shall come from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC (1,5 point).* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion, together with data on the energy consumed in heating swimming pool water and documentation showing the amount of energy used that comes from renewable energy sources.*
Proposed criterion (EC5 (m)) on outdoor heating in TR1
Outdoor air conditioning appliances shall not be used in the premises operated by the tourist accommodation enterprise. Outdoor space heating appliances shall not be used unless: - The heaters use infra-red radiant heating technology. - The heaters are situated in fully enclosable or partially enclosable* terraces or areas. - The heaters are only operated when the terraces are fully or partially enclosed*, when nearby areas are occupied, and when requested by occupants. - When the nearby area is unoccupied, the heaters and are either switched off or put into a reduced heat output mode. * partially enclosable/enclosed refers to an overhead roof enclosure plus at least 80% of the total floor to roof perimeter area. The heating of water in outdoor swimming pools or hot tubs shall not be permitted unless it uses direct solar radiation, geothermal heat or waste heat recovery as the heat sources. Assessment and verification: The applicant shall provide a declaration of compliance, which shall entail either a simple declaration of non-use, or details of the outdoor space heating set-up. In the latter case, a description of the outdoor heated area shall be provided, together with images of the area, the enclosure features, heater locations and product manuals for the heater units.

Regarding the heating of outdoor pools or hot tubs, the applicant shall provide a declaration of compliance. In cases of any heated outdoor pools or hot tubs, a brief description of the heating system used shall be provided. Technical documentation demonstrating that the outdoor pool/hot tub water is heated by direct solar radiation, geothermal energy or waste heat recovery shall be provided to the competent body upon request.

782

783 EC6 (m): Procurement policy for energy efficient equipment

Existing requirements relating to the procurement of energy efficient equipment from Decision (EU) 2017/175
Criterion 6. Energy efficient space heating and water heating appliances *[requirement not reproduced due to length]* *Criterion 7. Energy efficient air conditioning and air-based heat pumps appliances* *Household air conditioning and air-based heat pumps appliances installed within the duration of the EU Ecolabel licence shall have at least the following relevant energy classes as defined in Commission Delegated Regulation (EU) No 626/2011 (12):* *[...]* *Note: This criterion applies to electric mains-operated air conditioners and air-based heat pumps with a rated capacity of ≤ 12 kW for cooling, or heating, if the product has no cooling function. This criterion does not apply to appliances that use non-electric energy sources; and appliances of which the condenser — or evaporator — side, or both, do not use air for heat transfer medium.* *Assessment and verification* *The license holder shall inform the competent body about the new installation of the above mentioned appliances within the duration of the EU Ecolabel licence and provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the air conditioning system indicating how the required efficiency is met.* *Criterion 8. Energy efficient lighting* *(a) At the date of the EU Ecolabel licence award:* *(i) at least 40 % of all lighting in the tourist accommodation shall have at least Class A as determined in accordance with Annex VI to Commission Delegated Regulation (EU) No 874/2012 (13);* *(ii) at least 50 % of lighting that is situated where the lamps are likely to be turned on for more than 5 hours a day shall have at least Class A as determined in accordance with Annex VI to Delegated Regulation (EU) No 874/2012.* *(b) In maximum of 2 years from the date of the EU Ecolabel licence award:* *(i) at least 80 % of all lighting in the tourist accommodation shall have at least Class A as determined in accordance with Annex VI to Delegated Regulation (EU) No 874/2012;* *(ii) the 100 % of lighting that is situated where the lamps are likely to be turned on for more than 5 hours a day shall have at least Class A as determined in accordance with Annex VI to Delegated Regulation (EU) No 874/2012.* *Note: Percentages are set in reference to the total amount of light fittings suitable to use energy-saving lighting. The targets above do not apply to light fittings whose physical characteristics do not allow use of energy-saving lighting.* *Assessment and verification* *The applicant shall provide to the competent body written reports indicating the total amount of lamps and luminaires suitable to use energy-saving lighting, operating hours and amount of energy-saving lamps and luminaires with energy efficient light lamps and luminaires of at least Class A as determined in accordance with Annex VI to Delegated Regulation (EU) No 874/2012. The reports shall also include the explanation on the impossibility to substitute lamps and luminaires where physical characteristics do not allow use of*

energy-saving lamps and luminaires. Two reports shall be provided, a first one at the application date and a second one within a maximum of 2 years from the date of the award respectively.
The physical characteristics which may prevent the use of energy–saving light bulbs may include: decorative lighting requiring specialised lamps and luminaires; dimmable lighting; situations where energy-saving lighting may not be available. Where this is the case, evidence shall be provided to show why energy-saving lamps and luminaires can't be used. This may include, for example, photographic evidence of the type of lighting installed.

Criterion 28. Energy efficient space heating and water heating appliances (up to 3 points)
The tourist accommodation shall have at least:
(a) a water-based space heating appliance meeting criterion 6(a) (1 point);
(b) a local space heating appliance having at least the energy Class A as defined in Commission Delegated Regulation (EU) 2015/1186 (17) (1 point).
(c) a water heating appliance meeting criterion 6(c) (1 point).
Assessment and verification
The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the space and water heaters appliances indicating how the required efficiency required under criterion 6(a), (b) and (c) is met. EU Ecolabel water-based heaters products shall be deemed to comply with the requirement under criterion 6(a)(ii). Products bearing other ISO type I labels satisfying any of the requirements listed in criterion 6(a), (b) and (c) shall be deemed to comply. Where EU Ecolabel water-based heaters products are used, the applicant shall provide copy of the EU Ecolabel certificate or a copy of the label on the package showing that it was awarded in accordance with Decision 2014/314/EU. Where products bearing other ISO type I labels are used, the applicant shall provide a copy of the type I label certificate or a copy of the label on the package, and indicate the ISO type I label requirements that are listed in points (a), (b) and (c).

Criterion 29. Energy efficient air conditioning and air-based heat pumps appliances (up to 3,5 points)
The tourist accommodation shall comply with one of the thresholds:
(a) 50 % of household air conditioners or air-based heat pumps (rounded to the next integer) the energy efficiency of which is at least 15 % higher than the threshold set in criterion 7 (1,5 point);
(b) 50 % of household air conditioners or air-based heat pumps (rounded to the next integer) the energy efficiency of which is at least 30 % higher than the threshold set in criterion 7 (3,5 points).
Assessment and verification
The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the air conditioning system indicating how the required efficiency is met.

Criterion 30. Air-based heat pumps up to 100 kW heat output (3 points)
The tourist accommodation shall have at least an air-based heat pump meeting criterion 7 (if applicable, see note in criterion 7 and awarded the EU Ecolabel in accordance with Commission Decision 2007/742/EC (18) or other ISO Type I label.
Assessment and verification
The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the air-based heat pump indicating how the required efficiency is met (if applicable). Where EU Ecolabel heat pump products are used, the applicant shall provide a copy of the EU Ecolabel certificate or a copy of the label on the package showing that it was awarded in accordance with Decision 2007/742/EC. Where products bearing other ISO type I labels are used, the applicant shall provide a copy of the type I label certificate or a copy of the label on the package.

Criterion 31. Energy efficient household appliances and lighting (up to 4 points)
Tourist accommodation shall have energy efficient appliances for the following categories (0,5 point or 1 point each of the following categories, to a maximum of 4 points):

(a) household refrigerating appliances, of which at least 50 % (0,5 point) or 90 % (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Annex IX to Commission Delegated Regulation (EU) No 1060/2010 (19);
(b) household electric ovens, of which at least 50 % (0,5 point) or 90 % (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Annex I to Commission Delegated Regulation (EU) No 65/2014 (20);
(c) household dishwashers, of which at least 50 % (0,5 point) or 90 % (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Annex VI to Commission Delegated Regulation (EU) No 1059/2010 (21);
(d) household washing machines, of which at least 50 % (0,5 point) or 90 % (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Annex VI to Commission Delegated Regulation (EU) No 1061/2010 (22);
(e) office equipment of which at least 50 % (0,5 point) or 90 % (1 point) (rounded to the next integer) shall be ENERGY STAR qualified as defined by Energy Star v6.1 for computers and under the agreement set out in Commission Decision (EU) 2015/1402 (23), by Energy Star v6.0 for Displays, by Energy Star v2.0 for Imaging equipment, by Energy Star v1.0 for Uninterruptible power supplies and/or Energy Star v2.0 for Enterprise servers and under the agreement set out in Commission Decision 2014/202/EU (24).
(f) household tumble driers, of which at least 50 % (0,5 point) or 90 % (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A++ or better as laid down in Annex VI to Commission Delegated Regulation (EU) No 392/2012 (25);
(g) household vacuum cleaners, of which at least 50 % (0,5 point) or 90 % (1 point) (rounded to the next integer) shall be of EU Energy Label rated Class A or better as laid down in Annex I to Commission Delegated Regulation (EU) No 665/2013 (26);
(h) electrical lamps and luminaires, of which at least 50 % (0,5 point) or 90 % (1 point) shall be at least of Class A++ as laid down in Annex VI to Delegated Regulation (EU) No 874/2012.
Note: The criterion does not apply to appliances and lighting not covered by the Regulation mentioned for each category (e.g. industrial appliances).
Assessment and verification
The applicant shall provide documentation indicating the energy class (Energy Star certificate for category (e)) of all appliances for the applicable category.
lighting not covered by the Regulation mentioned for each category (e.g. industrial appliances).

Proposed criterion (EC6 (m)) on the procurement of energy efficient equipment in TR1

Note: this requirement only applies to the purchase of products that are within the scope of the energy labelling Regulation (EU) 2017/1369.

The applicant shall have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of energy efficient equipment listed below that is rated with EU energy classes that reflect the top 20% of related available products, as indicated in the EPREL database, at the time of purchase.

- Light sources.
- Professional refrigerated storage cabinets.
- Commercial refrigerators.
- Household, hotel and wine refrigerators.
- Electronic displays.
- Range hoods.
- Residential ventilation units.
- Air conditioners.
- Local space heaters.
- Solid fuel boilers.
- Water heaters.
- Dishwashers
- Washing machines

- Washer-dryers
- Household tumble dryers
- Domestic ovens.

Energy classes for the top 20% shall be considered by counting the distribution of energy classes for the relevant product group as listed on EPREL. If certain EPREL filters need to be applied to match the product characteristics being sought, the distribution of energy classes shall be based on the filtered data.
In both cases, counting shall start at the best energy class and work downwards, adding the % shares of each class until a total of 20% is achieved.
The procurement strategy shall apply the following logic, which will be influenced by the distribution of energy classes for a given product group:

- Select the energy classes that cover the top 15-25% of products.
- If the energy classes do not match up well, the energy classes permitted should be reduced so long as the top 10-15% of products are covered.
- If this is not possible, the energy class that potentially permits more than 25% of products shall be permitted, but award points will only be permitted to the higher energy classes than this lower permitted class.

Assessment and verification: The applicant shall provide a declaration of compliance, together with a copy of the relevant clause(s) in their procurement strategy. Examples of technical specifications and potential award criteria relating to energy performance shall be provided upon request by the competent body.
Records of actual purchases during the EU Ecolabel licence period of relevant energy using equipment from the list above shall be kept, noting the energy classes of each relevant product purchased. These records shall be shared with the competent body upon request.

784

785 EC7 (m): Insulation of hot water tanks and piping

Existing requirements on insulation of hot water tanks and piping from Decision (EU) 2017/175

No specific requirements, but indirectly covered by requirements on energy class labels and water heating efficiency in criterion 6(c)
[...]
(c) Water heating appliances installed within the duration of the EU Ecolabel licence shall have at least the following relevant energy efficiency indicators:

Water heater type	*Energy efficiency indicator*
All water heaters with a declared load profile ≤ S	*Energy class A ([b])*
All water heaters except heat pump water heaters, with a declared load profile > S and ≤ XXL	*Energy class A ([b])*
Heat pump water heaters with a declared load profile > S and ≤ XXL	*Energy class A+ ([b])*
All water heaters with a declared load profile > XXL (3XL and 4XL)	*Water heating energy efficiency ≥ 131 % ([c])*
(b) As defined in Annex II to Commission Delegated Regulation (EU) No 812/2013 (1). *(c) As defined in Annex VI to Commission Regulation (EU) No 814/2013 (2).*	

[...]

Proposed criterion (EC7 (m)) on insulation of hot water tanks and piping in TR1

Note: this requirement should also be applied to any additional services, such as restaurants or leisure facilities.

Any hot water storage tanks in the tourist accommodation establishment shall be insulated to ensure a standing heat loss of ≤ 0.8 W/L according to EN 12897.
At least 90% of hot water pipe lengths shall be covered with insulation achieving a minimum thermal resistance (R-value) of 1.0 m^2.k/W.

Assessment and verification: The applicant shall provide a declaration of compliance, supported by a description of the hot water supply and distribution system for establishment. The description shall include:

- any hot water storage tanks, their dimensions, the tank material and any internal lining, the external insulation material, its thickness and standard thermal properties.
- an estimate of hot water pipe lengths, diameters, the pipe material and any internal lining, the extent of pipe lengths that are insulated, the external insulation material used, its thickness and standard thermal properties.

The applicant shall provide basic calculations, including approximate temperature gradients if needed, to estimate the thermal insulation performance of the hot water tanks and insulated hot water pipes.
If several different types of tank/insulation and pip/insulation combinations are present, the calculation only needs to be provided for the worst-case tank and insulated pipe length.

786

787 EC8 (m): Carbon footprint of energy consumption

Existing requirements on carbon footprint from Decision (EU) 2017/175
No existing requirements.
Proposed criterion (EC8 (m)) on carbon footprint in TR1
Note: the underlying data for this criterion may be available already via reporting under EC1 and reporting on refrigerant charges under EC3. Energy consumption in the tourist accommodation establishment shall be expressed in terms of carbon footprint by using one of the following approaches: - In-house calculated carbon footprint according to the freely available Hotel Carbon Management Initiative (HCMI). - Third-party certified scope 1 and scope 2 emissions according to the GHG protocol. The scope of the calculation shall be clearly defined in terms of whether energy use for restaurants, MICE, laundry (in-house or outsourced) and leisure centres is included or not. Results shall be expressed in absolute emissions, and emissions that are normalised per guest-night, per room-night and per m2 of internal conditioned floor area. Assessment and verification: The applicant shall provide a declaration of compliance, supported by a copy of a completed assessment, together with the ingoing input data used for the calculation.

788

789 EC9 (o): Thermal performance of external windows

Existing requirements on thermal performance of external windows from Decision (EU) 2017/175
Criterion 33. Thermoregulation and window insulation (up to 4 points) *[...]*

(b) 90 % of windows in heated and/or air conditioned rooms and common areas shall be insulated with at least double glazing or equivalent (2 points).

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the thermoregulatory systems or procedures followed to set the designated temperature ranges or windows pictures. An expert declaration shall be provided in case that window insulation equivalent to multiple glazing is used.

Proposed criterion (EC9 (o)) on thermal performance of external windows in TR1

Note: points will be awarded in proportion to the % of external window areas that meet the requirements.

The thermal transmittance (U-value) of external windows or glazed curtain walling shall be 1.5 W/m^2.K or lower (X points).

Guest-room windows subject to direct solar glare shall be equipped with full shutter blinds (X points).

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a summary of the total external window area (a), split into guest room windows (b) and communal area external windows (c) and glazed curtain walling (d).

The applicant shall further declare on the types of window product or glazing units used, stating the product name, model (if relevant) and supplier. The external areas that correspond to each window or glazing unit type shall be estimated (b, c and d).

For each product the applicant shall provide a copy of the product data sheet or declaration of performance and conformity, indicating the relevant U-value. In cases of custom installation where the U-value is uncertain, the installer or product supplier shall provide a supporting declaration.

For all external guest room windows (b), the applicant shall count the estimated window area for each unit and note: (b1) if it is subject to direct solar glare, and (b2) if it is served by a full shutter blind. The total area counted under (b2) shall be divided by the total area counted under (b1) to determine the extent of compliance with this part of the optional requirement. External windows that are not subject to direct solar glare but which have full shutter blinds are not counted in this calculation.

790

791 ## EC10 (o): Heat recovery

Existing requirements relating to heat recovery from Decision (EU) 2017/175

Criterion 32. Heat recovery (up to 3 points)

The tourist accommodation shall have a heat recovery system for one (1,5 point) or two (3 points) of the following categories: refrigeration systems, ventilators, washing machines, dishwashers, swimming pools, and sanitary waste water.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion, together with documentation on the heat recovery systems (e.g. copy of the project of the heat recovery systems in place, description from a technician, etc.).

Proposed criterion (EC10 (o)) on heat recovery in TR1

Note: A maximum of 3X points can be awarded via this criterion. Points awarded under the first and second items shall be in proportion to the share of guest rooms which are served by such devices.

The tourist accommodation establishment shall have ~~a~~ heat recovery system(s) in place to reduce space heating or water heating energy demand. The following heat recovery systems shall be recognised:

- Drain water heat recovery (DWHR) from shower/bath drain water and transfer to the cold-water inlet pipe in guest rooms (X points).
- Mechanical ventilation heat recovery (MVHR) from ventilation exhaust gas and transfer to inlet air (X points).
- Heat recovery from refrigeration units, dishwasher effluent and washing machine effluent to heat inlet water for laundry, swimming pool or general hot water supply (X points).

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance with one, two or all three types of heat recovery. Points awarded under the first point shall be proportional to the number of guest rooms with the heat recovery devices installed.
The applicant shall provide a brief description of the locations of the heat recovery devices, their manufacturer/supplier and model number(s). If directly incorporated into the centralised system, the part of the system technical manual that presents the heat recovery device shall be highlighted. The whole technical manual of heat recovery systems shall be provided to the competent body on request.

792

793 EC11 (o): Low GWP refrigerants

Existing requirements relating to low GWP refrigerants from Decision (EU) 2017/175

Criterion 6. Energy efficient space heating and water heating appliances
(a) Water-based space heating appliances installed within the duration of the EU Ecolabel licence shall:
(i) be a high efficiency cogeneration unit as defined by Directive 2012/27/EU of the European Parliament and of the Council (6), or
(ii) have seasonal space heating energy efficiency and/or GHG emission limits in accordance with the values in the following tables, calculated as stated in Commission Decision 2014/314/EU (7):

Water-based space heater type	Efficiency indicator
All space heating appliances except solid biomass boiler heaters and heat pump heaters	*Minimum Seasonal Space Heating Energy Efficiency* (η_s) ≥ 98 %
Solid biomass boiler heaters	*Minimum Seasonal Space Heating Energy Efficiency* (η_s) ≥ 79 %
Heat pump heaters (two options are valid for heat pumps using refrigerants with GWP ≤ 2 000 , option 2 is mandatory for heat pumps using refrigerants with GWP ≤ 2 000)	**Option 1** — *Minimum Seasonal Space Energy Heating Efficiency* / refrigerant GWP values
	η_s ≥ 107 %/[0-500]
	η_s ≥ 110 %/(500-1 000]
	η_s ≥ 120 %/(1 000 -2 000]
	η_s ≥ 130 %/> 2 000
	Option 2 — *GHG emission limits*
	150 g CO_2-equivalent/kWh heating output

[...]

Proposed criterion (EC11 (o)) on low GWP refrigerants in TR1

Note: A maximum of X points can be awarded under this criterion. Points will be awarded in proportion to the share of low GWP or very low GWP refrigerants (on a % mass or volume basis) used in the heat pump and air conditioning systems.

Refrigerants used in the tourist accommodation establishment are:
- Low GWP refrigerants (GWP < 150) (up to 0.5X points).

- Very low GWP refrigerants (GWP < 10) (up to X points).

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide an inventory of the current refrigerant charges (quantities) currently estimated to be present in the tourist accommodation establishment. The technical name, shorthand chemical name, CAS number and associated GWP value shall be provided for each refrigerant.
Based on this information, the applicant shall provide an approximate estimation of the total % shares of low GWP and very low GWP refrigerants in use.

794

795 EC12 (o): Onsite renewable electricity generation

Existing requirements relating to onsite renewable electricity generation from Decision (EU) 2017/175
Criterion 5. Consumption monitoring *The tourist accommodation shall have procedures for collecting and monitoring data monthly or, at least, yearly, on the following aspects as a minimum:* *[...]* *(b) percentage of final energy use met by renewable energy generated on site (%);* *[...]* *Criterion 39. On site self-generation of electricity through renewable energy sources (up to 5 points)* *The tourist accommodation shall have on site electricity generation from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC, which may include: photovoltaic (solar panel) or local hydroelectric system, geothermal, local biomass or wind power electricity generation that generates:* *(a) at least 10 % of the overall electricity consumption per year (1 point);* *(b) at least 20 % of the overall electricity consumption per year (3 points);* *(c) at least 50 % of the overall electricity consumption per year (5 points).* *For the purposes of this criterion, local biomass is considered to be biomass from a source located within a 160 kilometres radius of the tourist accommodation.* *If the self-generation of renewable electricity leads to the issuing of guarantees of origin, the self-generation can only be taken into account if the guarantees of origin do not end up on the market, but are cancelled to cover the local consumption.* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion, together with documentation on the photovoltaic, hydroelectric, geothermal, biomass or wind power system and data on its actual output. In case local biomass is used, applicant shall provide evidence of the local availability of biomass (e.g. biomass supplier contract). In addition, where a hydroelectric system is used, the applicant shall provide a valid permit/authorisation/concession in line with applicable national laws and regulations. The calculation of the % generated of the overall consumption of the previous year to the application can be used to demonstrate the capacity to fulfil this criterion.*
Proposed criterion (EC12 (o)) on onsite renewable electricity generation in TR1
Note: A minimum of 0.2X points and a maximum of X points shall be awarded under this criterion. Points will be awarded in proportion to the where the exact share of self-consumed onsite (generated) renewable electricity (SCORE) lies in between the 10% and 50% thresholds. The scope of reporting should ideally match to the scope of the monitoring system implemented under EC1 and ideally use data that is automatically logged by the BACS in EC4.

Considering the overall annual data, the share of SCORE shall be at least 10% of total electricity consumption.

$$Annual\ SCORE = \sum_{n=1}^{12} \frac{monthly\ SCORE_n}{monthly\ SCORE_n + purchased\ electricity_n}$$

Maximum points shall be awarded when onsite renewable electricity accounts for an effective 50% of consumption.

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance, supported by monthly data for:

- Onsite generated renewable electricity (in kWh or MWh), split into self-consumed (SCORE) and exported fractions.
- Purchased electricity (in kWh or MWh).

An annual calculation of onsite generated renewable electricity and purchased electricity consumption, based on the sums of relevant monthly data, shall also be provided.

Biomass combustion can only be counted as contributing to "onsite generated renewable electricity" if it is used in onsite CHP units. In this case, only the electricity output shall be counted, not the thermal output.

796

797 EC13 (o): Onsite renewable heat production onsite

Existing requirements relating to onsite renewable heat production from Decision (EU) 2017/175
Criterion 5. Consumption monitoring *The tourist accommodation shall have procedures for collecting and monitoring data monthly or, at least, yearly, on the following aspects as a minimum:* *[...]* *(b) percentage of final energy use met by renewable energy generated on site (%);* *[...]* *Criterion 40. Heating energy from renewable energy sources (up to 3,5 points)* *(a) At least 70 % of the total energy used to heat or cool the rooms (1,5 points) and/or to heat sanitary water (1 point) shall come from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC.* *(b) 100 % of the total energy used to heat or cool the rooms (2 points) and/or to heat sanitary water (1,5 points) shall come from renewable energy sources as defined in Article 2(a) of Directive 2009/28/EC.* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion, together with data on energy consumed and documentation showing that at least 70 % or 100 % of this energy comes from renewable energy sources.*
Proposed criterion (EC13 (o)) on onsite renewable heat production in TR1
Note: A minimum of 0.1X points and a maximum of X points can be awarded under this criterion. Points will be awarded in proportion to the share of total heat production capacity (MW) from onsite installed renewable systems and equipment. The scope of the calculation should be limited to guest rooms and communal areas, without including additional services such as restaurants, MICE and leisure facilities. However, in cases where it is not possible to distinguish due to centralised systems, the applicant shall declare the full scope of the calculation.

At least ~~70%~~10% of the total installed thermal capacity ~~energy~~ of equipment and systems used to heat or cool indoor spaces~~areas the rooms (1.5 points)~~ and~~/or~~ to heat sanitary water ~~(1 point)~~ shall be based on renewable energy sources.

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a description of the centralised and local space heating and water heating equipment and systems and the parts of the tourist accommodation establishment that they cover.
Sources such as solar thermal for water heating, geothermal-based heat pumps, aerothermal (or ambient energy)-based heat pumps, biomass space heaters, biomass boilers and biomass CHP units shall be counted as sources of 100% renewable heat production. However, with biomass CHP, only the heat output rating shall be counted. The installed capacities (in kW or MW) of the renewable heat producing systems and equipment shall be summed up.
A similar calculation shall be made for natural gas-based heating systems and equipment, plus fully electric power-based heating/cooling systems and equipment.
The share of renewable heat shall be calculated as the installed renewables capacity divided by the total (renewable, natural gas and fully electric) installed capacity.

798

799 EC14 (o): Mini-bar, coffee machine and kettle restrictions

Existing requirements relating to mini bar restrictions from Decision (EU) 2017/175
No existing requirement.
Proposed criterion (EC13 (o)) on mini bar restrictions in TR1
Note: A minimum of 0.1X points and a maximum of X points can be awarded under this criterion. Points will be awarded in proportion to the share of guest rooms without a mini bar. At least 10% of the guest rooms shall have no mini bar, coffee machine or kettle. Alternative means of the convenient procurement of snacks, drinks, coffee or hot water for tea by guests may be provided via vending machines (maxi-bar concept) located in communal areas near guest rooms. Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of the extent of use of mini bars, coffee machine and kettles in guest rooms.

800

801 EC15 (o): Water softening

Existing requirements relating to water softening from Decision (EU) 2017/175
No existing requirement.
Proposed criterion (EC17 (o)) on water softening in TR1
A total of X points shall be awarded if the water supply to the tourist accommodation establishment has a water hardness of less than 110 mg/L CaCO3 eq. (which also equates to around 6 °dH (German degrees)). If the water supply has a hardness of ≥110 mg/L CaCO3 eq., X points shall be awarded if the water supply sent to hot water systems is softened by ion exchange to a level of 60 mg/L CaCO3 eq. or less.

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance by either:

- Making a claim on the average hardness of the supplied water being less than 110 mg/L CaCO3 eq., supported by in-house testing or a declaration from the water supplier.
- If supplied water is ≥110 mg/L CaCO3 eq., then a description of the hot water supply and recirculation system(s) shall be provided, including where the ion exchange systems is installed, the hardness levels before and after softening, and the commitment to regenerating the ion exchange resin when needed.

Rationale for theme 2: energy

Regarding EC1, the monitoring of energy consumption (fuel and electricity) is a crucial aspect of any efforts to maintain good performance or understand where improvements can be made. The previous criteria in Decision (EU) 2017/175 appear to only apply to electricity and do not clearly state whether additional services are to be included or excluded. Benchmarking in the tourist accommodation sector is a major challenge due to the influence of additional services and centralised technical systems which may serve both the core and the additional activities. Occupancy levels can also impact the metrics to one extent or another depending on the functional unit chosen (e.g. absolute consumption or per guest-night, per room-night or per m2 conditioned internal floor area). A summary of the data collected from existing EU Ecolabel licence holders is provided in Annex 2 to this report, together with an analysis of data from the Cornell Hotel Sustainability Benchmark (CHSB) initiative. The high spread of data in those analyses emphasises the need for better clarity about the scope of energy consumption monitoring.

Regarding EC2, the same restriction on combustion of fossil fuels is maintained with the exception of natural gas, which is now permitted. The main reasons for this are: (i) natural gas combustion is much cleaner in terms of pollutant emissions than other fuels (see table below), and (ii) peak demand for hot water in hotels is very acute and any electrified system would require a very large hot water storage capacity and/or place additional strain on peak demand.

Table 5. Comparison of emissions from the combustion of different fuels

Emission (g/GJ)	Coal	Fuel oil	Natural gas	Log wood	Wood pellets
CO2	94600 (fossil)	77400 (fossil)	56100 (fossil)	112000 (biogenic)	112000 (biogenic)
NOx (as NO2)	150-300	100-150	30-60	80-150	50-100
PM10	150-400	10-50	< 1	200-400	10-30
PM2.5	100-300	5-40	< 1	150-350	5-20
CO	50-150	5-30	1 to 5	1500-3000	50-300

Sources: EMEP (EEA);IPCC,, UK government fuel combustion emission inventory guidance.

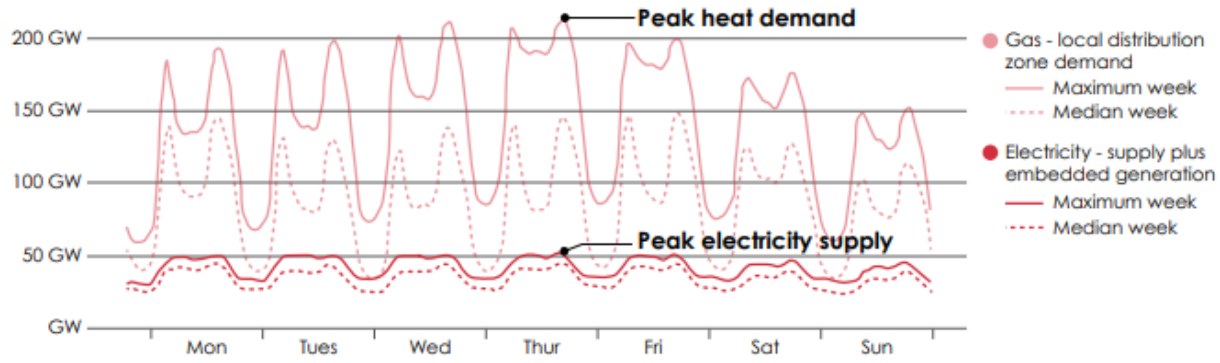
Considering the relative importance of PM emission impacts in the LCA screening results from Tasks 4 and 5, there is a reasonable argument to permit the use of natural gas as a fuel.

Biomass combustion is also permitted, but only under the condition that abatement equipment has been installed that will reduce PM emissions. Electrostatic precipitators (ESPs) are a proven technology for reducing PM emissions by over 90% so long as they are correctly sized and maintained. They can also be retrofitted to most existing biomass combustion units. The criterion

does not exclusively require ESP installation, but leaves room for potential alternatives such as glass fibre filter bags or combined set-ups which also include cyclonic separators.

At the systemic level, as other policies drive the electrification of heating systems, the gap between peak demand and electrical grid capacity will only increase. Weekday mornings peaks are due a common wake-up time for a large portion of the population and the switching on of lights, boiling water for coffee/tea and toasters or oven hobs for breakfast. A shift away from natural gas-based water heating to electric water heating further exacerbates this existing peak when considering morning showers. At national level, the situation can be like shown below.

Figure 7. Local gas demand vs electricity supply in winter 2017/2018 in the UK.



Source: LETI, 2019. London Energy Transformation Initiative: Climate Emergency Design Guide

Consequently, the proposed EU Ecolabel criteria regarding fuel combustion do not apply oblige a shift to electric heating technologies, but leave room for the continued use of natural has and the conditional use of solid biomass fuels. It should also be understood that biogas and bioliquid fuels are also permitted, but these are not explicitly mentioned due to their niche positions.

Regarding EC3, this criterion includes requirements for maintenance of energy using equipment, including the appropriate handling of refrigerants. The new EC3 proposal is similar in intention but is completely reworded to include more specific measures to be included. The measures are also split into more regular measures that most staff could carry out and other requirements which require qualified professionals, who may be employees or contractors.

Regarding EC4, the requirement to introduce a BACS is new, but what the BACS is required to do is very similar to what was previously requested in criteria 9, 10 and 34. This relates to regulating the indoor temperatures and logic for the automatic switching off of energy using equipment to avoid unnecessary energy consumption. The reason for pushing for BACS in the Annex I proposal is that such systems are already required under Article 13 of the recast EPBD for non-residential buildings with a combined effective rated HVAC output of over 290 kW when HVAC systems are being installed, replaced or upgraded. Many large hotels will already fall within this category. Furthermore, by 2030, the threshold for this requirement with drop to an effective rated HVAC output of 70 kW.

Regarding EC5, the ban on outdoor heating in the 2017 criteria has been replaced by a conditional restriction. Outdoor heating typically results in substantial energy waste because conventional gas or convective heaters warm large volumes of air rather than the occupants themselves. Allowing only infrared radiant heating ensures that energy is directed efficiently to people and surfaces rather than lost to the environment. Infrared systems deliver focused heat with far lower losses and can provide the same comfort at significantly lower power ratings. When combined with a

requirement that the outdoor space be partially enclosed or enclosable, wind-driven heat loss and convective dissipation are dramatically reduced, ensuring that outdoor heating is used only where heat retention is feasible. This measure provides meaningful energy savings while still allowing hotels to make use of terraces and outdoor seating areas.

With outdoor pools and hot tubs, heating is only permitted in the exclusive cases of the use of fully renewable or waste heat sources.

Regarding EC6, this proposal represents a major simplification of the criteria. Instead of the highly technical and nuanced approaches to the specifications of energy classes, a horizontal logic is applied to all relevant products listed on EPREL. Targeting the top 15-25% of products based on EPREL energy classes ensures that new appliances entering the building stock deliver significantly lower energy consumption over their lifetime. This approach reflects market dynamics, and procurement decisions at this stage avoid locking hotels into inefficient equipment for a decade or more.

It was necessary to try and specify different approaches to energy class specifications because the actual distributions of energy classes can complicate efforts to target the top 15-25% of products. To illustrate this better, some hypothetical examples are provided below. On the left hand side of the figure below is an example of where groups of energy classes actually land within the 15 to 25% range. In the middle, is an example of where this is not the case, but where the stricter approach would work. Finally, on the right hand side, is an example of where the less ambitious approach would need to be applied, but with award points to make the more efficient products more competitive than the energy class D products.

Figure 8. Hypothetical examples of how to apply criterion EC6 when energy class distributions vary.

Example where 15-25% target lines up (specific classes A to C = top 17.5%)	Example where stricter approach would work (specific classes A to B = top 11.1%)	Example where less ambitious approach would be needed (specific classes A to D = top 46.0% *award points for A to C = top 7.5%)	
0.2% of products (0.2% cumulative)	0.2% of products (0.2% cumulative)	0.2% of products (0.2% cumulative)*	A
1.4% of products (1.6% cumulative)	10.9% of products (11.1% cumulative)	1.4% of products (1.6% cumulative)*	B
15.9% of products (17.5% cumulative)	24.9% of products (36.0% cumulative)	5.9% of products (7.5% cumulative)*	C
23.5% of products (41.0% cumulative)	13.5% of products (49.5% cumulative)	38.5% of products (46.0% cumulative)	D
35.6% of products (76.6% cumulative)	35.6% of products (85.1% cumulative)	35.6% of products (81.6% cumulative)	E
22.1% of products (98.7% cumulative)	14.9% of products (100.0% cumulative)	12.1% of products (93.7% cumulative)	F
1.3% of products (100.0% cumulative)	0.0% of products (100.0% cumulative)	6.3% of products (100.0% cumulative)	G

Source: Own elaboration

Compared to the 2017 criteria, one specific simplification that was achieved by this criterion is the approach to energy efficient light sources. According to stakeholder feedback, the requirements to have a minimum of X% of light fittings complying with certain energy classes was impractical to implement due to the very high number of individual light fittings and uncertainties about how to count them all (i.e. what was 100%). Determining the energy class of existing light sources was also a challenge and the requirements in Decision (EU) 2017/175 encouraged the premature

replacement of light sources, which contradicts circular economy principles, unless the unwanted, but still functional, light sources are donated.

Requiring a formal procurement strategy also aligns with best practices in sustainable purchasing, enabling consistency across managers and procurement cycles. Using EPREL ensures comparability and transparency, while allowing technical feasibility filters maintains flexibility for hotels with specific operational needs. Overall, this criterion provides a high impact with relatively low administrative burden.

Regarding EC7, the mandatory requirement to insulate hot water tanks and piping is apparently new in the TR1 proposals, but may have been indirectly required via this text in the annex preamble of Decision (EU) 2017/175: "*The physical structure respects Union, national and local laws and regulations regarding energy efficiency and thermal insulation, water sources, [...]*". However, such a requirement is not explicit and subject to different requirements in different Member States.

Insulating hot-water storage tanks and distribution pipes is one of the most cost-effective and reliable ways to reduce energy consumption in hotels. Without proper insulation, storage losses and distribution losses can account for a significant share of total domestic hot water energy use—particularly in buildings with long pipe runs, recirculation loops, or high standby temperatures. A relatively small investment in high-quality insulation (typically 40–80 mm for tanks and 20–40 mm for pipes) can drastically reduce heat losses, lowering both fuel consumption and operating costs.

For a hotel, where hot water demand is continuous and predictable, insulation contributes directly to greater system efficiency, improved guest comfort, and reduced peak load on boilers or heat pumps. It also reduces wear on equipment by minimising reheating cycles and prevents unnecessary overheating in technical rooms. Because insulation performance is easy to assess visually during ecolabel audits, this criterion provides a high-impact, low-complexity intervention with guaranteed energy and emissions reductions.

Regarding EC8, this is a new requirement in the TR1 proposal. It mandates simplified reporting on carbon emissions enables executives and decision-makers in the tourist accommodation sector to see the net effect of efforts to improve energy efficiency, shift towards renewable energy sources and to lower GWP refrigerants, all in a single metric. Simplified reporting avoids the need for costly carbon footprint assessments by independent third parties, but still focuses on the major contributors to carbon footprint that can be controlled by management decisions (i.e. electricity consumption, electricity source, fuel combustion and refrigerant leakage). These requirements also aim to align with a broadly implemented initiative for which a free tool is available (the Hotel Carbon Measurement Initiative, or HCMI[12]).

Regarding EC9, the requirement is similar to that of part (b) of criterion 33 in Decision (EU) 2017/175. However, the new requirement is different in the sense that a clear pass/fail quantitative limit is defined and by referring to the U-value, the thermal performance of not just the glass itself in windows is specified, but also the frame. The requirement for shuttering blinds is also new.

External windows are a major source of heat loss and solar gain in hotels, where maintaining stable indoor temperatures is critical for guest comfort. Setting a U-value threshold of 1.5 W/m^2·K ensures

[12] See here for more details about HCMI: https://sustainablehospitalityalliance.org/resource/hotel-carbon-measurement-initiative/

that only energy-efficient glazing is used, reducing heating demand in colder seasons and lowering peak loads on HVAC systems. This level is easily achievable with modern low-E double glazing, representing a cost-effective balance between performance and feasibility across diverse European climates. Because window performance is well documented in CE declarations, verification is straightforward.

Guest-room comfort is also strongly influenced by solar glare, particularly in sun-exposed rooms. Requiring full shutter blinds improves thermal and visual comfort while reducing unnecessary cooling loads. Together, these measures yield predictable energy savings and improve the overall environmental and comfort performance of the accommodation.

Regarding EC10, this requirement is similar to criterion 32 in Decision (EU) 2017/175 but is broken down into three points which are more detailed. Heat recovery systems capture energy that would otherwise be lost—via drain water, ventilation exhaust air, or warm effluents from kitchen or laundry operations—and return it to useful service. In hotels, these sources represent some of the most consistent and predictable streams of low-grade heat.

Heat-recovery technologies used in tourist accommodation—specifically drain-water heat recovery (DWHR), mechanical ventilation heat recovery (MVHR/HRV), and recovery from refrigeration or laundry effluents—deliver substantial and well-documented reductions in energy demand. Empirical studies from ASHRAE[13] and field evaluations by Natural Resources Canada[14] show that vertical DWHR units typically recover 20–40% of usable heat from shower wastewater, depending on flow balancing and device configuration. This is especially important in trying to shave the weekday morning peak hot water demand in hotels.

For ventilation systems, EN 308 test data and supporting guidance from CIBSE Guide B2[15] confirm that high-efficiency counterflow or rotary heat exchangers achieve sensible heat-recovery efficiencies of 50–80%, which translate into similar reductions in ventilation heating loads.

Additional opportunities exist in commercial laundries, dishwashing and refrigeration: industrial manufacturers such as Meiko[16], Winterhalter, Jensen, and Kannegiesser, document typical energy savings in the range of 20–50% when condenser heat reclaim or wastewater heat-recovery modules are installed.

Collectively, these results demonstrate that heat-recovery measures provide major reductions in thermal energy demand, making them highly suitable for inclusion in ecolabel performance criteria. Encouraging hotels to implement one or more heat-recovery technologies supports long-term reductions in energy demand, especially for domestic hot water, which represents a substantial

[13] See the ASHRAE Handbook – HVAC Applications, specifically the Service Water Heating Chapter.

[14] See NRCan DWHR Performance Reports, available here: https://natural-resources.canada.ca

[15] See CIBSE Guide B2 on ventilation and ductwork, available here: https://www.cibse.org/knowledge-research/knowledge-portal/guide-b2-ventilation-and-ductwork-2016, and standard EN 308 on Heat exchangers - Test procedures for establishing performance of air to air heat recovery components.

[16] For example see Figure 15 in the Lot 24 preparatory report on professional dishwashers. Available here: https://www.energimyndigheten.se/4a9851/globalassets/energieffektivisering_/jag-ar-saljare-eller-tillverkare/dokument/produkter-med-krav/tvatt--och-diskmaskiner-torktumlare-professionella/eup_lot24_wash_t5_report_ener_clean.pdf

share of total energy use in accommodation facilities. Because these systems are installed in fixed physical locations and supported by technical manuals, verification is practical and transparent.

Regarding EC11, the requirements relating to refrigerants are now much more clearly stated. The previous requirement in criterion 6 of Decision (EU) 2017/175 linked GWP ranges for refrigerants to mandatory minimum energy efficiencies for heat pumps. Instead, an optional approach to the use of low and very low GWP refrigerants is proposed.

Refrigerant leakage is a very important source of scope 1 greenhouse gas emissions in hotels, particularly those with multiple VRF/VRV or split heat-pump systems. Conventional HFC refrigerants can have GWPs in the range of 1,300–2,000, meaning even small leaks create disproportionate climate impacts. Transitioning to low-GWP (<150) or very low-GWP (<10) refrigerants dramatically reduces this risk and aligns with the EU F-gas Regulation, which is already steering the refrigeration and HVAC market toward climate-friendly alternatives such as R290, R600a, CO_2 (R744), or R32 in some cases.

This criterion encourages proactive adoption of future-proof technologies, reducing lifecycle emissions while improving compliance readiness. Because refrigerant charges must already be documented for safety and maintenance purposes, calculating the share of low-GWP refrigerants is straightforward and auditable.

Regarding EC12, on the onsite generation of renewable electricity, this is a continuation of the existing approach set out in criterion 39 of Decision (EU) 2017/175. For practical reasons, the results are to be expressed as self-consumption divided by total consumption. Any excess renewable electricity (e.g. during low occupation periods) may be exported by running the purchased electricity meter backwards or be diverted to onsite energy storage. In both cases, the excess onsite renewable electricity would be indirectly accounted for via the reduced demand for purchased electricity. Depending on the scope of the accounting system and associated metering of electricity, the transfer of excess renewable electricity to additional services should be treated as SCORE or as an indirect reduction in purchased electricity.

Onsite renewable electricity generation is vital because it reduces dependence on grid electricity, reduces energy bills and simultaneously lowers the carbon footprint of hotel operations. Hotels often have substantial roof or façade areas suitable for PV installation, and their daytime electricity use aligns well with solar generation profiles. Rewarding onsite generation proportionally encourages continuous improvement rather than a binary “yes/no” threshold. Because hotels already track monthly electricity consumption under EC1, integrating onsite generation into the ecolabel scheme should require minimal additional reporting.

Regarding EC13, on the onsite generation of heat energy from renewable sources, this is a continuation of the existing approach set out in criterion 40 of Decision (EU) 2017/175. Heating and cooling represent a major share of energy consumption in hotels. Shifting to renewable heat sources—such as heat pumps using ambient or geothermal energy, biomass boilers, or solar thermal collectors—significantly reduces carbon emissions and often lowers operating costs. Considering the installed capacity share allows the criterion to reflect the structural, long-term investment choices made by the accommodation, rather than annual consumption variations affected by climate or occupancy.

Using installed thermal capacity as the basis for calculation is practical for hotels with centralised or hybrid heating systems and makes verification straightforward through technical documentation. It also incentivises installations that displace fossil-fuel heating capacity, supporting decarbonisation of the building stock in line with the EPBD and national policies.

Regarding EC14, the restriction on mini-bars, coffee machines and kettles is a new proposal. At the level of the entire tourist accommodation electricity consumption from mini-bars can be significant when considering their total number. They typically operate 24/7 regardless of occupancy, and many older units may have poor energy performance. Reducing the number of mini-bars decreases unnecessary refrigeration energy demand while maintaining guest convenience through shared vending options or communal service points.

With coffee machines and kettles for teamaking, these items may be misused by guests or require periodic maintenance which is less time- and cost-efficient due to the number of items involved. Such appliances will run of tap water from the guest room, which may be hard enough to create problems with scale formation. Centralised vending machines, on the other hand, are well engineered to optimise water heating, carry out self-cleaning operations, apply self-diagnostics to flag technical issues and are generally optimised for dealing with water hardness (e.g. built-in ion exchangers).

This criterion encourages hotels to rethink guest-room amenities in favour of more energy-efficient, centralised solutions. Because verifying the presence or absence of mini-bars is simple and easily audited, this is a low-burden, high-impact measure suitable for an ecolabel's optional scoring system.

Regarding EC15, a new requirement on water softening is inserted due to the potential importance of this issue in many different geographies across the EU. Hard water causes limescale build-up in boilers, heat exchangers, and hot-water circuits, which significantly reduces heat-transfer efficiency and increases energy consumption. Even a 1–2 mm layer of scale can increase fuel use by 10–15%, and in very hard-water regions efficiency losses may exceed 20–30%. As scale thickness increases, fuel use continues to increase. Eventually, excessive scaling will lead to a premature end of life of components of the water heating system[17]. Ensuring either naturally soft water (<110 mg/L $CaCO_3$) or effective softening to ≤60 mg/L $CaCO_3$ protects system efficiency, reduces maintenance costs, and improves equipment longevity.

Ion-exchange softening is a well-established, reliable method for preventing scale formation and is easily verifiable through hardness testing. Because DHW generation is a major energy load in hotels, this criterion directly contributes to reducing operational energy demand and supports long-term system performance.

What do other EU Ecolabels say?: Relevant requirements in other ecolabel schemes, including the current EU Ecolabel criteria are compared in the table below. Due to the high number of criteria being compared, the comparison is presented in a matrix format.

Table 6. Comparison of ecolabel schemes on requirements to report energy consumption

Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
EC1(m): Energy consumption reporting	O9 requires reporting of purchased energy	Related to part (a) of M13	Related to 7.1 and 7.23.	Related to 2.1 and 2.4.

[17] For example, see the CIBSE CPD presentation by Sentinel Commerical, available here: https://www.cibse.org/media/m2sleiwf/water-treatment-in-commercial-heating-and-dhw-systems-presentation.pdf

Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
	(fuel and electricity consumption)			
EC2(m): Fuel combustion restrictions	O8 Fossil fuel restricts natural gas too, with cooking and "top load" exceptions.	E07. Natural gas is permitted until 2040.	Related to 7.15. No natural gas allowed.	NA
EC3(m): Maintenance of energy-using equipment	Partly related to 11th point in O12.	Related to E03.	Related to 7.4, 7.5, 7.6, 7.7,	Related to 2.6, part of 2.14 and 3.5.
EC4(m): Building automation / demand control	O11 and part of O12 refer to "demand controlled" and "demand driven" measures.		Related to 7.2, 7.9, 7.10, 7.21, 7.22 and 7.24.	Partly related to first point of 2.11 and all of 2.12.
EC5(m): Outdoor heating restrictions	Partly by 4th point on O11, allowed if "demand driven".	E10 bans outdoor heating.	Related to 7.28.	
EC6(m): Efficient procurement of EE equipment		Related to E04, E06 and E09a.	Related to 7.3, 7.11 and 7.18.	Related to 2.3 and part of 2.14.
EC7(m): Insulation of hot water tanks/pipes		Related to E05.		Related to 2.13.
EC8(m): Carbon footprint of energy	Related to the last point in O12.	Related to E14a.		
EC9(o): Thermal performance of external windows		Related to E02.	Related to 7.17.	Related to part of 2.5 and 4th point of 2.11.
EC10(o): Heat recovery	Related to 9th point in O12.		Related to 7.25.	Related to 2.13.
EC11(o): Low GWP refrigerants				
EC12(o): On-site renewable electricity	Partly covered by the 3rd point in O12.		Related to 7.13 and 7.14.	Both related to 2.9.
EC13(o): On-site renewable heat				
EC14(o): Minibar restrictions			Related to 7.16.	Related to 5th and 6th points of 2.11.
EC15(o): Water softening				Related to part of 2.14 and 3.7.

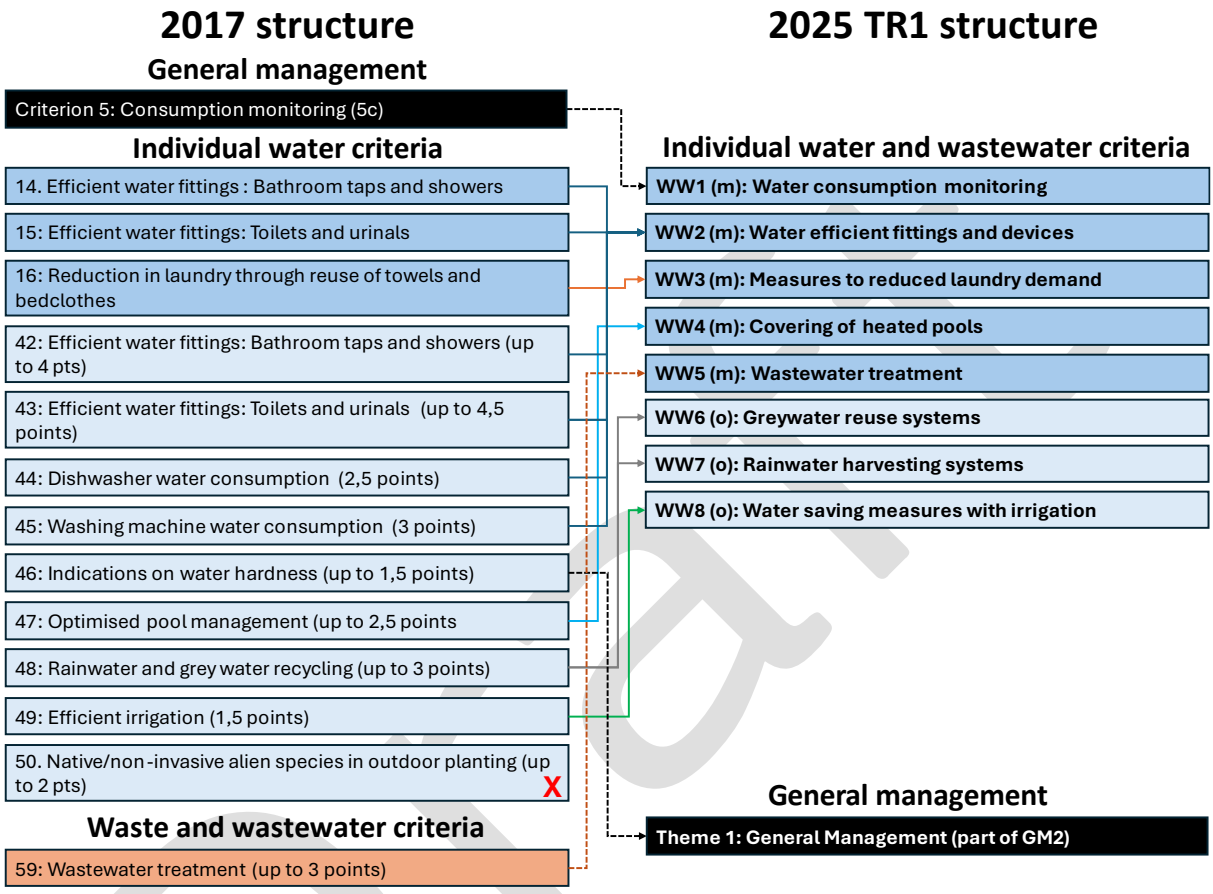
Source: As per the links in the header row of the table.

As shown in the table above, almost all of the proposals in TR1 for EU Ecolabel criteria have some relation to requirements in one or more of the other four main ecolabels operating in the EU. The only completely new requirement is the one relating to the use of low-GWP or very low-GWP refrigerants. This is also new in the sense that this is more focused on climate change objectives rather than energy consumption.

Theme 3: Water and wastewater

A comparison of the individual criterion headings in the 2017 criteria and the TR1 proposals under the theme of "waste and wastewater" is illustrated below.

Figure 9. Comparison of existing water criteria with TR1 proposal



Source: Own elaboration.

Regarding criteria structure, there are four fewer criteria in TR1 compared to the 2017 requirements. Only one criterion has been explicitly removed (No. 50). The main reason for removal was due to the assumed lack of accurate information and databases about the boundaries of when a plant species becomes native or alien across Europe and if all alien species are to be considered as invasive or not.

Another criterion on information about water hardness was effectively removed (No. 46). The main purpose of this requirement is to reduce detergent dosages, so it seems most appropriate that this should belong in staff training under GM2. There is also a much more impactful new optional criterion on actual water softening under EC15.

Criteria relating to efficient fittings and appliances (Nos. 14, 15, 42, 43, 44 and 45) have been condensed in a single criterion (WW2) that is closely aligned with the corresponding EU Taxonomy criteria for buildings. The water consumption requirements in WW2 that relate to washing machines and dishwashers are based on information that would appear on a mandatory energy label. To

ensure coherence, the requirement is linked to appliances in the scope of the Energy Labelling Regulation ([18]).

Existing criterion 48 has been split into two new criteria (WW5 and WW6) so that more detailed approaches can be made for greywater and rainwater systems. Two criteria originated from other sections come into this theme (criteria 5c) and 59 becoming WW1 and WW5, respectively).

Regarding anonymised licence holder data, a review of points awarded to 43 different licences were provided by CBs. The table below presents an overview of where points were awarded and which optional energy criteria were being complied with. In cases where the uptake is less than 20% of the maximum possible, the cell is shaded red, if between 20% and 60%, it is shaded yellow, and if more than 60%, it is green.

Table 7. Points awarded to optional "water" criteria in Decision (EU) 2017/175

	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. / Max.	With points	Avg. / Max.	With points	Avg. / Max.
42a): Efficient bathroom taps and showers	8 of 20	2/2	2 of 3	2/2	13 of 20	1.85/2
42b): >50% Ecolabelled bathroom taps/showers	0 of 20	n/a	0 of 3	n/a	0 of 20	n/a
43a): Waterless urinals	2 of 20	1.5/1.5	0 of 3	n/a	0 of 20	n/a
43b): >50% ecolabelled urinals	1 of 20	1.5/1.5	0 of 3	n/a	1 of 20	1.5/1.5
43c): >50% ecolabelled toilets	2 of 20	1.5/1.5	1 of 3	1.5/1.5	0 of 20	n/a
44: Dishwasher water consumption	5 of 20	2.5/2.5	1 of 3	2.5/2.5	6 of 20	2.5/2.5
45: Washing machine water consumption	12 of 20	3/3	1 of 3	3/3	6 of 20	3/3
46a): Indications on water hardness near washing machines and/or dishwashers	14 of 20	0.5/0.5	1 of 3	0.5/0.5	8 of 20	0.5/0.5
46b): Automated dosing systems that adapt based on water hardness	5 of 20	1.5/1.5	1 of 3	1.5/1.5	11 of 20	1.5/1.5
47a): Covering of pools and whirlpools	4 of 20	1/1	0 of 3	n/a	4 of 20	0.75/1
47b): Optimal chlorine dosing for disinfection	9 of 20	0.83/1.5	1 of 3	1.5/1.5	4 of 20	0.75/1.5
48i): Grey water from laundry/showers/sinks	1 of 20	1/1	1 of 3	1/1	0 of 20	n/a
48ii): Rainwater harvesting	9 of 20	1/1	1 of 3	1/1	7 of 20	1/1
48iii): Recovery of condensate from HVAC	1 of 20	1/1	0 of 3	n/a	0 of 20	n/a
49a): Optimised procedure for efficient irrigation	7 of 20	1.5/1.5	0 of 3	n/a	7 of 20	1.5/1.5
49b): Automated system for optimised irrigation	5 of 20	1.5/1.5	2 of 3	1.5/1.5	4 of 20	1.5/1.5
50i): Absence of invasive alien species of EU concern	9 of 20	0.5/0.5	0 of 3	n/a	5 of 20	0.5/0.5
50ii): Exclusively non-invasive alien species	3 of 20	1/1	0 of 3	n/a	2 of 20	0.75/1
50iii): Native and non-invasive alien species	4 of 20	1.5/1.5	1 of 3	1.5/1.5	9 of 20	1.39/1.5
50iv): Exclusively native species	4 of 20	2/2	2 of 3	2/2	5 of 20	1.7/2
59a): Car-wash drainage	2 of 20	1/1	0 of 3	n/a	2 of 20	1/1
59b): Wastewater treatment	1 of 20	2/2	0 of 3	n/a	1 of 20	2/2
Average points awarded for water		7.45		8.00		6.68

Source: Anonymised data provided by competent bodies

The data provided by competent bodies also included a distinction based on the nature of the tourist accommodation in line with the options that can be filtered on the EU Ecolabel tourist accommodation catalogue ([19]). The data could be split into hotels, cottages and campsites, which more or less aligns with the proposals for annexes I, II and III in TR1.

[18] More information on the Energy Labelling Regulation is available at this link.

[19] The EU Ecolabel tourist accommodation catalogue can be found here at this link.

Insights are limited because the data provided (n=43) represents less than 5% of the total EU Ecolabel licenced tourist accommodation. The very low number of datasets for cottages (n=3) makes it difficult to draw any meaningful conclusion on that data. Focusing on campsites and hotels (each n=20), it was clear that the uptake of ecolabelled fittings (see 42b), 43b) and 43c)) was very low (2-3 out of 43) or zero. The use of water efficient dishwashers and washing machines in criteria 44 and 55 was much more frequent (12 and 19 out of 43).

When comparing alternative water sources, the uptake of HVAC condensate recovery (1 of 43) and grey water reuse (2 of 43) were much lower than rainwater harvesting (17 of 43) in criterion 48. Similar levels of uptake were also noted for efficient irrigation measures (criterion 49) and the choice of species (criterion 50).

A comparison of the TR1 proposals with any existing requirements in Decision (EU) 2017/175 is provided in the tables below.

WW1 (m): Water consumption monitoring

Existing requirement on water consumption monitoring from Decision (EU) 2017/175
No existing requirement under the theme of "Water", but was part of criterion 5 on "General management" *Criterion 5. Consumption monitoring* *The tourist accommodation shall have procedures for collecting and monitoring data monthly or, at least, yearly, on the following aspects as a minimum:* *[...]* *(c) water consumption per guest-night (litres/guest-night) including the water used for irrigation (if applicable) and any other activities related to water consumption;* *[...]*

Proposed criterion (WW1 (m)) on water consumption monitoring in TR1
The applicant shall report on metered water consumption with a monthly resolution and overall annual value according to the table below. Reported data shall cover all parts of the hotel that are related to tourist accommodation, but shall separately report consumption by additional services such as restaurants, leisure facilities, and MICE. All cold water systems and related sanitary fittings shall be regularly inspected by in-house staff for leaks and repair measures taken as needed.

Table X. Water consumption reporting template for one year

Parameter	J	F	M	A	M	J	J	A	S	O	N	D	Year
Total metered mains water (m3)													
Total metered abstracted water (m3)*													
Sub-metered supply to kitchen/restaurant (m3)													
Sub-metered supply to in-house laundry (m3)													
Sub-metered supply to leisure facilities (m3)													
Sub-metered supply to MICE (m3)													
Sub-metered supply to irrigation systems (m3)													
Total guest-nights													
Total room-nights													
Specific total water consumption (L/guest-night, /room-night)													
Specific accommodation-related consumption (L/guest-night, /room-night)													
Specific in-house laundry-related consumption (L/guest-night, /room-night)													

Specific leisure facility-related consumption (L/guest-night, /room-night)													

*abstracted water refers to the private and legal supply of water from local groundwater tables or surface water bodies supplied directly to the tourist accommodation establishment.

Monitoring does not extend to flows in greywater circuits, rainwater harvesting systems or recirculation loops in HVAC or heat recovery systems.

Assessment and verification: The applicant shall provide a declaration of compliance, supported by a monitoring report that is based on records of meter readings taken as part of an in-house water monitoring system. These records shall be supported by utility invoices, as appropriate, and provided upon request by the competent body.
Water consumed by additional services such as restaurants, in-house laundry, leisure facilities, MICE and irrigation can be deducted from the calculation is suitable sub-metering is in place. The inclusion of any of these additional services in the water consumption reporting must be clearly stated.

1099

1100 WW2 (m): Water efficient fittings and devices

Existing requirement on water efficient fittings and devices (in Decision (EU) 2017/175)
Criterion 14. Efficient water fittings: Bathroom taps and showers *Without prejudice to the local or national regulation on water flow rate from bathroom taps and showers, the average water flow rate of the bathroom taps and showers shall not exceed 8,5 litres/minute.* *Note: bathtubs, rainshowers and massage-showers are exempt.* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion, and relevant documentation, including an explanation on how the tourist accommodation fulfils the criterion (e.g. use of flowmeter or small bucket and a watch). EU Ecolabel sanitary tapware products or products bearing other ISO type I labels satisfying the above mentioned requirements will be deemed to comply. Where EU Ecolabel sanitary tapware products are used, the applicant shall provide copy of the EU Ecolabel certificate or a copy of the label on the package showing that it was awarded in accordance with Commission Decision 2013/250/EU (15). Where other type I label products are used, the applicant shall provide a copy of the ISO type I label certificate or a copy of the label on the package and indicate the ISO type I label requirements that are like the ones mentioned above.* *Criterion 15. Efficient water fittings: toilets and urinals* *Without prejudice to the local or national regulation on toilets and urinals flushing, (a) Continuous flushing is not permitted in any urinal at the accommodation. (b) Toilets installed within the duration of the EU Ecolabel licence shall have effective toilet flush of ≤ 4,5 L* *Assessment and verification:* *The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion together with appropriate supporting documentation. For requirement (b) the license holder shall inform the competent body about the new installation within the duration of the EU Ecolabel licence of toilets together with appropriate supporting documentation. EU Ecolabel flushing toilets and urinals products or another ISO type I label toilets and urinals satisfying the above mentioned requirements shall be deemed to comply. Where EU Ecolabel toilets and urinals products are used, the applicant shall provide copy of the EU Ecolabel certificate or a copy of the label on the package showing that it was awarded in accordance with Commission Decision 2013/641/EU (2).Where products bearing other ISO type I labels are used, the applicant shall provide a copy of the type I label certificate or a copy of the label on the package and indicate the ISO type I label requirements that are like the ones mentioned above.* *Criterion 42. Efficient water fittings: Bathroom taps and showers (up to 4 points)*

(a) The average water flow rate of the showers shall not exceed 7 litres/min and bathroom taps (except bathtubs) shall not exceed 6 litres/minute (2 points).
(b) At least 50 % of the bathroom taps and shower (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Decision 2013/250/EU or another ISO type I label (2 points).

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion, and relevant documentation, including an explanation on how the tourist accommodation fulfils the criterion (e.g. use of flowmeter or small bucket and a watch). EU Ecolabel sanitary tapware products and products bearing other ISO type I labels, satisfying the above mentioned requirements, shall be deemed to comply. Where EU Ecolabel sanitary tapware products are used, the applicant shall provide a copy of the EU Ecolabel certificate or a copy of the label on the package showing that it was awarded in accordance with Decision 2013/250/EU. Where other type I label products are used, the applicant shall provide a copy of the ISO type I label certificate or a copy of the label on the package

Criterion 43. Efficient water fittings: Toilets and urinals (up to 4,5 points)

(a) All urinals shall use a waterless system (1,5 point).
(b) At least 50 % of urinals (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Decision 2013/641/EU or another ISO type I label (1,5 point).
(c) At least 50 % of toilets (rounded to the next integer) shall have been awarded the EU ecolabel in accordance with Decision 2013/641/EU or another ISO type I label (1,5 point).

Assessment and verification

The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation. EU Ecolabel flushing toilets and urinals products or products bearing other ISO type I labels satisfying the above mentioned requirements shall be deemed to comply. Where EU Ecolabel flushing toilets and urinals products are used, the applicant shall provide copy of the EU Ecolabel certificate or a copy of the label on the package showing that it was awarded in accordance with Decision 2013/641/EU. Where products bearing other ISO type I labels are used, the applicant shall provide a copy of the type I label certificate or a copy of the label on the package.

Criterion 44. Dishwasher water consumption (2,5 points)

The water consumption of the dishwashers shall be lower or equal to the threshold as laid down in the following table, measured according to the standard EN 50242, using the standard cleaning cycle:

Product sub-group	*Water consumption (Wt) (litres/cycle)*
Household dishwashers with 15 place settings	*10*
Household dishwashers with 14 place settings	*10*
Household dishwashers with 13 place settings	*10*
Household dishwashers with 12 place settings	*9*
Household dishwashers with 9 place settings	*9*
Household dishwashers with 6 place settings	*7*
Household dishwashers with 4 place settings	*9,5*

Note: The criterion only applies to household dishwashers covered by Commission Regulation (EU) No 1016/2010 (29).

Assessment and verification

The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the dishwashers. 280 total number of standard cleaning cycles per year shall be assumed in the case that only annual consumption is provided.

Criterion 45. Washing machine water consumption (3 points)

The washing machines used within the tourist accommodation by guests and staff or those used by the tourist accommodation laundry service provider shall fulfil at least one of the following requirements:
(a) for household washing machines, their water consumption is lower or equal to the threshold as defined in the following table, measured according to the standard EN 60456, using the standard washing cycle (60 °C cotton program):

Product sub-group	*Water consumption: (litres/cycle)*
Household washing machines with a rated capacity of 3 kg	*39*
Household washing machines with a rated capacity of 3,5 kg	*39*
Household washing machines with a rated capacity of 4,5 kg	*40*
Household washing machines with a rated capacity of 5 kg	*39*

Household washing machines with a rated capacity of 6 kg	*37*
Household washing machines with a rated capacity of 7 kg	*43*
Household washing machines with a rated capacity of 8 kg	*56*

(b) for commercial or professional washing machines, they have an average laundry water consumption of ≤ 7 l per kg of laundry washed.

Note: point (a) only applies to household washing machines covered by Commission Regulation (EU) No 1015/2010 (30).

Assessment and verification

The applicant shall provide technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the washing machines. For the purposes of showing compliance with point (a), 220 total number of standard cleaning cycles per year shall be assumed in the case that only annual consumption is provided.

Proposed criterion (WW2(m)): Water efficient fittings and devices

Note: in cases where the tourist accommodation establishment is located in a river basin subjected to severe seasonal water stress, this requirement shall be mandatory for installed fittings, devices and appliances at the time of award of the EU Ecolabel award, not only for newly procured fittings, devices and appliances.

Without prejudice to ~~the~~ local or national regulations, the specified water use for all newly procured and installed water fittings and devices shall be compliant with the following values:

a) Wash hand basin taps in guest rooms, staff facilities, leisure facilities and public toilets shall have a maximum water flow of 6 litres/min;
b) Kitchen taps in exclusive guest areas shall have a maximum water flow of 6 litres/min;
c) Showers in guest rooms, staff facilities and leisure facilities shall have a maximum water flow of 8 litres/min;
d) WCs, including suites, bowls and flushing cisterns, have a full flush volume of a maximum of 6 litres and a maximum average flush volume* of 3,5 litres;
e) Urinals use a maximum of 2 litres/bowl/hour. Flushing urinals shall have a maximum full flush volume of 1 litre.
f) Washing machine appliances covered by Regulation (EU) 2017/1369 shall have calculated water consumption within the relevant limits set out in the table below.
g) Dishwasher appliances covered by Regulation (EU) 2017/1369 shall have calculated water consumption within the relevant limits set out in the table below.

* the average flush volume shall be considered as the average of one full flush and three partial flushes when a dual flush function is available.

Washing machine appliances		Dishwasher appliances	
Rated capacity	Calculated water consumption	Capacity	Calculated water consumption
Up to 5kg	39 litres/cycle	Up to 12 place settings	9 litres/cycle
>5kg to 6kg	37 litres/cycle	>12 place settings	10 litres/cycle
>6kg to 7kg	43 litres/cycle		
>7kg to 8kg	56 litres/cycle		

Assessment and verification: The applicant shall provide a declaration of compliance, together with an inventory of all of the relevant water efficient fittings, devices and appliances used. The inventory shall include details of the already installed fittings, devices and appliances to the extent possible.

The water flow performance of each of the relevant newly procured and installed taps, showers, WCs and urinals shall be attested by product datasheets or an existing product label in the Union, in accordance with the following technical specifications:

1. The flow rate is recorded at the standard reference pressure 3 – 0/+ 0,2 bar or 0,1 – 0/+ 0,02 for products limited to low pressure.
2. The flow rate at the lower pressure 1,5 – 0/+ 0,2 bar is ≥ 60 % of the maximum available flow rate.
3. For mixer showers, the reference temperature is 38 ± 1 °C.
4. Where the flow has to be lower than 6 L/min, it complies with the rule set out in point 2.
5. For taps the procedure described in clause 10.2.3 of EN 200 is followed, with the following exceptions:
   (a) for taps that are not limited to low pressure applications only: apply a 3 – 0/+ 0,2 bar pressure to both the hot and the cold inlets, alternatively;
   (b) for taps that are limited to low pressure applications only: apply a 0,4 – 0/+ 0,02 bar pressure to both the hot and the cold inlets and fully open the flow control.

In cases where the establishment is located in a river basin subjected to seasonal water stress, the performance of a representative selection of already-installed fittings and appliances shall be assessed onsite using portable flowmeters or volumetric receptors and a timer.
For washing machine and dishwasher appliances, the calculated water consumption shall be attested by information appearing on the energy label and product information sheet.

1101

1102 WW3 (m): Measures to reduce laundry demand

Existing requirement on laundry reduction in criterion 16 (in Decision (EU) 2017/175)
Criterion 16. Reduction in laundry achieved through reuse of towels and bedclothes *The tourist accommodation shall change sheets and towels by default at the frequency established by its environmental action programme that shall be inferior to every day unless requested by law or national regulations or established by a third-party certification scheme the accommodation service is participating in. More frequent changes shall be only carried out if explicitly requested by guests.* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation on the frequency established by the tourist accommodation, or by the third party certification or by law or national regulations.*
Proposed criterion (WW3(m)): Measures to reduce laundry demand
The water (and energy and chemical) consumption of laundry services shall be reduced by the following measures: - The standard frequency for the change of bed-linen shall be once per week, or between stays when stays are for periods of less than one week. If stays are for slightly longer than one week (i.e. 8 or 9 days), the bed-linen shall remain unchanged until the end of that stay. - An opt-in procedure for the washing of towels, where guests are informed that only towels placed in a specific location or container will be taken for laundry by housekeeping staff during their stay. Assessment and verification: The applicant shall provide a description of the policy on the collection of used guest towels for laundry, supported by an image of the information presented to guests on this matter (as per GM3).

1103

1104 WW4 (m): Swimming pool covering

Existing requirements relating to swimming pool covering from Decision (EU) 2017/175
Criterion 47. Optimised pool management (up to 2,5 points) *(a) Heated swimming pools and outside whirlpool shall be covered at night. Non-heated filled swimming pools and outside whirlpool shall be covered when not used for more than a day to reduce evaporation (1 point).* *[...]* *Assessment and verification* *The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation (e.g. photographs showing covers, automatic dosage systems or type of pool, documented procedure to use the automatic dosage systems).*
Proposed criterion (WW4 (m)) on covering of heated pools in TR1
The heating of water in outdoor swimming pools or hot tubs shall not be permitted unless it uses direct solar radiation, geothermal or waste heat recovery as the heat sources. All heated swimming pools and hot tubs (indoor or outdoor) shall be covered during periods of non-use and when still with standing water in order to reduce evaporation and heat loss, and to reduce the humidity loads on dehumidification equipment. Examples of such non-use periods include night-time closures, shock chlorine dosing or the need for maintenance of key equipment. Assessment and verification: The applicant shall provide a declaration of compliance, supported by a description of all heated swimming pools and hot tubs in the establishment, photographic evidence of the installed cover(s), the total heated pool surface areas that can be covered and a copy of the operating procedures for pool closure and covering.

1105

1106 WW5 (m): Wastewater treatment

Existing requirement relating to wastewater treatment (in Decision (EU) 2017/175)
Criterion 59. Waste water treatment (up to 3 points) *(a) If car washing facilities are offered within the tourist accommodation, car washing shall be allowed only in areas which are specially equipped to collect the water and detergents used and channel them to the sewerage system (1 point).* *(b) Where it is not possible to send waste water for centralised treatment, on-site waste water treatment shall include pretreatment (sieve/bar- rack, equalisation and sedimentation) followed by biological treatment with > 95 % BOD (biochemical oxygen demand) removal, > 90 % nitrification and (off-site) anaerobic digestion of excess sludge (2 points).* *Assessment and verification* *The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation (e.g. photographs for requirement (a) and technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the wastewater system for requirement (b)).*
Proposed criterion (WW5 (m)): on wastewater treatment
Note: This requirement only applies to tourist accommodation establishments that are not connected to a mains sewerage network operated by or controlled by authorities that are liable for compliance with the Urban Wastewater Treatment Directive (EU) 2024/3019.

~~(a) If car washing facilities are offered within the tourist accommodation, car washing shall be allowed only in areas which are specially equipped to collect the water and detergents used and channel them to the sewerage system (1 point).~~

~~(b)~~ Where it is not possible to send wastewater for centralised treatment, onsite wastewater treatment shall include primary treatment (for solids removal) ~~pretreatment (sieve/bar- rack, equalisation and sedimentation) followed by~~ and secondary biological treatment with > ~~95~~70 % removal, expressed as BOD (biochemical oxygen demand), or >75% removal, expressed as COD (Chemical Oxygen Demand).

In cases where the establishment is located in a designated Nitrate Sensitive Area, >~~98~~0 % removal of total nitrogen.~~nitrification and (off-site)~~

Sewage sludge shall be thickened and dewatered onsite prior to any further treatment or disposal onsite or via third parties. ~~Wastewater anaerobic digestion of excess sludge (2 points).~~

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation ~~(e.g. photographs for requirement (a) and~~ technical specifications from the manufacturer or the professional technicians responsible for installation, sale or maintenance of the wastewater treatment and sludge handling system~~s for requirement (b))~~.

Data from periodic sampling of influent wastewater and treated effluent that demonstrates the required pollutant removal efficiencies shall be provided together with the declaration of compliance.

WW6 (o): Greywater reuse systems

Existing requirement relating to greywater (in Decision (EU) 2017/175)
Criterion 48. Rainwater and grey water recycling (up to 3 points) *The accommodation shall use the following alternative water sources for non-sanitary and non-drinking purposes in the accommodation facility:* *(i) reclaimed water or grey water from laundry and/or showers and/or lavatory sinks (1 point);* *[...]* *Assessment and verification* *The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with photographs showing alternative water distribution systems, and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.*
Proposed criterion (WW6 (o)): on greywater reuse
Note: Up to X points shall be awarded under this criterion. If the tourist accommodation establishment is located in a river basin subjected to seasonal water stress (see the 6th point in the description requirement under the general assessment and verification text), up to 3X points shall be awarded. Points shall be awarded in proportion to the number of guest rooms and communal toilets connected to the greywater system. The tourist accommodation shall reduce potable water demand by having an EN 16941-2 compliant greywater system that accepts inputs from shower/bathtub drains and bathroom sink drains, is treated and stored onsite, and supplied for use in toilet flushing and irrigation. Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance, supported by a description of the greywater system, photos, and technical documentation provided by the greywater system installer/provider. All greywater conveyance piping and storage tanks shall be clearly labelled.

1110 WW7 (o): Rainwater harvesting systems

Existing requirement relating to rainwater harvesting (in Decision (EU) 2017/175)
Criterion 48. Rainwater and grey water recycling (up to 3 points) *The accommodation shall use the following alternative water sources for non-sanitary and non-drinking purposes in the accommodation facility:* *[...]* *(ii) rainwater via rooftop (1 point);* *[...]* *Assessment and verification* *The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with photographs showing alternative water distribution systems, and appropriate assurances that the sanitary and drinking water supply is kept entirely separate.*
Proposed criterion (WW7 (o)): on rainwater harvesting in TR1
Note: Up to 1.5X points may be awarded under this criterion. Points shall be awarded in proportion to the number of guest rooms connected to the rainwater system. The tourist accommodation shall reduce potable water demand by having an EN 16941-1 compliant rainwater harvesting system that accepts inputs from rooftops, is filtered and stored onsite, and supplied for use in toilet flushing and irrigation (0.5X points). Rainwater shall also be harvested by collection of ground runoff from sustainable urban drainage systems installed onsite (X points). Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance, supported by a description of the rainwater harvesting system, photos, and technical documentation provided by the rainwater harvesting system installer/provider. All rainwater conveyance piping and storage tanks shall be clearly labelled.

1111

1112 WW8 (o): Water saving measures with irrigation

Existing requirement relating to irrigation (in Decision (EU) 2017/175)
Criterion 49. Efficient irrigation (1,5 points) *The applicant shall fulfil at least one of the following requirements:* *(a) the tourist accommodation shall have a documented procedure for watering outside areas/plants, including details on how watering times have been optimised and water consumption minimised. This may, for example, include no watering of outside areas. (1,5 points);* *(b) the tourist accommodation shall use an automatic system which optimises watering times and water consumption for outside areas/plants. (1,5 points).* *Assessment and verification* *The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation including details of the documented system/procedure for watering or photographs showing the automatic watering systems.* *Criterion 50. Native or non-invasive alien species used in outdoor planting (up to 2 points)* *During the validity period of the EU Ecolabel, the vegetation of outdoor areas, including any aquatic vegetation, shall be composed of native and/or non-invasive alien species:* *(i) absence of invasive alien species of Union concern (0,5 point) (other invasive alien species may be present);* *(ii) exclusively non-invasive alien species (1 point);* *(iii) native and/or non-invasive alien species (1,5 point);* *(iv) exclusively native species (2 points).*

For the purposes of this EU Ecolabel, native species means plant species that occur naturally in the country. For the purposes of this EU Ecolabel, non-invasive species means plant species that do not naturally occur in the country and for which there is no evidence that they reproduce, establish and spread easily or that they may have negative impacts on native biodiversity.
Outdoor planting shall exclude invasive alien species of Union concern within the meaning of Article 3(3) of Regulation (EU) No 1143/2014 of the European Parliament and of the Council (31).
Assessment and verification
The applicant shall provide the relevant specification of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation by an expert.

Proposed criterion (WW8 (o)): water saving measures with irrigation in TR1

Note: This criterion applies when the tourist accommodation establishment has a vegetated area of at least 1000m2. Up to X points shall be awarded under this criterion. If the tourist accommodation establishment is located in a river basin subjected to seasonal water stress (see the 6th point in the description requirement under the general assessment and verification text), up to 3X points shall be awarded.

Irrigation between sunrise and sunset shall not be permitted. Furthermore, the irrigation system shall comply with one or more of the following aspects:

- Total irrigation water consumption shall be monitored via sub-metering and the flow of any mains water to the irrigation system shall be separately sub-metered (10% of points).
- Irrigation water shall be preferentially sourced from greywater and/or harvested rainwater systems (40% of points).
- Drip irrigation or sub-surface irrigation shall be used for large bushes and trees (20% of points).
- All exposed soil areas in planting beds shall be covered with a layer of organic mulch of at least 50mm depth (10% of points).
- The irrigation system shall include soil moisture sensors to prevent irrigation during or after rainfall or during wet seasons (10%).
- The irrigation system shall be periodically checked for correct orientation, leaks, blockages, sensor calibration and pump/valve actuation (10%).

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a description of the irrigation system, including details of any meters, any connections to greywater or harvested rainwater systems, the type of water distribution techniques used, identification of any planting beds and its covering, the installation of moisture sensors and their setpoints plus an inspection program for noting meter readings, checking for leaks and the correct operation of equipment and sensors.

Rationale for theme 3: Water and wastewater

Regarding WW1, monitoring water consumption at a sufficiently granular level is the foundation of any water-efficiency programme. Hotels often have complex water use profiles, with substantial differences between accommodation areas and additional services such as restaurants, MICE, leisure facilities and laundry. Monthly monitoring allows the establishment to identify trends, detect unexpected increases caused by leaks or malfunctioning equipment, and correlate water use with guest activity. Sub-metering is particularly important to separate the water used for accommodation from additional activities so that fair and comparable benchmarks can be applied across different types of tourist establishments.

By requiring a structured water monitoring system supported by meter readings and invoices, this criterion ensures that water data is reliable and can be used for performance improvement. It also increases transparency and enables the identification of areas with disproportionate consumption.

Accurate and consistent data collection is an essential precondition for both diagnosing inefficiencies and verifying compliance with other water-related criteria.

Regarding WW2, requirements for water efficient sanitary fittings and appliances are important because they are significant drivers of water consumption in hotels, mostly being used intensively and directly by guests. Setting maximum flow rates and flush volumes ensures that new equipment procured by the establishment meets recognised performance standards for water efficiency. The selected thresholds reflect proven, widely available technologies that reduce water use without compromising user comfort, hygiene or operational effectiveness. Lower water consumption also reduces associated energy use for hot water production and wastewater generation, providing added environmental benefits.

Requirements are placed on new equipment in most tourist accommodation establishments to avoid the premature end of life of less efficient devices, fittings and appliances, which would compromise circular economy principles. However, these requirements are mandated from the point of award of the EU Ecolabel licence for establishments located in river basins that are subjected to severe seasonal water stress (according to the Level(s) indicator 3.1 calculator) ([20]) – because in those cases, water efficiency is a pressing issue requiring immediate action. The ambition level and assessment and verification requirements are generally aligned with the thresholds defined in the EU Taxonomy DNSH criteria for new construction and renovation of buildings.

The requirements on dishwashers and washing machines are more relevant to cases where these are made available for direct guest use in apartments. The scope of these requirements is limited to household size appliances, where the water consumption performance is clearly indicated on the energy label and made available in product information sheets according to the Delegated Regulations (EU) 2019/2017 ([21]) and 2019/2014 ([22]). Dishwashers and washing machines used in hotel facilities will normally be much larger and out of the scope the aforementioned regulations.

By aligning flow rate specifications with recognised testing standards, the criterion ensures performance can be verified objectively. It also stimulates market demand for efficient products and prevents the installation of high-consumption fittings that would lock the establishment into higher water use for years. This criterion ensures that, over time, water-efficient technologies become the norm across all guest-facing and back-of-house areas.

Regarding WW3, this requirement is a demand-side approach to reducing water consumption in laundry. Laundry is one of the highest water-consuming activities in tourist accommodation, particularly in hotels with daily linen and towel changes. Behavioural research consistently confirms that many guests do not require or expect daily replacement of towels and bed-linen (Bohner and Schluter, 2014). Reducing unnecessary laundering therefore provides an immediate and significant opportunity to cut water, energy and detergent use while maintaining guest satisfaction. A standard

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[20] The water calculator file is available here at this link.

[21] Commission Delegated Regulation (EU) 2019/2017 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of household dishwashers and repealing Commission Delegated Regulation (EU) No 1059/2010 (OJ L 315, 5.12.2019, pp. 134–154). Available here.

[22] Commission Delegated Regulation (EU) 2019/2014 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of household washing machines and household washer-dryers and repealing Commission Delegated Regulation (EU) No 1061/2010 and Commission Directive 96/60/EC. (OJ L 315, 5.12.2019, pp. 29–67). Available here.

weekly linen change, or between-stays replacement for short visits, is fully compatible with hygiene and comfort standards.

The opt-in towel policy empowers guests to participate in water savings without compromising cleanliness. Clearly communicated procedures also reduce the risk of misunderstanding between guests and housekeeping staff. These measures are already widely adopted in the accommodation sector and are proven to achieve meaningful reductions in laundry frequency, contributing directly to reduced freshwater extraction and lower chemical and energy use in washing processes.

Regarding WW4, on swimming pool and hot tub covering is relevant since they experience very high evaporation losses, especially in heated installations. Evaporation not only increases total water consumption but also drives significant energy demand for reheating and maintaining humidity control in indoor pools. Covering pools during periods of non-use (such as night-time, maintenance periods, or when the facility is closed) is a simple and highly effective adaptation that can reduce evaporation by 50–70% ([23]). This easy-to-implement and verify measure results in substantial water savings, reduced heating demand and lower humidity loads on dehumidification equipment.

The prohibition on heating outdoor pools using fossil energy and the requirement for solar, geothermal or waste-heat sources further ensures that leisure amenities do not cause disproportionate environmental impacts. The combination of heat-source restrictions and mandatory pool covers ensures that pool operation remains compatible with water-efficiency and climate objectives while preserving guest experience.

Regarding WW5, this requirement has been inserted as part of the restructuring to put wastewater aspects together with water aspects. Originally this requirement was listed under "waste and wastewater". This requirement is now mandatory instead of optional. The reason for this is twofold. First of all, a large establishment represents a larger point source of wastewater and pollutant load - therefore meriting more effort for onsite treatment than smaller establishments when the connection to a sewerage mains is not feasible. Secondly, the new urban wastewater treatment Directive (EU) 2024/3019 ([24]) lowers the minimum threshold for mandatory sewage treatment to areas with populations of 1000 person equivalents (it was previously 2000).

The pollutant removal thresholds are aligned with the urban wastewater directive. There are several different test methods possible, but the analytical techniques should be specified in the User Manual later as EU Ecolabel criteria are not supposed to state specific test standards anymore.

The requirement for sludge thickening and dewatering is to reduce the sludge volumes that need to be stored, handled and transported.

Regarding WW6, greywater from showers and washbasins represents a large, relatively clean stream of wastewater that can be safely reused after appropriate treatment. Using treated greywater for toilet flushing and irrigation can reduce potable water demand by 25–40% in typical hotel operations (Friedler et al., 2005). This criterion incentivises investment in decentralised water

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[23] For example see the Dxair indoor pool design guidelines, available here: https://dxair.com/pdf/designguide/pool-covers-reduce-costs.pdf. Also see the US Department of Energy website on this topic: https://www.energy.gov/energysaver/swimming-pool-covers

[24] Directive (EU) 2024/3019 of the European Parliament and of the Council of 27 November 2024 concerning urban wastewater treatment (recast) (OJ L, 2024/3019, 12.12.2024). Available here.

reuse technologies that improve resource efficiency and reduce pressure on local water supplies, particularly in areas experiencing seasonal water stress due to tourism peaks.

Requiring compliance with EN 16941-2 ensures that systems meet recognised standards for hygiene, treatment performance and safety. By awarding points in proportion to the number of connected rooms and toilets, the criterion encourages broad application while recognising partial implementation. Greywater reuse also reduces the volume of wastewater discharged into municipal systems, contributing to improved water cycle sustainability.

Regarding WW6, rainwater is a readily available, low-impact resource that can be used for non-potable applications such as toilet flushing and irrigation. If capacity is sufficient, harvesting rooftop rainwater reduces the consumption of treated drinking water and can significantly mitigate peak water demand in tourist establishments during high-season periods, when local water resources may already be stressed. Rainwater harvesting systems also help manage stormwater runoff and reduce peak runoff rates to local watercourses and, in the case of combined sewers, reduce peak hydraulic loading rates on the sewerage system.

The requirement for compliance with EN 16941-1 ensures that systems are designed and operated according to established safety and performance standards. Awarding points based on the number of guest rooms served encourages installations sized to the establishment's real needs. Overall, this criterion promotes a distributed water supply solution that is robust, sustainable and aligned with circular-economy principles in water management.

Regarding WW7, professional laundries equipped with continuous-batch washers or certified with an ISO Type I ecolabel operate at much higher water- and energy-efficiency levels than typical in-house laundry facilities in hotels. These systems optimise water reuse, operate at high load factors and integrate advanced heat recovery technologies that substantially reduce the environmental footprint of laundering. Outsourcing to efficient professional laundries therefore enables hotels to reduce total water consumption while maintaining high hygiene standards and service quality.

According to the BEMP document, large, professional laundries consistently outperform small, decentralized hotel laundries on water, energy, and chemical efficiency. State-of-the-art facilities routinely achieve 5–6 L water/kg textiles (vs >20 L/kg in non-optimised small laundries), with best-in-class lines demonstrating as low as ~2 L/kg through process optimisation and water recycling. Continuous batch washers (CBWs) with counter-current flow are the sector's reference technology for loads >250 kg/h: discrete 25–100 kg batches travel through a tunnel of temperature/chemistry zones while fresh water is injected only at the final rinse and cascades upstream, inherently recycling water and heat.

Limiting eligible laundries to those located within 100 km promotes local service provision and avoids emissions associated with long transport distances. Awarding points proportionally to the share of outsourced laundry incentivises gradual improvement while recognising establishments that operate their own highly efficient processes. This criterion aligns water conservation with both operational efficiency and the broader goals of sustainable supply-chain management.

Regarding WW8, landscape irrigation can represent a major component of water use in tourist accommodation, particularly in warm climates and for establishments with extensive gardens or outdoor facilities. Inefficient irrigation practices — including daytime watering, surface spraying, or poorly maintained systems — can result in substantial water losses through evaporation, runoff and leakage. By restricting irrigation to night-time and promoting high-efficiency distribution methods such as drip or subsurface irrigation, this criterion directly reduces outdoor water demand.

The additional measures (rainwater/greywater supply, mulching, soil moisture sensors and regular maintenance checks) collectively address the main drivers of irrigation inefficiency. Mulch reduces evaporation and enhances soil moisture retention, while moisture sensors prevent unnecessary watering. Sub-metering and regular inspections support accountability and continuous improvement. This criterion therefore promotes a holistic, integrated approach to landscape water management that improves resilience, reduces potable water use and prevents over-irrigation.

What do other EU Ecolabels say?: Relevant requirements in other ecolabel schemes, including the current EU Ecolabel criteria are compared in the table below. Due to the high number of criteria being compared, the comparison is presented in a matrix format.

Table 8. Comparison of ecolabel schemes on requirements to report water consumption

Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
WW1 (m): Water consumption monitoring	See O13		Related to 4.1, 4.3 and 4.13	Related to 3.1 and 3.5
WW2 (m): Water efficient fittings and devices	Related to O16	Related to W02 and G16	Related to 4.2, 4.4, 4.5, 4.6, 4.7, 4.14	Related to parts of 3.7
WW3 (m): Measures to reduce laundry demand	Related to O15		Related to 5.2	
WW4 (m): Swimming pool covering	Related to O11 (under energy)	Related to E12 (under energy)	Related to 4.11	
WW5 (m): Wastewater treatment		Related to W09	Related to 4.8 and possibly to 4.15	
WW6 (o): Greywater reuse systems		Related to F07	Partly related to 4.15	Potentially related to parts of 3.7
WW7 (o): Rainwater harvesting systems		Related to F07	Related to 4.16	Potentially related to parts of 3.7
WW8 (o): Water saving measures with irrigation		Related to F08	Related to 10.3	Related to a part of 3.7

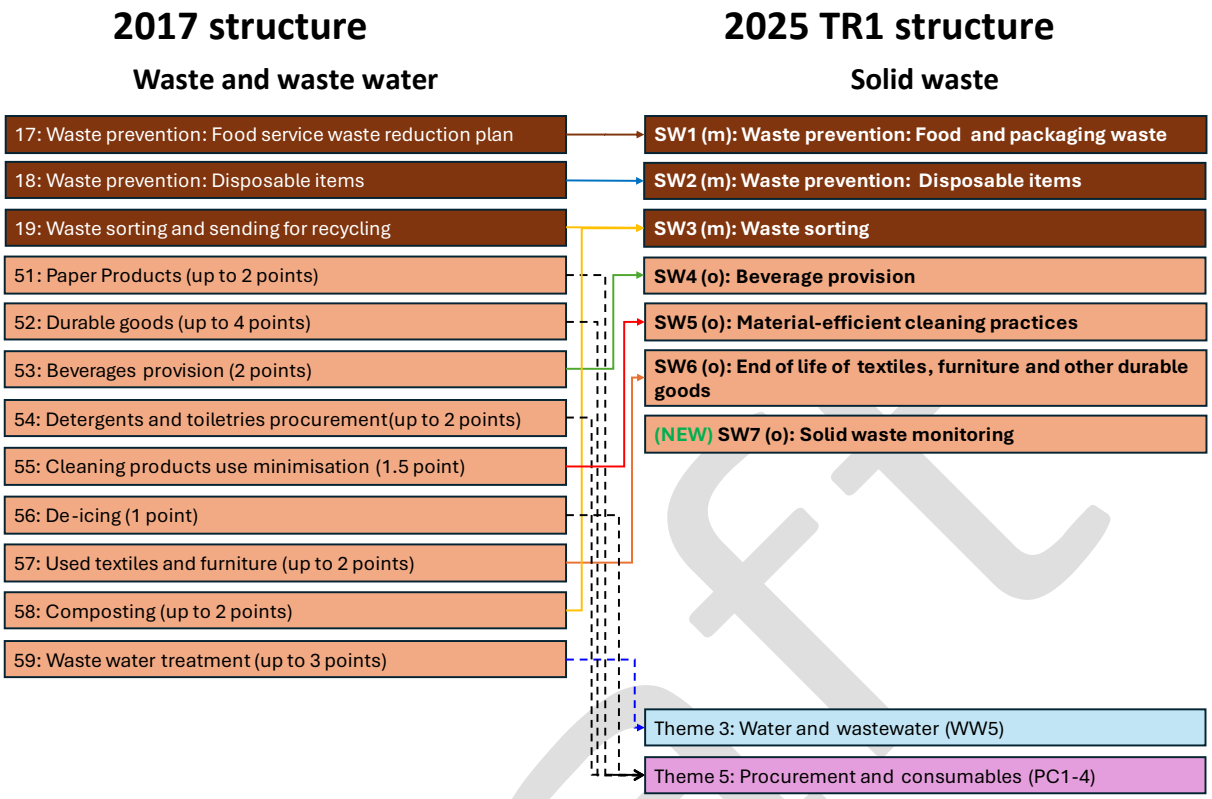
Source: As per the links in the header row of the table.

As shown in the table above, each of the proposed requirements are also present in more than one of the other four main ecolabels identified. All of the measures that relate to hot water savings (WW2, WW3 and WW4) will have simultaneous benefits on energy consumption.

Theme 4: Solid waste

A comparison of the individual criterion headings in the 2017 criteria and the TR1 proposals under the theme of "solid waste" is illustrated below.

Figure 10. Comparison of existing solid waste criteria with TR1 proposal



Source: Own elaboration.

Regarding criteria structure, the requirements on waste and wastewater from Decision (EU) 2017/175 have been restructured into a dedicated theme focusing solely on solid waste to simplify compliance and sharpen focus. Procurement-related provisions that previously appeared under these criteria have been relocated to a new theme that is procurement-focused (Theme 5).

The new solid waste section contains six criteria (SW1–SW6): three mandatory and three optional. Together, they address not only day-to-day waste management but also circularity, prioritising prevention, reuse, and high-quality recycling to avoid end-of-life pathways with higher environmental impacts.

Criterion on composting (No. 58) is now merged with SW3 due to fact that biogenic waste shall be collected separately before being sent for composting or being composted onsite. A new criterion on the monitoring of solid waste generated (SW6) is included as optional to incentivise the gathering of quantitative data to permit more accurate waste tracking and reporting.

The criterion on wastewater treatment (No. 59) has been moved to the theme on water and wastewater as part of the restructuring (now WW5, and mandatory instead of optional).

Regarding anonymised licence holder data, a review of points awarded to 43 different licences were provided by CBs. The table below presents an overview of where points were awarded and which optional energy criteria were being complied with.

Table 9. Points awarded to optional "waste and wastewater" criteria in Decision (EU) 2017/175

	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. / Max.	With points	Avg. / Max.	With points	Avg. / Max.
53. Beverages in returnable/refillable containers	15 of 20	1.87/2	1 of 3	1/2	14 of 20	2/2
55. Efficient use of cleaning products	14 of 20	1.5/1.5	0 of 3	n/a	18 of 20	1.5/1.5
57a) Used furniture and textile donations	10 of 20	1/1	2 of 3	1/1	12 of 20	1/1
57b) Procurement open to reused and second-hand products	3 of 20	1/1	2 of 3	1/1	9 of 20	1/1
58a) Composting of yard waste	12 of 20	1/1	2 of 3	1/1	12 of 20	1/1
58b) Composting of food waste	8 of 20	1/1	3 of 3	1/1	15 of 20	1/1
58c) Composting of biodegradable products	0 of 20	n/a	0 of 3	n/a	3 of 20	1/1
58d) Composting of biodegradable guest waste	2 of 20	1/1	0 of 3	n/a	3 of 20	1/1
Average points awarded for solid waste and wastewater		4.20		3.33		5.62

Source: Anonymised data provided by competent bodies

The data provided by competent bodies also included a distinction based on the nature of the tourist accommodation in line with the options that can be filtered on the EU Ecolabel tourist accommodation catalogue ([25]). The data could be split into hotels, cottages and campsites, which more or less aligns with the proposals for annexes I, II and III in TR1.

Insights are limited because the data provided (n=43) represents less than 5% of the total EU Ecolabel licenced tourist accommodation. The very low number of datasets for cottages (n=3) makes it difficult to draw any meaningful conclusion on that data.

Focusing on campsites and hotels (each n=20), it was clear that two of the sub-requirements on composting had little or no uptake. All other criteria had at least a moderate uptake. A high uptake was noted with criterion 53 on returnable/refillable containers (30 of 43) and criterion 55 on the efficient use of cleaning products (32 of 43). Criterion 57 about second lives for certain durable goods and criterion 58 of yard waste and food waste composting had reasonable uptake. However, the composting of biodegradable "materials" did not have much uptake at all (58c) and 58d). Finally, the requirements on criterion 59 relating to wastewater had a low uptake, probably due to the fact that most were already connected to the mains sewerage network.

A comparison of the TR1 proposals with any existing requirements in Decision (EU) 2017/175 is provided in the tables below.

SW1 (m): Waste prevention: Food and packaging waste

Existing requirements on waste prevention: food and packaging waste from Decision (EU) 2017/175)
Criterion 17: Waste prevention: Food service and waste reduction plan *Without prejudice to the local or national regulation on provision of food services:* *a) With the aim to reduce package waste: No single dose packages for non-perishable food stuffs (e.g. coffee, sugar, chocolate powder (except tea bags)) shall be used for food services.* *b) With the aim to balance package/food waste depending on the season: For all perishable food stuffs (e.g. Yogurt, jams, honey, cold meats, pastries), the tourist accommodation shall manage the provision of food to guests to minimise both food and packaging waste. To achieve this, the tourist*

[25] The EU Ecolabel tourist accommodation catalogue can be found here at this link.

accommodation shall follow a documented procedure linked to the action program (criterion 1) which specifies how the food waste/packaging waste balance is optimised based on the number of guests.

Exempt from this criterion are: shops and vending machines under management of the tourist accommodation and single-dose sugar and/or coffee inside rooms under the condition that the products used for this purpose is fair trade and/or organic certificated and used coffee capsules (if applicable) are given back to the producer for recycling.

Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and the documented procedure which outlines how both food and packaging waste are minimised. Any legislation requiring the use of single dose products shall also be provided. If applicable, documentation to demonstrate the conditions required in the exemption shall be provided (e.g. take-back declaration from coffee capsules producer, organic and/or fair trade packaging label). This will be moreover checked during the on-site visit.

Perishable food is defined as being subject to decay or destruction, usually food that has been, for example minimally processed or not otherwise preserved and which relies on refrigerated storage in order to reduce the rate of decay and loss of quality (Codex Alimentarius).

Proposed criterion (SW1(m)) on waste prevention: food and packaging waste in TR1

Without prejudice to the local or national regulation on provision of food services:

a) With the aim to reduce package waste: No single dose packages for non-perishable food stuffs (e.g. coffee, sugar, chocolate powder (except tea bags)) shall be used for food services.

b) ~~With the aim to balance package/food waste depending on the season: For all perishable food stuffs (e.g. Yogurt, jams, honey, cold meats, pastries), t~~The tourist accommodation establishment shall manage the provision of perishable food stuffs (e.g. yogurt, jams, honey, cold meats, pastries)~~food~~ to guests to minimise both food and packaging waste. To achieve this, ~~the tourist accommodation shall follow~~ a documented procedure linked to the action program (criterion GM1), which specifies how the food waste/packaging waste balance is optimised based on the number of guests, shall be applied.

c) The use of disposable capsules for coffee machines in guest rooms and/or in the corridor, shall only be permitted if the capsules consist of minimum 75% recycled or 100% renewable material.

Exempt from this criterion are: shops and vending machines under management of the tourist accommodation establishment and single-dose sugar and/or coffee inside rooms under the condition that the products used for this purpose are~~is~~ fair trade and/or organic certificated ~~and used coffee capsules (if applicable) are given back to the producer for recycling.~~

Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and the documented procedure referred to in point b), which outlines how both food and packaging waste are minimised.

~~Any legislation requiring the use of single dose products shall also be provided. If applicable, documentation to demonstrate the conditions required in the exemption shall be provided (e.g. take-back declaration from coffee capsules producer, organic and/or fair trade packaging label). This will be moreover checked during the on-site visit.~~

For the purposes of this criterion, ~~P~~perishable food is defined as being subject to decay or destruction, usually food that has been, for example minimally processed or not otherwise preserved and which relies on refrigerated storage in order to reduce the rate of decay and loss of quality (Codex Alimentarius).

Regarding point c) where coffee capsules are used, the applicant shall provide a declaration describing capsule material and the recycling process of the capsules, together with confirmation from the recycling operator verifying that the capsules are recycled.

If any exemptions apply to points a), b) or c), the applicant shall explain these in writing, supported by photos and references to any relevant legislation, as needed.

1299

SW2 (m): Waste prevention: Disposable items

Existing requirement on waste prevention: disposable items from Decision (EU) 2017/175)
Criterion 18: Waste prevention: Disposable items *a) Disposable toiletries items (shower caps, brushes, nail files, shampoos, soaps etc.) shall not be available to guests in rooms, unless they are requested by guests, there is a legal obligation or it is a requirement of independent quality rating/certification scheme or of hotel chain quality policy the tourism accommodation is a member of.* *b) Disposable food service items (crockery, cutlery, and water jugs) shall not be available to guests in rooms and restaurant/bar service, unless the applicant has an agreement with a recycler for such items.* *c) Disposable towels and bed sheets (draw sheet is excluded) shall not be used in rooms.* *Assessment and verification:* *The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation explaining how the criterion is fulfilled. Any legislation or independent quality rating/certification scheme requiring the use of disposable items shall also be provided. This shall be checked during the on-site visit.*
Proposed criterion (SW2(m)) on waste prevention: disposable items in TR1
The tourist accommodation establishment shall implement the following measures for preventing waste generation: a) The provision of hand soap, shower gel, shampoo or hair conditioner in refillable dispensers in all guest rooms. b) The non-provision of the following disposable items in guest rooms: shower caps, nail files, combs, show polish, toothbrushes, toothpaste, slippers*, cutlery and plastic cups. c) The non-use of disposable beverage containers in bar areas and restaurants belonging to the tourist accommodation establishment.** d) The non-use of non-biodegradable drinking straws, cocktail sticks and stirrers. * Exception applies to hotels where mandatory national legislation or the Hotelstars.eu classification system requires the provision of certain toiletry products to guests. In such cases, preference shall be given to bio-obased, biodegradable, recycled, or renewable material product/packaging. ** Except where safety considerations prohibit the use of glass or ceramic items for example, in pool areas, the use of disposable products is accepted. ~~c) Disposable towels and bed sheets (draw sheet is excluded) shall not be used in rooms.~~ Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with relevant documentation explaining how the criterion is fulfilled. Any legislation or independent quality rating/certification scheme requiring the use of disposable items shall also be provided. This shall be checked during the onsite visit.

SW3 (m): Waste sorting

Existing requirements on waste sorting from Decision (EU) 2017/175)
Criterion 19: sorting and sending for recycling *a) Without prejudice of the local or national regulation on waste separation, adequate containers for waste separation by guest shall be available in the rooms and/or on each floor and/or central point of the tourist accommodation.* *b) Waste shall be separated by the tourist accommodation into the categories required and/or suggested by the available local waste management facilities, with particular care regarding toiletries and hazardous waste e.g., toners, inks, refrigerating and electrical equipment, batteries, energy saving light bulbs, pharmaceuticals, fats/oils, and electrical appliances.* *Assessment and verification:*

The applicant shall provide a declaration of compliance with this criterion, together with an indication of the different categories of waste accepted by the local authorities, and/or relevant contracts with recycling services. This shall be checked during the on-site visit.

Criterion 58: Composting
The tourist accommodation shall separate at least one of following relevant waste category (1 point for each category, to a maximum of 2 points):
a) yard waste
b) food waste form the food services,
c) biodegradable products (e.g. disposable items made of corn-based materials),
d) biodegradable waste produced by guests at their room/accommodation, and shall ensure that it is composted and/or used for biogas production according to local authority guidelines (e.g. by the local administration, in-house or by a private agency).
Assessment and verification:
The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation if relevant.

Proposed criterion (SW3(m)) on waste sorting in TR1

Without prejudice to~~of~~ ~~the~~ local or national regulations on waste separation, the tourist accommodation establishment shall provide containers for the separate disposable of the following types of waste:

- Sanitary waste in the guest bathrooms and public toilets.
- Plastic containers and packaging in guest rooms and public areas.
- Paper and cardboard in guest rooms and public areas.
- Glass containers in guest rooms and public areas.
- Compostable biogenic waste (uncooked or non-meat/non-fish food waste, coffee grinds, garden waste), in kitchen areas and public areas.
- Small waste electrical and electronic equipment in public areas.
- Textile waste in backroom areas.
- Used cooking oil in kitchen areas.
- Unsorted other waste, in public areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the waste separation system, the approximate number of bins and their locations, and how each of the different waste fractions are dealt with.
This shall be checked during the onsite visit. In cases where certain categories of waste are not accepted by the local authorities, and~~/or~~ relevant waste contractors, the separate collection of those fractions in the list above may be exempted from this criterion. ~~with recycling services,~~

1303

1304 ## SW4 (o): Beverages provision

Existing requirement on the provision of beverages from Decision (EU) 2017/175

Criterion 53: Beverages provision
If beverages are offered (e.g. bar/restaurant service, shops and vending machines) under the ownership or the direct management of the tourist accommodation at least 50% (1point) or 70% (2points) of the beverages provision shall be on returnable/refillable containers.

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation if relevant.

Proposed criterion (SW4(o)) on the provision of beverages in TR1

No changes proposed in TR1, but first necessary to understand better what is meant by "returnable" and how should accounting of 100% of beverages be carried out.

SW5 (o): Material-efficient cleaning practices

Existing requirements on material-efficient cleaning practices from Decision (EU) 2017/175
Criterion 55. Minimisation of the use of cleaning products (1,5 point) *The tourist accommodation shall have precise procedures for the efficient use of cleaning products, such as use of micro-fibre products or other cleaning materials with similar effects and water cleaning activities or other cleaning activities with similar effects. To fulfil this criterion, all cleaning must be carried out by a method based on the efficient use of cleaning products except where required by law or by hygiene or health and safety practices.* *Assessment and verification* *The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation if relevant (e.g. copy of procedures, technical details of products used).*
Proposed criterion (SW5(o)) on material efficient cleaning practices in TR1
All cleaning must be carried out by a method based on the efficient use of cleaning products except where required by law or by hygiene or health and safety practices. The tourist accommodation establishment shall have ~~precise~~ procedures that enable the use of material ~~for the~~ efficient ~~use of~~ cleaning products that include at least one of the points below~~, such as~~: - The preferential use of ~~micro-fibre~~ cloths, mopheads ~~products~~ or other cleaning materials based on microfibres (0.5X points). ~~with similar effects and water cleaning activities or other cleaning activities with similar effects.~~ - The preferential use of any plastic mops, dustpans, brooms and buckets with a minimum recycled plastic content of at least 25% by mass (0.5X points). - The use of concentrated hard surface cleaning products which require a dilution rate of at least 1 in 100 before use (0.5X points). ~~- To fulfil this criterion, .~~ Assessment and verification: The applicant shall provide a declaration of compliance~~detailed explanation of how the tourist accommodation establishment fulfils this criterion~~, together with a copy of the in-house material-efficient cleaning procedures and appropriate supporting documentation, such as cleaning product technical sheets or packaging claims. ~~e.g. written procedure including end user contact details, receipts and records of goods previously reused or donated etc.~~

SW6 (o): End-of-life of textiles, furniture and other durable goods

Existing requirement on end of life of textiles, furniture and other durable goods from Decision (EU) 2017/175)
Criterion 57: Used textiles and furniture *Tourist accommodation shall have a procedure in place covering:* *a) All donation activities for all furniture and/or textiles that reach the end of their usable life within the tourist accommodation but are still usable. End users shall include charity, employees or other associations which collect and redistribute goods. (1 point)* *b) All reused/second-hand products procurement activities for furniture. Suppliers shall include second-hand markets or other associations/collectives which sell and/or redistribute used goods. (1 point)*

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation e.g. written procedure including end user contact details, receipts and records of goods previously reused or donated etc.

Proposed criterion (SW6(o)) on end-of-life of textiles, furniture and other durable goods in TR1

Tourist accommodation shall have an in-house procedure in place for dealing with furniture, textiles and other durable goods that have reached the end of their useful life at the tourist accommodation establishment but which are still usable (2X points).

The procedure shall include the following options to obtain second lives for durable goods:

- Donation or transfer to other tourist accommodation establishments owned by the same enterprise.
- Donation to employees.
- Donation to social economy enterprises.
- Sale at reduced prices at auction.

~~covering:All donation activities for all furniture and/or textiles that reach the end of their usable life within the tourist accommodation but are still usable. End users shall include charity, employees or other associations which collect and redistribute goods. (X point)~~

~~a) All reused/second-hand products procurement activities for furniture. Suppliers shall include second-hand markets or other associations/collectives which sell and/or redistribute used goods. (1 point)~~

Assessment and verification: The applicant shall provide a detailed explanation of how the tourist accommodation establishment fulfils this criterion, together with appropriate supporting documentation e.g. written procedure including end user contact details, receipts and records of goods previously reused or donated etc.

1309

1310 SW7 (o): Solid waste generation monitoring

Existing requirements on solid waste generation monitoring from Decision (EU) 2017/175

Criterion 5. Consumption monitoring

The tourist accommodation shall have procedures for collecting and monitoring data monthly or, at least, yearly, on the following aspects as a minimum:.

[...]

(d) waste generation per guest-night (kg/guest-night). Food waste shall be monitored separately (1);

[...]

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion, together with a description of the collecting and monitoring procedures. The tourist accommodation shall report a short summary of the data collected for the above-listed consumption parameters together with the internal evaluation report mentioned in criterion 1, which shall be made available to the competent body within 2 years after the application, and every 2 years.

Proposed criterion (SW7 (o)) on solid waste generation monitoring in TR1

Note: This requirement can only be met if the waste is weighed onsite prior to collection or is collected by contractors and not mixed with waste from other sources before being weighed at their facilities.

The applicant shall report on solid waste generation with a monthly resolution and overall annual value according to the table below. Reported data shall cover all parts of the hotel that are related to tourist accommodation, but may also include waste from other services if covered under the same waste management contract.

Table X. Solid waste generation reporting template for one year

Parameter (0.2X points per numbers item up to a maximum of X points)	J	F	M	A	M	J	J	A	S	O	N	D	Year

1. Separately collected paper/cardboard waste (kg or t)													
2. Separately collected plastic waste (kg or t)													
3. Separately collected glass waste (kg or t)													
4. Separately collected metal waste (kg or t)													
5. Separately collected yard waste (kg or t)													
6. Separately collected food waste (kg or t)													
7. Separately collected textile waste (kg or t)													
8. Separately collected WEEE (kg or t)													
9. Unsorted other waste (kg or t)													
Total guest-nights													
Specific accommodation-related consumption (kg/guest-night)													

Assessment and verification: The applicant shall provide a declaration of compliance, supported by a monitoring report that is based on records of waste monitoring data, taken as part of an in-house waste monitoring system or as part of a service provided by an external waste management contractor. These records shall be supported by waste collection invoices or delivery notes, as appropriate, and provided upon request to the competent body.

Rationale for Theme 4

This theme on solid waste prioritises waste prevention with focus on reducing food waste, packaging and disposable items (SW1-SW2), followed by waste sorting and verified transfer to recycling and composting (SW3). It also covers beverage provision designed around refillable and returnable containers (SW4), and responsible end-of-life for textiles and furniture through repair, reuse and/or donation (SW6). Waste generated is suggested to be measured regularly (SW6) to track trends and drive continuous improvement.

Regarding SW1, have been strengthened to promote circularity and resource efficiency. A new requirement on coffee capsules (part c) with a minimum recycled or renewable material content was added. Capsules must now be made from recycled materials and actually recycled, not just returned to suppliers, thus helping address their significant environmental impact due to mixed materials and landfill accumulation.

Regarding SW2, a clearer distinction is made between guest toiletries that must be provided (in refillable dispensers) and disposable toiletries and accessories that must now be provided. the list of disposable item consumption, establishments are required to replace single-use products with reusable or recyclable alternatives, minimizing resource use and waste generation. Disposable towels and bed sheets are banned from guest rooms, and exceptions for recycling agreements have been removed, as these rarely result in effective recycling.

Regarding SW3, the sorting or waste has been broadly presented to cover all of the main potential streams of solid waste and, in the case of waste cooking oil, liquid waste as well. The inclusion of garden waste and food waste as fractions to be sorted is the effective merging of the old criteria 19 and 58.

Regarding SW4, the same criterion as originally present in Decision (EU) 2017/175 is maintained in TR1. However, more clarity is needed on what exactly is meant by a returnable container for

beverages. It should be discussed in more detail with stakeholders. It might be now overlapping with the new requirement in SW2 (part c).

Regarding SW5, the criterion on material-efficient cleaning has been expanded and explained in extra detail compared to the equivalent requirement in criterion 55 of Decision (EU) 2017/175. Micro-fibre cloths and mopheads are considered as contributing to material efficiency, as are hard plastic components with a minimum recycled content of 25%. Furthermore, the use of concentrated products with high dilution rates are considered as being material efficient due to the reduced packaging required per area cleaned.

Regarding SW6, the criterion on material-efficient provision of toiletries to guests is a new requirement and is material-efficient in the sense that it drastically reduces the quantity of packaging required per delivery of a unit volume of toiletry product to guests. This approach is also more convenient to guests and housekeeping staff in the sense that there is no need to constantly replenish small quantities of toiletries. Depending on the size of refillable containers, there is a risk of excessive use of toiletries by guests, but this can be managed by limiting the size of the refillable containers or how much they are filled.

Regarding SW7, end-of-life management for textiles and furniture continues to focus on donation to employees and to charities and associations, but these last two terms are collectively referred to as "social economy enterprises". The scope is also extended to other durable goods just to potentially cover myriad other items that could potentially be reused. Other means are also added, namely auction at a heavily discounted price and transfer to other tourist accommodation establishments. Together, these four options should provide ample opportunity to find a second life for durable goods that would otherwise have been disposed of.

The part relating to the direct procurement of second-hand goods has been removed, since it is not very practical to implement at the level of an organisation and results in inefficient purchasing practices, since no two second-hand products will be equal.

Regarding SW8, a new and comprehensive approach to monitoring of waste quantities has been inserted. Knowledge about typical waste generation rates in hotels is very limited, as became evident during the research for task 4 in the background report. While collecting data on waste is a logistical challenge, having the separation of different waste fractions at the point of initial disposal onsite should help. This criterion is considered as most achievable in large hotels, where the quantities of waste are large enough to merit a separate waste collection contractor and/or have weighing equipment onsite. This data will enable the environmental manager to identify trends, estimate waste per guest-night rates, and continuously improve resource efficiency and waste reduction strategies.

Table 10. *Comparison of ecolabel schemes on requirements on solid waste*

Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
SW1(m): Waste prevention: Food and packaging waste	Related to 9.1	Related to K02:	Related to 6.5 and 6.18	Related to 4.2 and 4.3
SW2(m): Waste prevention: Disposable items	Related to 9.3	Related to R06:	Related to 6.9 and 6.11-6.13	Related to 4.4
SW3(m): Waste sorting	Related to 9.1 and 9.2	Related to A02 and A03	Related to 6.1-6.3, 6.7and 6.19	Related to 4.1, 4.5, 4.7

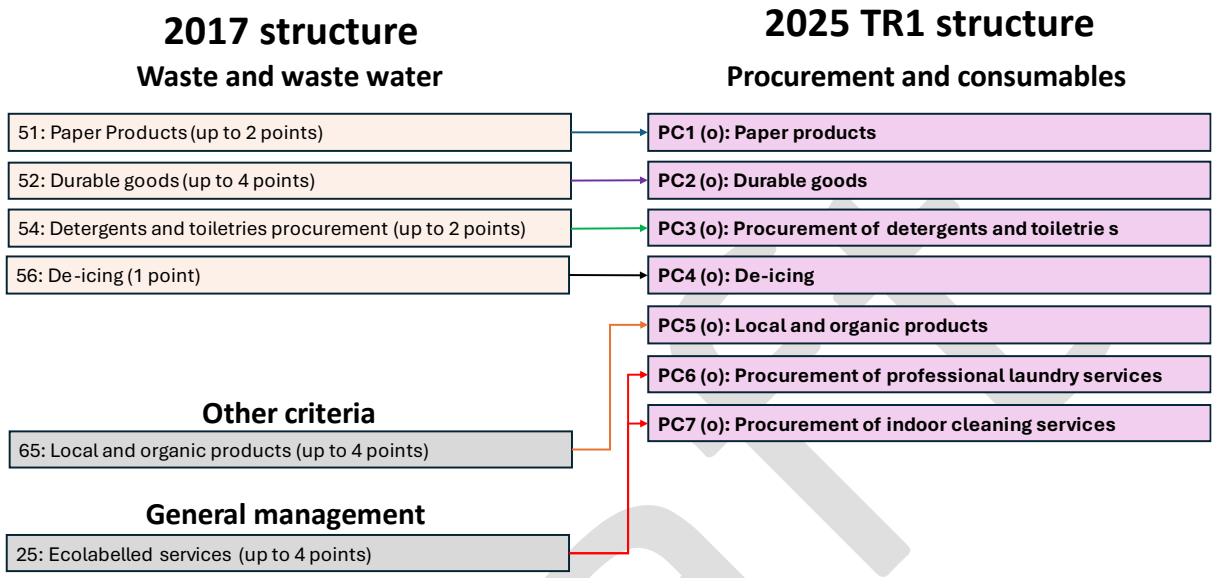
Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
SW4(o): Beverages provision	Related to Section 10 on sustainable food and drink	Related to K01: use of reusable containers and beverage cans	Related to 6.14 minimum of products delivered in reusable packaging	Related to 4.4 reusable system and take pack system
SW5(o): Material-efficient cleaning practices	Partly related to one part of O43.	Related to R09 and R11.	Related to 5.8	
SW6(o): End-of-life of textiles and furniture	Related to 9.1	Related to A09	Related to 11.11.	Related to 4.7.
SW7(o): Amount of waste generated	Related to O18 and O21	Related to F06:	Related to 6.15	Related to 4.8

Source: As per the links in the header row of the table.

Theme 5: Procurement and consumables

A comparison of the individual criterion headings in the 2017 criteria and the TR1 proposals under the theme of "procurement and consumables" is illustrated below.

Figure 11. Comparison of existing procurement and consumables criteria with TR1 proposal



Source: Own elaboration.

Regarding criteria structure, this section consolidates requirements that have a common theme of procurement. It collects requirements that were previously embedded under the "General Management", "Waste and Wastewater" and "Other" themes. By coupling all of them in one theme, the ecolabel strengthens outcomes from purchasing decisions that drive upstream waste prevention, circularity, and resource efficiency. Similar procurement-type requirements on energy-using and water-using equipment was considered as more suitable to stay in the dedicated themes on "Energy and Climate performance" and "Water and Wastewater".

The first five criteria in the new theme relate to tangible goods, while the last two relate to services. All have the common aspect of needing to carry some sort of label of environmental performance. This is normally an ISO Type I ecolabel, but it is an organic label in the case of PC5.

Regarding anonymised licence holder data, a review of points awarded to 43 different licences were provided by CBs. The table below presents an overview of where points were awarded and which optional energy criteria were being complied with.

Table 11. Points awarded to optional "waste and wastewater" criteria in Decision (EU) 2017/175

	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. / Max.	With points	Avg. / Max.	With points	Avg. / Max.
51a) Ecolabelled toilet paper	13 of 20	0.5/0.5	2 of 3	0.5/0.5	14 of 20	0.5/0.5
51b) Ecolabelled tissue paper	8 of 20	0.5/0.5	0 of 3	n/a	12 of 20	0.5/0.5
51c) Ecolabelled office paper	11 of 20	0.5/0.5	2 of 3	0.5/0.5	12 of 20	0.5/0.5
51d) Ecolabelled printed paper	3 of 20	0.5/0.5	0 of 3	n/a	2 of 20	0.5/0.5
51e) Ecolabelled converted paper	3 of 20	0.5/0.5	0 of 3	n/a	1 of 20	0.5/0.5
52a) Ecolabelled bed-linen, towels and tablecloths	0 of 20	n/a	0 of 3	n/a	3 of 20	0.5/0.5

	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. / Max.	With points	Avg. / Max.	With points	Avg. / Max.
52b) Ecolabelled computers	4 of 20	0.5/0.5	0 of 3	n/a	3 of 20	0.5/0.5
52c) Ecolabelled televisions	0 of 20	n/a	0 of 3	n/a	0 of 20	n/a
52d) Ecolabelled bed mattresses	0 of 20	n/a	0 of 3	n/a	1 of 20	0.5/0.5
52e) Ecolabelled wooden furniture	0 of 20	n/a	0 of 3	n/a	1 of 20	1/1
52f) Ecolabelled vacuum cleaners	3 of 20	1/1	0 of 3	n/a	0 of 20	n/a
52g) Ecolabelled floor coverings	1 of 20	1/1	0 of 3	n/a	2 of 20	1/1
52h) Ecolabelled imaging equipment	2 of 20	1/1	1 of 3	1/1	3 of 20	1/1
54a) Ecolabelled hand dishwashing detergents	3 of 20	0.5/0.5	2 of 3	0.5/0.5	5 of 20	0.5/0.5
54b) Ecolabelled dishwasher detergents	2 of 20	0.5/0.5	0 of 3	n/a	6 of 20	0.5/0.5
54c) Ecolabelled laundry detergents	3 of 20	0.5/0.5	2 of 3	0.5/0.5	3 of 20	0.5/0.5
54d) Ecolabelled all-purpose cleaners	8 of 20	0.5/0.5	1 of 3	0.5/0.5	8 of 20	0.5/0.5
54e) Ecolabelled sanitary detergents	9 of 20	0.5/0.5	2 of 3	0.5/0.5	7 of 20	0.5/0.5
54f) Ecolabelled soaps and shampoos	1 of 20	0.5/0.5	1 of 3	0.5/0.5	6 of 20	0.5/0.5
54g) Ecolabelled hair conditioner	0 of 20	n/a	0 of 3	n/a	2 of 20	0.5/0.5
56. De-icing	12 of 20	1/1	2 of 3	1/1	13 of 20	1/1
65a): At least 2 locally sourced food products	6 of 20	1/1	2 of 3	1/1	16 of 20	1/1
65b): Active choice of local suppliers/services	7 of 20	1/1	2 of 3	1/1	15 of 20	1/1
65c): At least 2 or 4 local products being organic	3 of 20	1.33/2	1 of 3	2/2	14 of 20	1.86/2
Average points awarded for waste and wastewater		7.10		6.33		8.90

Source: Anonymised data provided by competent bodies

The data provided by competent bodies also included a distinction based on the nature of the tourist accommodation in line with the options that can be filtered on the EU Ecolabel tourist accommodation catalogue ([26]). The data could be split into hotels, cottages and campsites, which more or less aligns with the proposals for annexes I, II and III in TR1.

Insights are limited because the data provided (n=43) represents less than 5% of the total EU Ecolabel licenced tourist accommodation. The very low number of datasets for cottages (n=3) makes it difficult to draw any meaningful conclusion on that data. Focusing on campsites and hotels (each n=20), it was clear that there were many optional criteria with a low uptake rate.

Requirements for ecolabel paper products showed a relatively high uptake, but there was considerable variation depending on the specific type of paper product in question. The procurement of toilet paper, tissue paper and office paper was much higher than for printed paper and converted paper. With printed paper, a diverse range of possible printed products could be included (e.g. menus, magazines, maps, tourist guides, guest instructions etc.). In cases where these are printed to specifications of the applicant, for example with their own content or branding, it is necessary to work with a printing-house that can meet the ecolabel requirements. With converted paper, which is now referred to as stationery paper, this would best relate to items such as notepads, envelopes, diaries and calendars. Again a potential obstacle would be needed to find a supplier who can customise these items but also manufacture them in line with the ecolabel criteria. A doubt that remains under the shared licence holder data is the fact that all references to the EU Ecolabel in criterion 51 are to Decisions that are repealed today. It is not clear if all of this has been checked for continued compliance after the newer Decisions for these products were adopted.

Regarding durable goods in criterion 52, the uptake is much lower than for paper products. In many cases the uptake is zero. Except for textiles and bed mattresses, all of the references to EU Ecolabel

[26] The EU Ecolabel tourist accommodation catalogue can be found here at this link.

Decisions are out of date. In several cases the EU Ecolabel was discontinued (e.g. computers, imaging equipment and vacuum cleaners). However, these products could perhaps be covered by other ISO Type I ecolabels.

With criterion 54 on detergents and toiletries, uptake was reasonable although all of the references to Commission Decisions are out of date. As with criterion 51, it is not clear if current licence holders also demonstrated compliance with the new ecolabel detergent and rinse-off cosmetic criteria. Finally, with criterion 65 on locally sources and/or organic foods, the uptake was quite high, being significantly higher in hotels than in campsites.

A comparison of the TR1 proposals with any existing requirements in Decision (EU) 2017/175 is provided in the tables below.

PC1 (o): Procurement of paper products

Existing requirements on the procurement of paper products from Decision (EU) 2017/175)
Criterion 51. Paper products (up to 2 points) *90% of the following categories of paper products used shall have been awarded the EU Ecolabel or other ISO Type I eco-labels (0.5 point each of the following categories, to a maximum of 2 points):* *a) Toilet paper* *b) Tissue paper* *c) Office paper* *d) Printed paper* *e) Converted paper (e.g. envelopes)* *Assessment and verification:* *The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2014/256/EU of 2 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for converted paper products (31) and/or Commission Decision 2012/481/EU of 16 August 2012 establishing the ecological criteria for the award of the EU Ecolabel for printed paper (32) and/or Commission Decision 2011/332/EU of 7 June 2011on establishing the ecological criteria for the award of the EU Ecolabel for copying and graphic paper(33) and/or Commission Decision 2009/568/EC of 9 July 2009 establishing the ecological criteria for the award of the Community Eco-label for tissue paper(34). Where other ISO type I label are used, applicant shall provide a copy of the type I label certificate or packaging label.*
Proposed criterion PC1 on the procurement of paper products in TR1
The applicant shall have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of at least 90% (by number of purchased units) of the following categories of paper products ~~used shall~~ that have been awarded the EU Ecolabel or other ISO Type I ecolabels (up to a combined maximum of 2.5X points): a) Toilet paper (0.5X points). b) Tissue paper (0.5X points). c) Office paper (0.5X points). d) Tourist guides or maps provided for free to guests~~Printed paper~~ (0.5X points). e) Envelopes (0.5X points). ~~Converted paper (e.g. envelopes)~~ f) Notepads (0.5X points). g) Paper carrier bags (0.5X points). Assessment and verification: The applicant shall provide data and documentation (including relevant invoices or procurement documents) indicating the quantities of such products purchased~~used~~ and the quantities that have an ISO Type I ecolabel. Where EU Ecolabel products are purchased~~used~~, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the following Decisions:

- Toilet paper, tissue paper, office paper: Decision (EU) 2019/70 or a newer version of criteria that repeals this Decision.
- Tourist guides, maps, envelopes, notepads and paper carrier bags: Decision (EU) 2020/1803 or a newer version of criteria that repeals this Decision.

~~Commission Decision 2014/256/EU of 2 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for converted paper products (31) and/or Commission Decision 2012/481/EU of 16 August 2012 establishing the ecological criteria for the award of the EU Ecolabel for printed paper (32) and/or Commission Decision 2011/332/EU of 7 June 2011on establishing the ecological criteria for the award of the EU Ecolabel for copying and graphic paper(33) and/or Commission Decision 2009/568/EC of 9 July 2009 establishing the ecological criteria for the award of the Community Eco-label for tissue paper(34).~~

Where other ISO Type I labels are used, the applicant shall provide a copy of the Type I label certificate or packaging label.

In cases where the items are not produced by the applicant (namely free maps and tourist guides provided by the local or regional tourist board), evidence from invoices or procurement documents shall not be required. Instead, a declaration from the tourist board should be provided, stating that the free maps and/or other tourist guides have been printed in accordance with relevant ecolabel criteria.

1426

1427 PC2 (o): Procurement of certain durable goods

Existing requirements relating to the procurement of durable goods from Decision (EU) 2017/175
Criterion 52. Durable goods (up to 4 points) *At least 40% (rounded to the next integer) of at least one of the following categories of durable goods (1 point for each category, to a maximum of 4 points):* *a) Bed-linen, towels and table clothes* *b) Computers* *c) Televisions* *d) Bed mattresses* *e) Furniture* *f) Vacuum cleaners* *g) Floor coverings* *h) Imaging equipment* *present in the tourist accommodation shall have been awarded the EU Ecolabel or other ISO Type I eco-labels.* *Assessment and verification:* *The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2014/350/EU of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products (35) and/or Commission Decision 2009/300/EC of 12 March 2009 establishing the revised ecological criteria for the award of the Community Eco-label to televisions (36) and/or Commission Decision 2014/391/EU of 23 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for bed mattresses (37) and/or Commission Decision on establishing the ecological criteria for the award of the Community eco-label for wooden furniture (38) and/or Commission Decision on establishing the ecological criteria for the award of the Community Ecolabel for wooden floor coverings(39) and/or Commission Decision 2009/607/EC of 9 July 2009 establishing the ecological criteria for the award of the Community eco-label to hard coverings (40). Where other ISO type I label are used, applicant shall provide a copy of the type I label certificate or packaging label.*
Proposed criterion PC2 on the procurement of certain durable goods in TR1
Note: Points between 0.1X and 0.5X shall be awarded in proportion to the share of award criterion granted to ISO Type I ecolabel products in procurement contracts (i.e. a 10% of purchase price award corresponds to 0.1X points and a 50% of purchase price award corresponds to 0.5X points). In cases where ISO Type I ecolabels are mandated directly in technical specifications, 0.5X points shall be awarded.

The tourist accommodation establishment shall have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of products that have been awarded the EU Ecolabel or another ISO Type I ecolabel in ~~At least 40 (rounded to the next integer) of~~ at least one of the following categories of durable goods listed below. (~~X point for each category, up~~ to a combined maximum of 2X points):

a) Bed-linen.
b) Towels.
~~b) Computers~~
~~c) Televisions~~
~~d~~c) Bed mattresses.
~~e~~d) Furniture.
~~f) Vacuum cleaners~~
~~g~~e) Wood-, cork- or bamboo-based floor coverings
f) Hard ~~F~~floor coverings.
~~h) Imaging equipment~~

~~present in the tourist accommodation shall have been awarded the EU Ecolabel or other ISO Type I eco-labels.~~

Assessment and verification: The applicant shall provide a copy of the procurement documentation ~~data and documentation~~ indicating the relevant technical specifications and/or award criteria specifying the demand for any one or more of relevant ISO Type I ecolabels~~quantities of such products owned and the quantities that have a ecolabel~~.

Where EU Ecolabel products are specified and procured~~used~~, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label, ~~showing~~confirming that it was awarded in accordance with:

- Bed-linen or towels: Decision 2014/350/EU or a newer version of criteria that repeals this Decision.
- Bed mattresses: Decision 2014/391/EU or a newer version of criteria that repeals this Decision.
- Furniture: Decision 2016/1332/EU or a newer version of criteria that repeals this Decision.
- Wood-, cork- or bamboo-based floor coverings: Decision (EU) 2017/176 or a newer version of criteria that repeals this Decision.
- Hard covering products: Decision (EU) 2021/476 or a newer version of criteria that repeals this Decision.

~~the Commission Decision 2014/350/EU of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products (35) and/or Commission Decision 2009/300/EC of 12 March 2009 establishing the revised ecological criteria for the award of the Community Eco-label to televisions (36) and/or Commission Decision 2014/391/EU of 23 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for bed mattresses (37) and/or Commission Decision on establishing the ecological criteria for the award of the Community eco-label for wooden furniture (38) and/or Commission Decision on establishing the ecological criteria for the award of the Community Ecolabel for wooden floor coverings(39) and/or Commission Decision 2009/607/EC of 9 July 2009 establishing the ecological criteria for the award of the Community eco-label to hard coverings (40).~~

Where other ISO type I labels are specified and procured~~used~~, the applicant shall provide a copy of the Type I label certificate or packaging label.

1428 PC3 (o): Procurement of detergents and toiletries

Existing requirements on the procurement of detergents and toiletries from Decision (EU) 2017/175
Criterion 54. Detergents and toiletries procurement (up to 2 points) *At least 80% purchased volume or weight of at least one of the following detergent and toiletry categories (0.5 points each category, to a maximum of 2 points):* *a) hand dishwashing detergents* *b) detergents for dishwashers* *c) laundry detergent* *d) all purpose cleaners* *e) sanitary detergents* *f) soaps and shampoos*

g) hair conditioner

used by the tourist accommodation shall have been awarded the EU Ecolabel or other ISO Type I eco-labels.

Assessment and verification:

The applicant shall provide data and documentation indicating the quantities of such products owned and the quantities that have an eco-label. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the Commission Decision 2011/382/EU on establishing the ecological criteria for the award of the EU Ecolabel to hand dishwashing detergents (41) and/or Commission Decision 2011/263/EU of 28 April 2011 on establishing the ecological criteria for the award of the EU Ecolabel to detergents for dishwashers (42) and/or Commission Decision 2011/264/EU of 28 April 2011 on establishing the ecological criteria for the award of the EU Ecolabel for laundry detergents (43) and/or Commission Decision 2011/383/EU of 28 June 2011 on establishing the ecological criteria for the award of the EU Ecolabel to all-purpose cleaners and sanitary cleaners (44) and/or Commission Decision 2014/893/EU of 9 December 2014 establishing the ecological criteria for the award of the EU Ecolabel for rinse-off cosmetic products(45). Where other ISO type I label are used, the applicant shall provide a copy of the type I label certificate or packaging label.

Proposed criterion PC3 on the procurement of detergents and toiletries in TR1

The tourist accommodation establishment shall have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of at least ~~80%~~50% (by volume of purchased units) of the following categories of detergent products and toiletries that have been awarded the EU Ecolabel or other ISO Type I ecolabels (up to a combined maximum of 5X points):

a) Hand dishwashing detergent (0.5X points).
b) Dishwasher detergent (0.5X points).
c) Laundry detergent (0.5X points).
d) All purpose cleaners / floor cleaners (0.5X points).
e) Glass cleaner (0.5X points).
f) Kitchen cleaner/degreaser (0.5X points).
g) W/C gels (0.5X points).
h) Hand soap (0.5X points).
i) Shower gel (0.5X points).
j) Shampoo (0.5X points).
k) Hair conditioner (0.5X points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices or procurement documents) indicating the quantities of such products purchased and the quantities that have an ISO Type I ecolabel.

Where EU Ecolabel products are purchased, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the following Decisions:

- Hand dishwashing detergent: Decision (EU) 2017/1214 or a newer version of criteria that repeals this Decision.
- Dishwasher detergent: Decision (EU) 2017/1215, or Decision (EU) 2017/1216, or newer versions of criteria that repeal these Decisions.
- Laundry detergent: Decision (EU) 2017/1218, or Decision (EU) 2017/1219, or newer versions of criteria that repeal these Decisions.
- All purpose cleaners, floor cleaners, glass cleaners, kitchen cleaners, W/C gels: Decision (EU) 2017/1217, or a newer version of criteria that repeals this Decision.
- Hand soaps, shower gels, shampoos, hair conditioners: Decision (EU) 2023/1870.

Where other ISO Type I labels are used, the applicant shall provide a copy of the Type I label certificate or packaging label.

PC4 (o): De-icing

Existing requirements on de-icing from Decision (EU) 2017/175

Criterion 56. De-icing *Where de-icing of roads is needed and is carried by the accommodation provider, mechanical means, sand/gravel or de-icers that have been awarded a ISO Type I eco-label shall be used in order to make roads on the tourist accommodation ground safe in case of ice/snow.* *Assessment and verification:* *The applicant shall provide a detailed explanation of how the tourist accommodation fulfils this criterion, together with appropriate supporting documentation. When de-icers that have been awarded an ISO Type I eco-label are used, the applicant shall provide a copy of the product label certificate and/or packaging label.*
Proposed criterion PC4 on de-icing in TR1
No changes are proposed.

1431

1432 ## PC5 (o): Local and organic food and beverage products

Existing requirements relating to local and organic food products from Decision (EU) 2017/175
Criterion 65. Local and organic products (up to 4 points) *a) At least two locally sourced and not out of season (for fresh fruit and vegetables) food products shall be offered at each meal including breakfast (1 point)* *b) The tourist accommodation actively chooses local suppliers of goods and services (1 point)* *c) At least 2 products (1 point) or 4 products (2 points) used in daily meal preparation and/or sold in the shop shall have been produced by organic farming methods, as laid down in Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products (46) (1 point)* *For the purpose of this criterion local means within a 160 kilometres radius of the tourist accommodation.* *Assessment and verification:* *The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. Where organic products are used, the applicant shall provide a copy of the product certificate or packaging label showing that it was awarded in accordance with the Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products (47). In some countries, it is possible for restaurants and hotels to be awarded by some labelling schemes when they use only organic products. Where a tourist accommodation is awarded by these types of schemes (or similar) this information could be provided as evidence of compliance with this criterion.*
Proposed criterion PC5: Local and organic food and beverage products
No changes proposed, but to be discussed about how to assess and verify "locality" and "seasonality".

1433

1434 ## PC6 (o): Procurement of professional laundry services

Existing requirements relating to ecolabelled services from Decision (EU) 2017/175
Criterion 25. Ecolabelled services (up to 4 points) *All outsourced laundry and/or cleaning is carried out by a provider who has been awarded an ISO Type I label (2 points for each service, to a maximum of 4 points).* *Assessment and verification* *The applicant shall provide appropriate evidence of ISO Type I certification by laundry and/or cleaning suppliers.*
Proposed criterion (PC6 (o)) on professional laundry services in TR1

Note: Up to X points shall be awarded under this criterion. If the tourist accommodation establishment is located in a river basin subjected to seasonal water stress (see the 6th point in the description requirement under the general assessment and verification text), up to 3X points shall be awarded. Points shall be determined in proportion to the share of total laundry load (kg or tonnes) that is laundered in accordance with this criterion.

The water consumption of laundry services shall be reduced by the use of a professional laundry service that uses continuous batch washers. To qualify, the professional laundry service installation must be located within a 100km radius of the tourist accommodation.

Assessment and verification: In cases where points are being claimed under this criterion and regarding the first point, the applicant shall provide a declaration of compliance, also defining the name and location of the professional laundry service to where laundry is sent for cleaning and the approximate distance between the two places. This declaration shall be supported by a declaration from the laundry service provider briefly describing the laundry system(s) and confirming the use of continuous batch washes and/or their ecolabel certification.

PC7 (o): Procurement of ecolabelled indoor cleaning services

Existing requirements relating to ecolabelled services from Decision (EU) 2017/175
Criterion 25. Ecolabelled services (up to 4 points) *All outsourced laundry and/or cleaning is carried out by a provider who has been awarded an ISO Type I label (2 points for each service, to a maximum of 4 points).* *Assessment and verification* *The applicant shall provide appropriate evidence of ISO Type I certification by laundry and/or cleaning suppliers.*
Proposed criterion (PC7 (o)) on ecolabelled indoor cleaning services in TR1
The tourist accommodation establishment shall have contracted an indoor cleaning service for the provision of routine professional cleaning operations. Examples of relevant cleaning operations include, but are not limited to: floor cleaning, window cleaning and bathroom cleaning. (X points). Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance, supported by a copy of the cleaning service contract with the ecolabelled cleaning service provider. The specific name of the provider and a copy of their EU ecolabel certification shall be provided. The cleaning service provider shall also declare that they are compliant with Decision (EU) 2018/680, or a newer version of the criteria that repeals this Decision. Where other ISO type I labels are contracted, the applicant shall provide a copy of their Type I label certificate or contract and a declaration from them about their ecolabelled status.

Rationale for Theme 5

This new theme titled "procurement and consumables" is mostly centred on requirements that involve the procurement of products and services that are relevant to tourist accommodation services but which can also be ecolabelled. With regards to the procurement of goods, this is an ongoing

commitment that is demonstrated with every procurement exercise. Procurement could be via long term supply contracts or regular one-off bulk purchases. With regards to the procurement of services, the service contract needs to be in vigour for points to be awarded.

Regarding PC1, the requirements are broadly similar to those in Decision (EU) 2017/175, but many details have been added or updated. All references to EU Ecolabel Decisions were out of date. This leads to questions about whether the successful uptake of ecolabel toilet paper, tissue paper and office paper is taking into account the new criteria or not. Much poorer uptake of printed paper and converted paper products was observed. Therefore instead of generally referring to these rather broad product groups, reference was made to specific products that are most likely to appear in a tourist accommodation establishment – namely tourist guides, maps, envelopes, notepads and paper bags. Most of these products could be procured with the logo of the applicant enterprise. In the case of guides and maps, it would be up to the local or regional tourism board to opt for EU Ecolabel maps and guides. Such an approach would help raise awareness of the EU Ecolabel amongst both tourists and tourist accommodation establishments. The EU Ecolabel builds upon very important sustainable forest management principles set out by schemes such as FSC and PEFC, but also adds requirements relating to energy consumption, emission of pollutants to air and water, and restrictions on hazardous substances.

Regarding PC2, the points referring to ecolabelled computers, televisions, vacuum cleaners and imaging equipment have been removed due to a combination of poor uptake and the fact that there is currently no EU Ecolabel criteria for these products. The requirements on bed-linen and towels have been separated since these could be different suppliers, even though they are covered by the same EU Ecolabel Decision. The requirements on floor coverings have been explained in more detail and put into separate points, because they refer to different EU Ecolabel Decisions.

Due to potential difficulties in finding relevant products in procurement exercises, a different approach is promoted here than in PC1. In PC2, points are awarded just for trying to make EU Ecolabel products more competitive in the market by offering award criteria. In cases where the applicant insists on procuring such products, the maximum points are applicable.

Regarding PC3, the approach has generally been maintained, but the percentage share of ecolabelled products has been lowered to encourage better uptake. The list of hard surface cleaners has been extended to include W/C gels, kitchen cleaners and glass cleaners. In the assessment and verification text, it is further clarified that the dishwasher detergents and laundry detergents apply as much to professional products as to household products.

Regarding PC4 and PC5, the requirements are maintained as set out in Decision (EU) 2017/175. However, on PC5, further clarity is needed about how to consistently define what constitutes a local food product (is it the point of cultivation?) and whether or not if traceability to the farm of origin is possible. To illustrate the point, a comparison of the definition of "local" in different ecolabel schemes is shown below.

Table 12. Other ecolabels measure for locally sourced products (EU Ecolabel states 160km)

Ecolabel	Distance considered for local products
Nordic Swan	250km (*For companies north of 62°N, the limit is 500 km)*
Austrian Ecolabel	150km
The Green Key	100 km
Green sign	100km

Regarding seasonality, this is a concept that can vary significantly from the North to the South of Europe. This is important if products must be both local and seasonal at the same time. Proper documentation and procedures also contribute to cost savings and support the broader objectives of ecolabelling.

Regarding PC6 and PC7, these requirements relate to the procurement of ecolabelled services originally set out in criterion 25. Relatively more points are allocated to the professional laundry services than indoor cleaning services, due to the fact that the former offer not just the use of less environmentally harmful chemicals, but also major savings in energy, water, and also in detergent consumption, which will always be optimised for cost competitivity. Indoor cleaning services are unlikely to be the day-to-day household cleaning of occupied rooms, but to focus on more periodical tasks such as window cleaning and communal floor cleaning.

Table 13. *Comparison of ecolabel schemes on requirements on procurement and consumables*

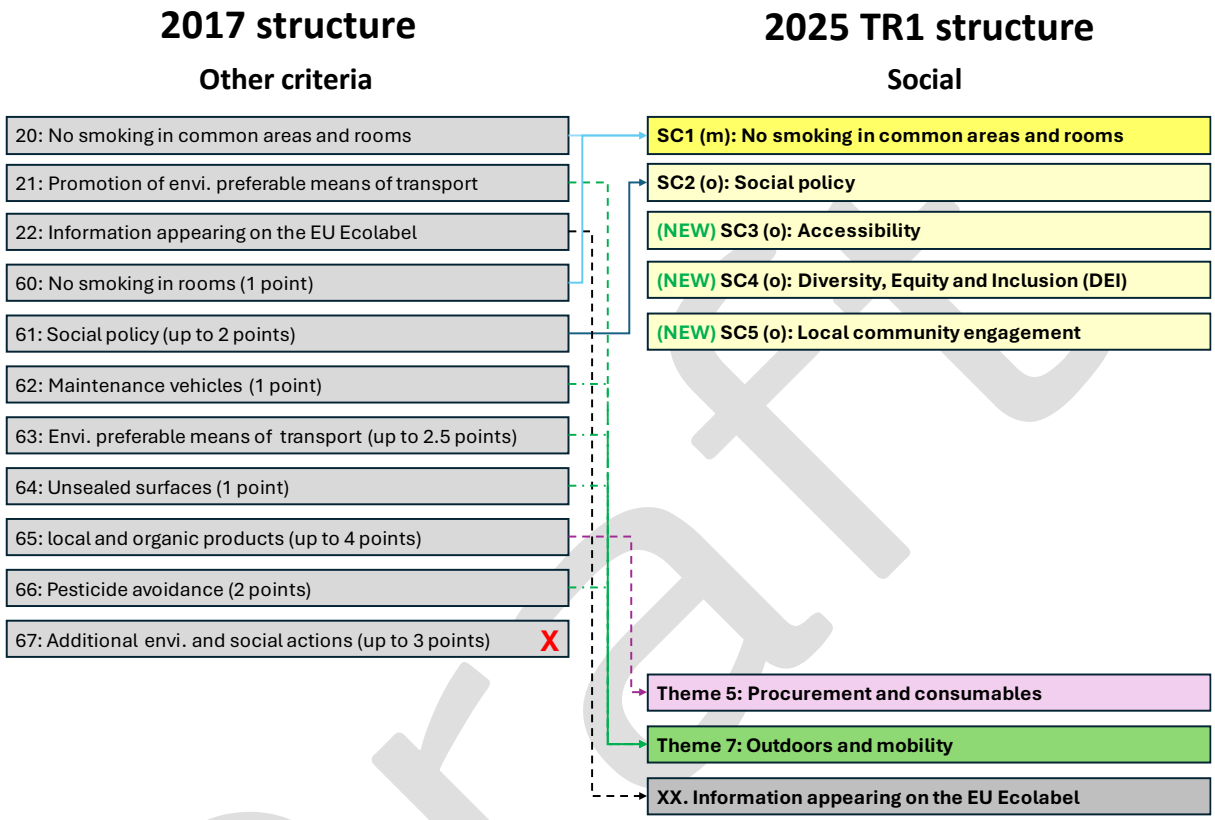
Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
PC1(o): Paper products	Related to O43	Related to B03-B05	Related to 13.2	Related to 4.11
PC2(o): Certain durable goods	Related to P6	Related to G20	Related to 13.8	Related to 6.4 and 6.20
PC3(o): Procurement of detergents and toiletries	Related to O35-O37, O39	Related to R03	Related to 5.3 c	Related to 3.7
PC4(o): De-icing	Related to O38	Related to R10	Related to 5.8	
PC5(o): Local and organic products		Related to R16		
PC6(o): Professional laundry services	Related to P5	Related to R08	Related to 13.7 and indirectly to 4.9	Related to 6.3
PC7(o): Professional cleaning services	Related to P6	Related to R08		

Source: As per the links in the header row of the table.

Theme 6: Social

A comparison of the individual criterion headings in the 2017 criteria and the TR1 proposals under the theme of "Social" is illustrated below.

Figure 12. Comparison of existing social criteria with TR1 proposal



Source: Own elaboration

Regarding criteria structure, there is now a theme dedicated only to social criteria. Such an approach was considered as justifiable because: (i) there were many social-related requirements already laid out in Decision (EU) 2017/175; (ii) workers in the tourist accommodation sector are often on seasonal contracts and at risk of exploitation, and (iii) other ecolabels often make reference to social criteria, following the recommendations of the Global Sustainability Tourism Council.

The two criteria on smoking restrictions (Nos 20 and 60) have been combined into a single mandatory restriction (SC1). Many of the original "other" criteria (Nos 21, 62, 63, 64 and 66) have been transferred to a new theme on "outdoors and mobility".

Criteria on Accessibility; Diversity, Equity, and Inclusion (DEI); and Local Community Engagement have been added to reflect core social priorities in hospitality. Accessibility ensures equitable access and respectful service for guests with disabilities. DEI fosters fair, safe workplaces through anti-harassment and non-discrimination measures, parental support, and transparent advancement practices. Local Community Engagement strengthens relationships with neighbours and local organisations through local hiring and skills development, partnerships with cultural practitioners, and ongoing support for charitable or social enterprises. Together, the six criteria align social performance with established norms and good practice, and help accommodations deliver safer, more inclusive, and community-connected hospitality.

These new additions render the original criterion 67 obsolete. This criterion was effectively a placeholder for additional social (and environmental) actions at the tourist accommodation establishment. However, it is preferred to stick to more specific and defined requirements wherever possible. For these reasons, criterion 67 has been removed.

Regarding anonymised licence holder data, a review of points awarded to 43 different licences were provided by CBs. The table below presents an overview of where points were awarded and which optional energy criteria were being complied with.

Table 14. Points awarded to optional "other" criteria

	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. / Max.	With points	Avg. / Max.	With points	Avg. / Max.
60: No smoking in rooms.	20 of 20	1/1	3 of 3	1/1	20 of 20	1/1
61a): Time off for education	10 of 20	0.5/0.5	0 of 3	n/a	11 of 20	0.5/0.5
61b): Free meals or meal vouchers	6 of 20	0.5/0.5	1 of 3	0.5/0.5	9 of 20	0.5/0.5
61c): Free uniforms and work wear	13 of 20	0.5/0.5	1 of 3	0.5/0.5	11 of 20	0.5/0.5
61d): Staff discounts	11 of 20	0.5/0.5	0 of 3	n/a	9 of 20	0.5/0.5
61e): Subsidised sustainable transport	5 of 20	0.5/0.5	1 of 3	0.5/0.5	6 of 20	0.5/0.5
61f): Caution to get a house loan	1 of 20	0.5/0.5	0 of 3	n/a	2 of 20	0.5/0.5
67b): Additional social actions	8 of 20	0.81/1	0 of 3	n/a	7 of 20	0.93/1
Average points awarded for "social" criteria		2.48		1.50		2.50

Source: Anonymised data provided by competent bodies

The data provided by competent bodies also included a distinction based on the nature of the tourist accommodation in line with the options that can be filtered on the EU Ecolabel tourist accommodation catalogue ([27]). The data could be split into hotels, cottages and campsites, which more or less aligns with the proposals for annexes I, II and III in TR1.

Insights are limited because the data provided (n=43) represents less than 5% of the total EU Ecolabel licenced tourist accommodation. The very low number of datasets for cottages (n=3) makes it difficult to draw any meaningful conclusion on that data.

Most of the optional requirements relating to "other" had a moderate or high degree of uptake by the licence holders for which data was shared. The most popular requirements were no smoking (No. 60, 43 out of 43), pesticide avoidance (No. 66 and 33 out of 43), and "additional environmental actions" (No. 67a) and 34 out of 43).

The provision of electric vehicles for guest pick-up (No. 63a)i) and 8 out of 43), and ensuring a "caution" to help staff obtain a house loan (No 61f) and 3 out of 43) were the two criteria with the lowest uptake. It is also interesting to note that the "local" requirements had a reasonable uptake here, unlike the earlier "local" requirement for EMAS or ISO certification of suppliers in criterion 24.

A comparison of the TR1 proposals with any existing requirements in Decision (EU) 2017/175 is provided in the tables below.

[27] The EU Ecolabel tourist accommodation catalogue can be found here at this link.

SC1 (m): No smoking in common areas and rooms

Existing requirement on no smoking in common areas and rooms from Decision (EU) 2017/175)
Criterion 20: No smoking in common areas and rooms *a) No smoking shall be allowed in any indoor common areas.* *b) No smoking shall be allowed in at least 80% of guests' rooms or rental accommodations (rounded to the next integer).* *Assessment and verification:* *The applicant shall provide a declaration of compliance with* *Proposal for criterion 20: No smoking in common areas and rooms* *this criterion and documentary evidence such as pictures of the signs displayed inside the tourist accommodation. The applicant shall indicate the number of guests' rooms and shall indicate which of these are non-smoking.* *Criterion 60: No smoking in rooms* No smoking shall be allowed in guests' rooms or rental accommodations. *Assessment and verification:* *The applicant shall provide a declaration of compliance with this criterion and documentary evidence such as pictures of the signs displayed inside the rooms or rental accommodations.*
Proposed criterion (SC1(m))on No smoking in common areas and rooms inTR1
a) No smoking, including e-cigarettes, shall be allowed in any indoor common areas and rooms ~~b) No smoking shall be allowed in at least 80% of guests' rooms or rental accommodations (rounded to the next integer).~~ Designated smoking areas located at least 7.5 meters (or the maximum extent allowable by local codes) from all entries, outdoor air intakes, and operable windows shall be provided. *Assessment and verification: The applicant shall provide a declaration of compliance with* *~~Proposal for criterion 20: No smoking in common areas and rooms~~ this criterion and documentary evidence such as pictures of the signs displayed inside the tourist accommodation. The applicant shall indicate the designated smoking area and provide documentary evidence such as pictures of the area and that the distance from any open to the accommodation is respected. ~~number of guests' rooms and shall indicate which of these are non-smoking.~~*

SC2 (o): Social policy

Existing requirement on social policy from Decision (EU) 2017/175)
Criterion 61: Social policy *Tourist accommodation shall have a written social policy to ensure at least one of the following social benefits (subject to national taxes) for staff (0.5 point for each benefit, to a maximum of 2 points):* *a) Time off for education* *b) Free meals or meal vouchers.* *c) Free uniforms and work wear* *d) Discount on products/ services in the tourist accommodation,* *e) Subsidised sustainable transport scheme* *f) Caution to get house loan* *Written social policy shall be updated and communicated to staff yearly. Staff shall sign the written policy at the communication session. The document shall be available at reception to all staff.* *Assessment and verification:* *The applicant shall provide a copy of the written social policy duly signed by staff and self-declaration explaining how the above requirements are met. In addition, the competent body may ask for documentary evidence and/or direct random staff interview during the on-site visit.*

Proposed criterion (SC2(o)) on social policy in TR1
Tourist accommodation shall have a written social policy to ensure at least ~~one~~ two of the following social benefits (subject to national taxes) for staff (X point for each benefit, to a maximum of X points): a) Time off for education b) Free meals or meal vouchers. c) Free uniforms and work wear d) Discount on products/ services in the tourist accommodation, e) Subsidised sustainable transport scheme f) Caution to get house loan Written social policy shall be updated and communicated to staff yearly. Staff shall sign the written policy at the communication session. The document shall be available at reception to all staff. *Assessment and verification: The applicant shall provide a copy of the written social policy duly signed by staff and self-declaration explaining how the above requirements are met. In addition, the competent body may ask for documentary evidence and/or direct random staff interview during the on-site visit.*

1547

1548 SC3 (o): Accessibility

Existing criterion on accessibility (in Decision (EU) 2017/175)
No existing requirements.
Proposed criterion (SC3(o)) on accessibility in TR1
Tourist accommodation shall be accessible for those with disabilities (X point for each benefit, to a maximum of X points): a) Step-free access, where not feasible provide an alternate accessible route that starts and terminates at the same location. b) At least 5% of the rooms and bathrooms are accessible, c) tactile/visual wayfinding on principal routes, d) accessible information and booking; e) staff trained in disability etiquette (align with ISO 21902). Assessment and verification: The applicant shall provide a declaration of compliance with this criterion and submit the following evidence: (a) documentation demonstrating a continuous step-free access route from arrival to reception and principal common areas or, where infeasible, an alternate accessible route connecting the same origin and destination; (b) evidence demonstrating the existence of accessible rooms and bathrooms; (c) images evidencing tactile/visual wayfinding on principal guest routes; (d) screenshots of the public website and booking engine showing accurate, specific accessibility information and that accessible rooms are identifiable and reservable; and (e) training materials confirming that relevant staff are trained in disability etiquette aligned with ISO 21902.

1549

1550 SC4 (o): Diversity, Equity, and Inclusion (DEI)

Existing criterion on Diversity, Equity and Inclusion (DEI) (in Decision (EU) 2017/175)
No existing requirements.
Proposed criterion (SC4(o)) on Diversity, Equity, and Inclusion (DEI) in TR1
The touristic accommodation shall pursue a Diversity, Equity and Inclusion (DEI) strategy ensuring at least two of the following actions (X point each up to X points):

a) Implementation of gender-safe workplace via an anti-harassment and non-discrimination policy covering all staff (including temporary and outsourced)
b) Parental leave policy that is fully aligned with applicable legal requirements and, where feasible, provides benefits that meet or exceed those requirements for all parents.
c) Provide childcare support through on-site childcare options or formal agreements with external providers and/or implement work scheduling practices that reasonably accommodate employees' childcare obligations.
d) Employment and professional integration of people with disabilities and older workers (50+), implementing measures beyond legal obligations, including accessible recruitment and skills development pathways.
e) Maintaining an international, multilingual, and multicultural team
f) Consideration of holidays of recognised religious communities not otherwise enshrined in law.
g) DEI strategy statement outlining scope, responsibilities, dates of implementation, and evidence of communication to staff (including temporary and outsourced workers where applicable).

Assessment and verification: The applicant shall submit a declaration of compliance identifying which actions (a–g) are implemented: (a) a published anti-harassment and non-discrimination policy; (b) the parental-leave policy demonstrating full legal alignment and any benefits exceeding statutory minimums; (c) evidence of childcare support (e.g., on-site provision or agreements/subsidies with external providers); (d) integrated evidence for the employment and professional integration of people with disabilities and older workers (50+) and skills-development pathways; (e) a summary of workforce composition presenting the multilingual and multicultural team; (f) documented leave or scheduling arrangements reflecting recognised religious holidays not enshrined in law; (g), provide the DEI strategy with clear description of the scope, implementation steps, and outcomes supported by KPIs or qualitative results.

SC5 (o): Local community engagement

Existing requirement on local community engagement from Decision (EU) 2017/175)
No existing requirements
Proposal criterion (SC5(o)) on local community engagement in TR1
The accommodation shall implement a local community engagement program covering at least one of the following domains (X point each, up to X point), with defined objectives, responsibilities, and annual review: a) Set clear targets to hire local people, b) keep active partnerships with locals (e.g. artists, guides, cultural groups, etc.) c) Provide support for charitable organisations or social enterprises in the local area (e.g., financial contributions, in-kind support, staff volunteering), aligned with community needs *Assessment and verification: The applicant shall submit a declaration of compliance identifying which actions are implemented.*

Rationale for Theme 6

Table 15. Comparison of ecolabel schemes on social criteria

Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
SC1 (m): No smoking in common areas and rooms		Related to L01and L03	Related to 9.1-9.3	

Proposed criterion	Nordic Swan (link here)	Austrian ecolabel (link here)	Green Key (link here)	GreenSign (link here)
SC2 (o): Social policy (up to 2 points)		Related to M17, M21, M25		Partially related to 1.2, 9.4, 9.6-9.8, 9.11
SC3 (o): Additional social actions (up to 1 point)				
SC4 (o): Accessibility (up to 2 points)		Related to G02, G11	Related to 11.4	Related to 7.11
SC5 (o): Diversity, Equity, and Inclusion (DEI) (up to 2 points)		Related to M19, M20,	Related to 11.5	Related to 9.10, 9.12
SC6 (o): Local community engagement (up to 1 point)	Partially related to P4	Related to M27 and M29	Related to 11.6 and 11.7	Related to 5.7, 7.1, 7.3-7-6, 7.12-7.15, 9.2, 9.5

Source: As per the links in the header row of the table.

Regarding SC1, smoking is not permitted in communal indoor spaces and guest rooms. To accommodate guests who smoke, hotels are now required to provide a designated smoking area. This area must be located at least 7.5 metres away from any openable entrance to the hotel, following standards found in building certifications such as LEED. This distance ensures that smoke from the designated area cannot enter the building through doors, windows, or ventilation systems.

These measures are crucial for protecting the health and well-being of guests and staff. Non-smoke-free accommodations put non-smoking guests and employees at risk of passive smoking. By enforcing comprehensive no-smoking policies and providing clearly separated smoking areas, hotels can significantly improve indoor air quality, safeguard public health, and offer a more comfortable and inclusive environment for all.

SC2: The criterion has been strengthened to require at least two measures to be achieved in order to earn the point. It increases accommodation commitment by ensuring that staff benefits are not isolated or symbolic, but part of a broader, lived social policy that reaches different aspects of employee well-being.

SC3: Accessibility is a fundamental aspect of equitable and high-quality tourism, and a key social pillar of sustainability. Many travellers experience permanent, temporary, or situational impairments, and without reliable and user-friendly access, accommodation options effectively become inaccessible to them.

Ensuring accessibility aligns with EU non-discrimination commitments and the UN CRPD ([28]), improves safety in daily operations and emergencies, reduces mis-selling and complaint risks, and broadens market reach. These measures also embody universal design, benefiting older adults, families with strollers, and guests recovering from injury. Providing step-free access, or a clearly

[28] Convention on the Rights of Persons with Disabilities (CRPD), more information available at this link.

signposted alternative route, enables independent movement from arrival to reception and main areas, reduces reliance on staff, and ensures safe evacuation.

Designating at least 5% of rooms and bathrooms as accessible helps ensure availability across occupancy levels and room types as well ensuring true usability. Including accessible bathrooms is especially important for functional access. While clear tactile and visual wayfinding along principal routes supports guests with low vision or cognitive disabilities, reduces stress, and assists with evacuation. Offering accurate accessible information and booking options allows guests to verify features in advance and reserve the rooms they need, preventing wasted journeys and reducing legal and reputational risks. Staff training in disability etiquette, aligned with ISO 21902, ensures that accessible features are supported by consistent and respectful service.

SC5: A Diversity, Equity and Inclusion (DEI) criterion is necessary because inclusive, fair workplaces and services are core to sustainable, high-quality hospitality. Embedding DEI improves recruitment and retention, strengthens guest satisfaction, and reduces operational risk. It also aligns accommodation services with international norms on non-discrimination and decent work while expanding market reach by welcoming diverse staff and guests.

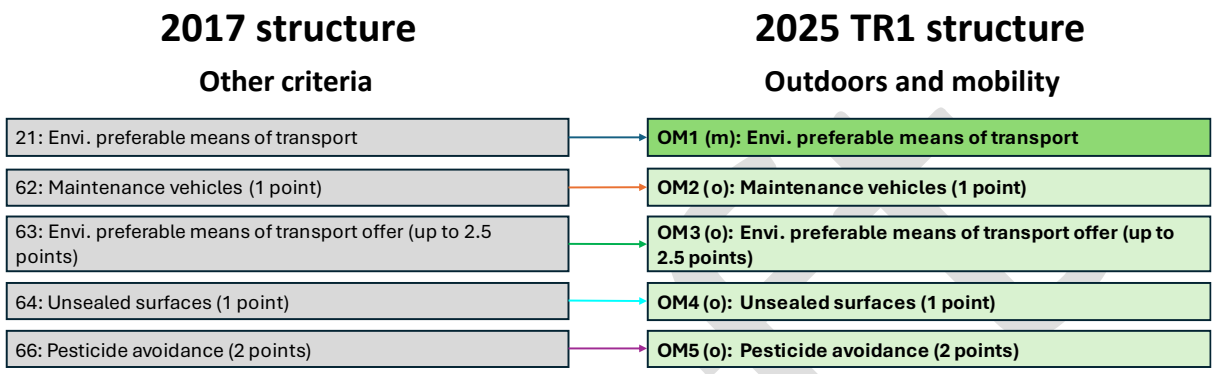
The proposed actions are important because each one removes a practical barrier to equity and embeds everyday fairness in operations. An anti-harassment and non-discrimination policy for all staff (including temporary and outsourced) creates a gender-safe baseline and ensures grievances can be raised without retaliation. Parental leave aligned with, and where feasible exceeding, legal requirements promote equal career continuity for all parents, while childcare support and family-aware scheduling translate policy intent into daily practice. Proactive employment and professional integration of people with disabilities and older workers (50+) goes beyond minimum legal quotas to unlock overlooked talent and signal equal opportunity in hiring, accommodation, and skills development. Maintaining international, multilingual and multicultural teams and acknowledging recognised religious holidays not set in law supports inclusive service quality and equitable internal culture. Finally, a written DEI strategy with scope, responsibilities and timelines turns good intentions into accountable, auditable management.

SC6: Local community engagement is a necessary social pillar for sustainable hospitality because accommodations operate within living communities and draw on local talent, culture, and infrastructure. Setting targets to hire local people strengthens the local economy and improves employee retention; maintaining active partnerships with local cultural practitioners preserves and celebrates cultural heritage while enriching the guest experience; and providing support for charitable organisations or social enterprises aligns operations with community needs and builds trust.

Theme 7: Outdoors and mobility

A comparison of the individual criterion headings in the 2017 criteria and the TR1 proposals under the theme of "Social" is illustrated below.

Figure 13. Comparison of existing Outdoors and mobility criteria with TR1 proposal



Source: Own elaboration

Regarding anonymised licence holder data, a review of points awarded to 43 different licences were provided by CBs. The table below presents an overview of where points were awarded and which optional energy criteria were being complied with.

Table 16. Points awarded to optional "other" criteria

	Campsites (n=20)		Cottages (n=3)		Hotels (n=20)	
	With points	Avg. / Max.	With points	Avg. / Max.	With points	Avg. / Max.
62: Maintenance vehicles	14 of 20	1/1	0 of 3	n/a	7 of 20	1/1
63a)i): Electric vehicles for transport	5 of 20	1/1	0 of 3	n/a	3 of 20	1/1
63a)ii): Charging stations for electric vehicles	12 of 20	1/1	1 of 3	1/1	8 of 20	1/1
63a)iii): Minimum number of bicycles	8 of 20	1/1	2 of 3	1/1	7 of 20	1/1
63b): Partnership with bicycle provider(s)	9 of 20	0.5/0.5	0 of 3	n/a	9 of 20	0.5/0.5
64: Unsealed surfaces	16 of 20	1/1	3 of 3	1/1	11 of 20	1/1
66: Pesticide avoidance	17 of 20	2/2	2 of 3	2/2	14 of 20	2/2
Average points awarded for "other"		5.53		5.33		6.50

Source: Anonymised data provided by competent bodies

The data provided by competent bodies also included a distinction based on the nature of the tourist accommodation in line with the options that can be filtered on the EU Ecolabel tourist accommodation catalogue ([29]). The data could be split into hotels, cottages and campsites, which more or less aligns with the proposals for annexes I, II and III in TR1.

Insights are limited because the data provided (n=43) represents less than 5% of the total EU Ecolabel licenced tourist accommodation. The very low number of datasets for cottages (n=3) makes it difficult to draw any meaningful conclusion on that data.

[29] The EU Ecolabel tourist accommodation catalogue can be found here at this link.

Most of the optional requirements relating to the theme of "outdoors and mobility" had a moderate or high degree of uptake by the licence holders for which data was shared. The most popular requirements were pesticide avoidance (33 of 43), and unsealed surfaces (30 of 43).

The requirements relating to mobility showed reasonable uptake but also room for further improvement.

All of the criteria under theme 7 are as set in Decision (EU) 2017/175 and are flagged for stakeholder commenting and input before further development in TR2.

4. Annex II: Criteria proposals and rationale

As described in the scope, Annex II corresponds to "*Tourist accommodation in small hotels, holiday and other short-term rentals".*

Please note that all optional criteria proposals have "X points" denoted. This indicates that the exact number of points to allocate has not yet been considered, since it will first be necessary to have a settled number of optional criteria before deciding on the precise distribution of points. In some cases, different multiples of X are indicated in the same criterion. This is simply to indicate the relative importance or weighting of those specific parts of that criterion.

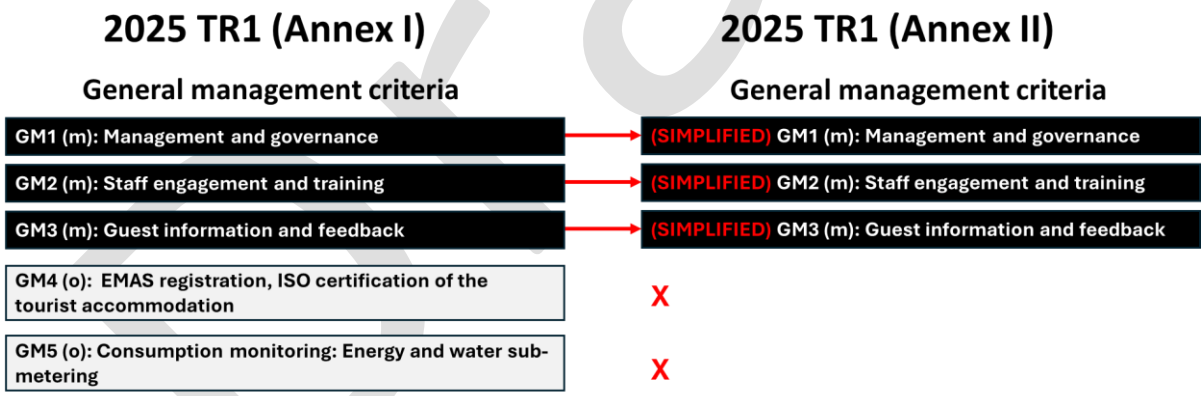
In order to keep TR1 concise, only the differences between Annex I and Annex II proposals are explained here.

Overall, the adapted criteria for small hotels maintain the same environmental objectives but ensure that compliance is feasible and proportionate to reflect the smaller organisational scale and reduced staff layers.

Theme 1: General Management

The requirements in Annex II are effectively the same as for Annex I but with the differences illustrated below.

Figure 14. Comparison of the criteria requirements/structure for the general management theme for Annex I (large) and Annex II (small and medium) hotels, holiday homes and other short-term rentals.



In order to keep TR1 concise, only the differences between Annex I and Annex II proposals are explained here. Mandatory criteria in Annex I have been slightly adapted to the context of small and medium-sized hotels while the optional criteria in Annex I is proposed not to apply.

GM1 (m): Management and governance

Annex I proposal for GM1 (management and governance) in TR1
The tourist accommodation establishment shall have implemented and maintain an Environmental Management System (EMS) and have an appointed person to be responsible for all operational aspects of the EMS. The EMS shall include the following elements: (a) An environmental policy identifying the most relevant environmental aspects regarding energy, water, waste, and, where applicable, chemical use. This policy shall be communicated to staff and made publicly available to guests and other interested parties.

(b) A detailed action programme establishing measurable targets on performance for the identified environmental aspects. Targets shall be reviewed and updated at least every two years, taking into consideration the requirements of this EU Ecolabel Decision. Where relevant environmental aspects are not covered by the EU Ecolabel, targets shall preferably be based on environmental performance indicators and benchmarks of excellence defined in the EMAS Sectoral Reference Document (30) for the tourism sector.
(c) An internal evaluation process that enables reporting on at least the following data:

- Specific energy consumption (kWh/guest night and kWh/internal conditioned m² per year) (linked to EC1).
- Percentage of final electricity use supplied by onsite renewable generation (%) (linked to EC11).
- Water consumption per guest-night (litres/guest-night), including irrigation where relevant.
- Waste generation per guest-night (kg/guest-night), food waste shall be monitored separately.
- Consumption of chemical products for cleaning, dishwashing, laundry, sanitising, and other special processes (kg or litres/guest-night), specifying if they are reported as ready-to-use quantities or as undiluted quantities.
- Percentage of ISO Type I labelled products used under the applicable optional criteria.

The internal evaluation process shall include:

(i) Verification of compliance with targets defined in the action programme.
(ii) Logging and records of preventative maintenance checks for energy and water systems, including HVAC, refrigeration, plumbing, and irrigation, to ensure proper functioning and detect leaks (linked to EC3).
(iii) Assessment of corrective actions where targets are not met.
(iv) Consideration of feedback collected from guests (linked to GM3).

All information resulting from monitoring, maintenance and evaluation shall be made available for consultation by staff and guests.

Assessment and verification: The applicant shall provide a declaration of compliance, together with:
— a copy of the environmental policy,
— a copy of the action programme including measurable targets and data from the last year, if available, and
— within two years of the licence being awarded, the evaluation report, including tracking of compliance with targets, maintenance records, a record of any corrective actions taken (if needed) and a description of how guest feedback has been considered. Updated evaluation reports shall be submitted to the competent body every two years.
Applicants registered under EMAS or certified according to ISO 14001 shall be deemed to comply. In the case of ISO 14001 certification, a report summarising performances against the action programme targets.

Annex II proposal for GM1 (management and governance) in TR1

The small or medium-sized hotel shall have implemented and maintain an Environmental Management System (EMS) and shall appoint a person responsible for its implementation and operation.
The EMS shall include the following elements:
(a) An environmental policy identifying the most relevant environmental aspects of hotel operations, in particular energy, water, waste and, where applicable, chemical use.
(b) A documented action programme establishing measurable targets for the identified environmental aspects. Targets shall be reviewed and updated at least every two years, taking into account the requirements of this EU Ecolabel Decision. Where relevant environmental aspects are not covered by the EU Ecolabel criteria, targets shall preferably be based on indicators and benchmarks defined in the EMAS Sectoral Reference Document for the tourism sector.

[30] Commission Decision (EU) 2016/611 of 15 April 2016 on the reference document on best environmental management practice, sector environmental performance indicators and benchmarks of excellence for the tourism sector under Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS) (OJ L 104, 20.4.2016, p. 27).

(c) An internal evaluation process shall be carried out at least annually and shall enable reporting on the following data, as applicable:

- Specific energy consumption (kWh/guest-night and/or kWh/m² of conditioned floor area per year).
- Water consumption per guest-night (litres/guest-night), including irrigation where relevant.
- Waste generation per guest-night (kg/guest-night), with food waste monitored separately where food services are provided.
- Consumption of chemical products for cleaning, laundry, dishwashing and sanitising (kg or litres/guest-night).
- Percentage of ISO Type I ecolabelled products used under the applicable optional criteria.

The internal evaluation process shall include:
(i) Verification of compliance with the targets defined in the action programme.
(ii) Records of preventive maintenance checks for energy and water systems (e.g. HVAC, hot water systems and plumbing).
(iii) Identification of corrective actions where targets are not met.
(iv) Consideration of guest feedback.
All information resulting from monitoring and evaluation shall be made available to staff and guests upon request.

Assessment and verification:
The applicant shall provide a declaration of compliance, together with:
— a copy of the environmental policy;
— a copy of the action programme including targets and available monitoring data; and
— within two years of the licence being awarded, an evaluation report, updated every two years.
Applicants registered under EMAS or certified according to ISO 14001 shall be deemed to comply. In the case of ISO 14001 certification, a summary report on performance against the action programme targets shall be submitted.

1664 GM2 (m): Staff engagement and training

Annex I proposal for GM2 (staff engagement and training) in TR1
(a) The tourist accommodation shall provide information and training to all staff (including subcontracted external staff), including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. Staff training shall cover the following aspects: (i) the environmental policy and action programme of the accommodation and awareness of the EU Ecolabel; (ii) energy saving actions (e.g. use of eco-cycles in dishwashers and washing machines, lights, air conditioning, heating, appliances); (iii) water saving actions (e.g. use of eco-cycles in dishwashers and washing machines, leaks, sheet/towel changes, irrigation, pool procedures where relevant); (iv) chemical use minimisation and optimal detergent dosages for laundry and dishwashing (based on water hardness and soiling), correct dilutions for concentrated cleaning products, etc.; (v) waste reduction, separation and management of disposable items; (vi) operational measures to reduce environmental impact in daily activities; (vii) communication to guests on environmental practices and key behavioural messages (linked to GM3). (b) New staff shall receive training within 4 weeks of starting. All staff shall receive refresher training at least annually. Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and attendance and completion records. Evidence of refresher training and updates on operational measures shall be included.

Annex II proposal for GM2 (staff engagement and training) in TR1
(a) The small or medium-sized hotel shall provide information and training to staff, including external or subcontracted staff where relevant, to ensure the implementation of environmental measures and to raise awareness of environmentally responsible behaviour in line with the mandatory and applicable optional criteria of this EU Ecolabel. Training may be provided through written instructions, briefings or simple procedures appropriate to the size and organisation of the hotel. Staff training shall cover, as relevant to the hotel's operations: (i) the environmental policy and action programme of the hotel and basic awareness of the EU Ecolabel; (ii) energy-saving practices (e.g. lighting, heating and cooling, use of equipment and appliances); (iii) water-saving practices (e.g. housekeeping, laundry, leak reporting, towel and sheet change policies where relevant); (iv) appropriate use of chemical products, including correct dosages and dilution where applicable; (v) waste reduction and separation practices; (vi) day-to-day operational measures to reduce environmental impacts; (vii) key messages to be communicated to guests on environmental practices. (b) New staff shall receive environmental information or training within a reasonable period after starting work. Refresher training or updates shall be provided periodically, as needed, particularly when procedures or operational practices change. Assessment and verification: The applicant shall provide a declaration of compliance, together with a description of the training approach and examples of training materials used. Records of staff participation shall be kept available for inspection.

1665 GM3 (m): Guest information and feedback

Annex I proposal for GM3 (guest information and feedback) in TR1
(a)The tourist accommodation shall also provide information to the guests to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. That information shall be actively given to the guests in oral or written form at the reception or in-room and shall include, in particular, the following aspects: • environmental policy of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation; • energy saving actions in relation to lights, air conditioning and heating systems when the guests leave the room or windows are opened; • water saving actions in relation to leaks checking, and changes of sheets and towels frequency (less frequent than daily unless required by law, certification or particularly requested by the guest); • waste reduction and separation actions in relation to disposable items, disposal categories and items that shall not be disposed of with the wastewater. In addition, a poster or any other information material which would give advice to reduce food waste shall be displayed in the breakfast and dining rooms; • environmentally preferable means of transport available to guests; • the tourist accommodation shall provide information to guests on available local touristic points of interest, local guides, local restaurants, markets, craft centres. (b) Guests shall be given a questionnaire, via internet or at premises, asking about their views on the general environmental aspects of the tourist accommodation listed in point (a) and their overall satisfaction with the facilities and services of the tourist accommodation. A clear procedure which records customer comments, complaints, replies given and corrective actions taken shall be in place. Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when.

The dates and types of the staff training shall be recorded as evidence that this training update has taken place.
Annex II proposal for GM3 (guest information and feedback) in TR1
The small or medium-sized hotel shall provide guests with information to encourage environmentally responsible behaviour and support the implementation of the hotel's environmental measures in line with the mandatory and applicable optional criteria of the EU Ecolabel. This information may be communicated orally at reception or in written form in the rooms and shall cover key aspects relevant to the hotel's operations, such as the hotel's environmental policy and awareness of the EU Ecolabel, energy and water-saving practices, waste reduction and separation, environmentally preferable transport options, and relevant local attractions. Guests shall also be offered a questionnaire, online or on site, to give feedback on environmental practices and overall satisfaction. The hotel shall have a clear procedure to record guest comments and complaints and to implement corrective actions where needed. Assessment and verification: The applicant shall provide a declaration of compliance, a description of the guest information and feedback procedure, and records showing that feedback has been collected and considered.

Rationale for Theme 1

Stakeholder feedback clearly indicated that flexibility in the criteria is necessary to enable simpler and more suitable approaches for *tourist accommodation in small hotels, holiday and other short-term rentals.* These stakeholders highlighted that complex documentation, formalised reporting cycles and extensive staff training requirements create administrative burdens they cannot realistically meet, particularly given limited staffing structures and high turnover of seasonal workers.

In line with this feedback, the revised criteria for small hotels streamline the mandatory requirements in Annex I and by removing optional criteria that could be unfeasible for SMEs.

Regarding GM1, this criterion is adapted for small and medium-sized hotels by maintaining the core EMS structure while reducing administrative and technical complexity compared to the generic accommodation criterion.

The simplification is introduced in four specific ways:

1. Reduced scope of mandatory indicators
   The number of required monitoring indicators is limited to those most directly relevant and manageable for small and medium-sized hotels (energy, water, waste, chemicals). The indicator on the share of on-site renewable electricity is removed, as many small hotels lack the technical or financial capacity to install on-site generation, while this aspect is addressed elsewhere in the criteria set.

2. Simplified wording on chemicals and food services
   Chemical use is grouped into a single category covering cleaning, laundry, dishwashing and sanitising, avoiding detailed sub-process distinctions. Food waste monitoring is required only where food services are provided, reducing unnecessary reporting obligations for hotels without kitchens.

3. Streamlined maintenance and corrective action requirements
   Preventive maintenance is required in general terms (energy and water systems), without

exhaustive system lists or detailed record-keeping formats. Corrective actions are identified but not subject to prescriptive documentation requirements, allowing flexibility in implementation.

4. Lighter assessment and verification requirements
   The documentation requested for verification is reduced to essential elements (policy, action programme and periodic evaluation report), and performance data are requested only "where available". This lowers the administrative burden while preserving transparency and credibility.

Overall, the simplification ensures that small and medium-sized hotels can implement an EMS that is proportionate to their operational capacity, while still enabling systematic environmental performance monitoring, continuous improvement and alignment with EMAS and ISO 14001 frameworks.

Regarding GM2, the requirement for formal training, written manuals and detailed procedures is replaced by a broader reference to "written instructions, briefings or simple procedures". This recognises that small and medium-sized hotels often rely on informal or on-the-job training rather than structured training programmes, while still ensuring that staff receive the necessary information.

The original detailed and process-specific examples (e.g. irrigation, pool procedures, water hardness calculations) are consolidated into broader operational categories. This avoids requiring training on activities that may not exist in smaller hotels and reduces unnecessary complexity.

The fixed requirement for training within four weeks and annual refresher training is replaced by more flexible wording ("within a reasonable period" and "periodically, as needed"). This allows small hotels with high staff turnover or seasonal operations to integrate environmental training into existing workflows.

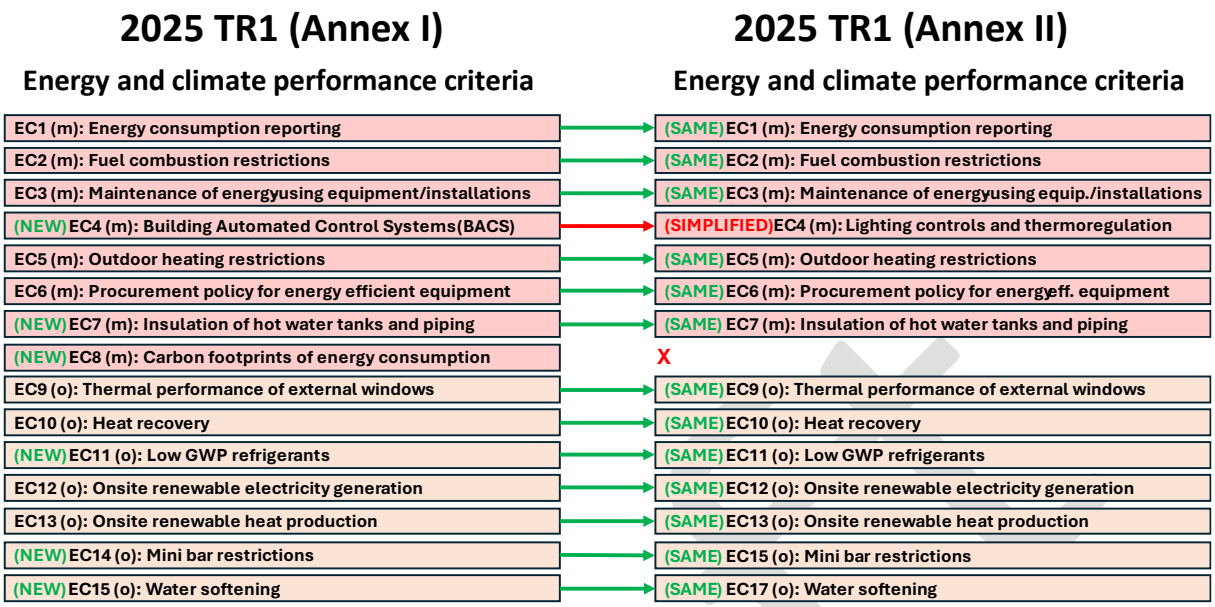
Instead of requiring detailed attendance and completion records and evidence of refresher training, the adapted criterion requires a description of the training approach and examples of materials, with records kept available. This reduces administrative burden while preserving verifiability.

Regarding GM3, the criterion was simplified by removing very detailed operational instructions such as precise window-opening behaviour, sheet and towel change frequencies, and posters for food waste reduction. This makes the requirement applicable to a wider range of small and medium hotels without prescribing actions that may not be relevant. Information delivery is generalised rather than specifying reception or in-room posters, and the feedback mechanism is described broadly rather than mandating exact formats. The documentation requirement is also simplified to focus on demonstrating that feedback is collected and considered rather than detailing exact training or questionnaire procedures.

Theme 2: Energy and climate performance

The requirements in Annex II are effectively the same as for Annex I but with the differences illustrated below.

Figure 15. Comparison of the criteria requirements/structure for the energy and climate theme for Annex I (large) and Annex II (small and medium) hotels, holiday homes and other short-term rentals



Source: Own elaboration.

In order to keep TR1 concise, only the differences between Annex I and Annex II proposals are explained here.

Energy consumption is a major source of environmental impacts in large, medium and small hotels alike. They all use the same basic building technical systems. The main difference is that the scale, and that systems in larger hotels will be more complex and have more sophisticated controls. For this reason, much of the energy criteria are the same in Annexes I and II.

The only two differences are a simplification of EC4 and the removal of EC8, which are both mandatory criteria. The requirement to report on the carbon footprint was removed in Annex II because it may result in an additional administrative burden for small hotel owners. For all other criteria, the same rationale as already described in the Annex I proposals applies.

EC4 (m): Building Automated Control System (BACS)

Annex I proposal for EC4 (Building Automated Control System (BACS)) in TR1
Centralised heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation (HVAC) shall be linked to a building automation and control system (BACS). The BACS shall provide: - Central monitoring of energy consumption at building or subsystem level. - Fault detection and diagnostics. - Thermostatic and time-schedule control of heating and cooling. - Occupancy-based control of HVAC and lighting in guest rooms - Automatic optimisation of technical building systems. Within the main hours of business activity, the temperature in communal areas shall be regulated to no lower than 23 ±3°C when outdoor temperatures exceed 26°C and to no higher than 21 ±3°C when outdoor temperatures are lower than 18°C. Within guest rooms, temperature controls should enable a room air temperature to be maintained within the range of 18 to 26°C when windows are closed and guest controls are activated in the room.

Interior lighting in low-traffic communal areas shall be programmed to dim and/or switch off unless triggered by motion sensors.
Exterior lighting not needed for security reasons shall be programmed to switch-off during off-peak hours (for example 0000 to 0600). Such lighting may also be linked to motion sensors for switching on again.

Assessment and verification: The applicant shall provide a declaration of compliance, together with a brief description of the BACS, its functional capabilities and setup in the establishment, including the temperature setpoint logic. This applicant declaration shall be supported by a declaration of the BACS supplier or installer. A copy of technical documentation for the BACS shall be provided to the competent body on request.
If lighting controls are independent of the BACS, a separate declaration about interior and exterior lighting controls and off-peak switch-off programming shall be provided. The declaration shall include the identification of the areas and number of approximate number of light points covered by the lighting switch-off system.

Annex II proposal for EC4 (Lighting controls and thermoregulation) in TR1

~~Centralised heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air-conditioning and ventilation (HVAC) shall be linked to a building automation and control system (BACS). The BACS shall provide:~~

- ~~Central monitoring of energy consumption at building or subsystem level.~~
- ~~Fault detection and diagnostics.~~
- ~~Thermostatic and time-schedule control of heating and cooling.~~
- ~~Occupancy-based control of HVAC and lighting in guest rooms~~
- ~~Automatic optimisation of technical building systems.~~

Within the main hours of business activity, the temperature in communal areas shall be regulated to no lower than 23 ±3°C when outdoor temperatures exceed 26°C and to no higher than 21 ±3°C when outdoor temperatures are lower than 18°C.
Within guest rooms, temperature controls should enable a room air temperature to be maintained within the range of 18 to 26°C when windows are closed and guest controls are activated in the room.
Interior lighting in low-traffic communal areas shall be programmed to dim and/or switch off unless triggered by motion sensors.
Exterior lighting not needed for security reasons shall be programmed to switch-off during off-peak hours (for example 0000 to 0600). Such lighting may also be linked to motion sensors for switching on again.

Assessment and verification: The applicant shall provide a declaration of compliance, together with a brief description of ~~the BACS, its functional capabilities and setup in the establishment, including~~ the temperature setpoint logic, lighting programs and controls. If a BACS system is used, the applicant shall also state ~~This applicant declaration shall be supported by a declaration of~~ the BACS supplier or installer and a~~. A~~ copy of technical documentation for the BACS shall be provided to the competent body on request. ~~If lighting controls are independent of the BACS, a separate declaration about interior and exterior lighting controls and off-peak switch-off programming shall be provided.~~ The declaration shall include the identification of the areas and number of approximate number of interior and exterior light points covered by the lighting switch-off system.

Rationale for Theme 2

Regarding the simplification of EC4, the requirement on EC4 has been modified in order to not mandate a requirement for a BACS to be installed. Article 13(12) if Directive (EU) 2024/1275 states:

"*Member States shall lay down requirements to ensure that, where technically and economically feasible, non-residential buildings with an effective rated output for heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation of:*

(a) over 290 kW are equipped with automatic lighting controls by 31 December 2027;

(b) over 70 kW are equipped with automatic lighting controls by 31 December 2029.

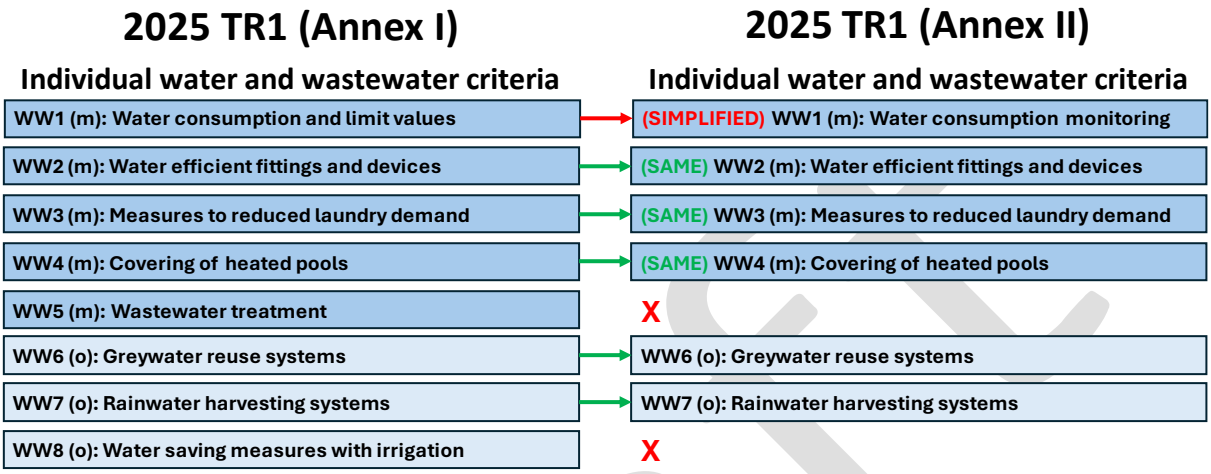
The automatic lighting controls shall be suitably zoned and capable of occupancy detection."

In large hotels, it is expected that an investment in BACS will be easier to justify because financing to invest in BACS will be easier to obtain and the payback period on larger BACS will normally be quicker. With smaller hotels under Annex II, some of the systems will not meet the 70 kW threshold and simpler control systems may also be able to achieve important energy savings.

Theme 3: Water and wastewater

The requirements in Annex II are effectively the same as for Annex I but with the differences illustrated below.

Figure 16. Comparison of the criteria requirements/structure for the water and wastewater theme for Annex I (large) and Annex II (small and medium) hotels, holiday homes and other short-term rentals.



Source: Own elaboration.

In order to keep TR1 concise, only the differences between Annex I and Annex II proposals are explained here.

Water consumption is an essential part of tourist accommodation services, regardless of the size of the establishment. They all use the same basic sanitary fittings, devices and appliances. The main difference is the scale, in terms of total guest-nights, and perhaps the types of additional services available.

There are differences in 3 of 8 WW criteria. The removal of WW5 on wastewater treatment was considered as a suitable simplification, since compliance with the local or regional law should be sufficient administrative burden for any establishments not connected to the mains sewers.

Criterion WW8 is also removed in Annex II for the reasons of simplification and because carefully planned, operated and maintained irrigation systems will probably not be a core skill of the smaller groups of staff that would operate in smaller hotels or short-term rentals.

This leaves the only comparison to make between Annex I and Annex II as being with criterion WW1.

WW1 (m): Water consumption monitoring

Annex I proposal for WW1 (Water consumption monitoring) in TR1
The applicant shall report on metered water consumption with a monthly resolution and overall annual value according to the table below. ~~Reported data shall cover all parts of the hotel that are related to tourist accommodation, but shall separately report consumption by additional services such as restaurants, leisure facilities, and MICE.~~ All cold water systems and related sanitary fittings shall be regularly inspected by in-house staff for leaks and repair measures taken as needed. Table X. Water consumption reporting template for one year

Parameter	J	F	M	A	M	J	J	A	S	O	N	D	Year
Total metered mains water (m3)													
Total metered abstracted water (m3)*													
Total guest-nights													
Total room-nights													
Specific total water consumption (L/guest-night, /room-night)													

*abstracted water refers to the private and legal supply of water from local groundwater tables or surface water bodies supplied directly to the tourist accommodation establishment.

~~Monitoring does not extend to flows in greywater circuits, rainwater harvesting systems or recirculation loops in HVAC or heat recovery systems.~~

Assessment and verification: The applicant shall provide a declaration of compliance, supported by a monitoring report that is based on records of meter readings taken as part of an in-house water monitoring system. These records shall be supported by utility invoices, as appropriate, and provided upon request by the competent body.
~~Water consumed by additional services such as restaurants, in-house laundry, leisure facilities, MICE and irrigation can be deducted from the calculation is suitable sub-metering is in place. The inclusion of any of these additional services in the water consumption reporting must be clearly stated.~~

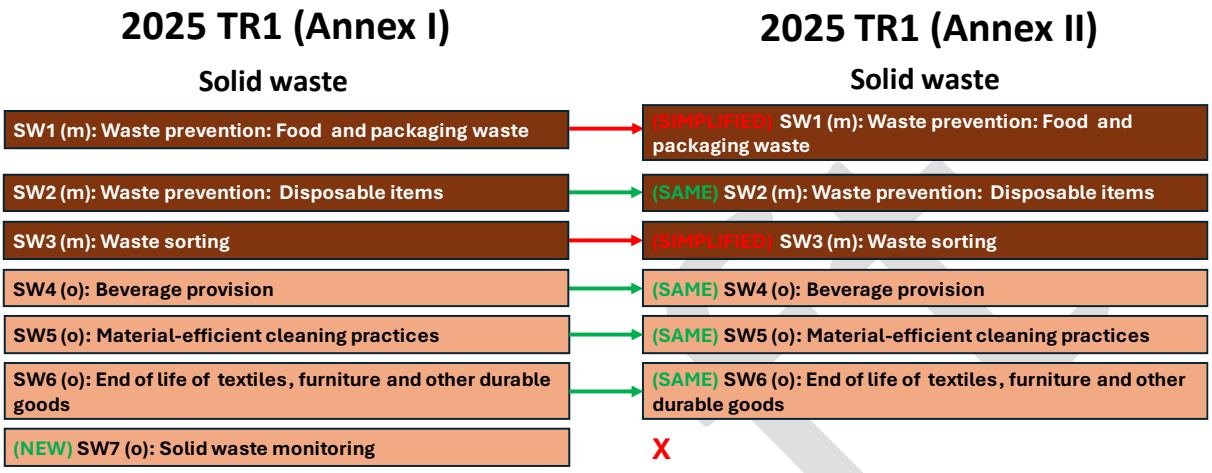
Rationale for Theme 3

Simplification of water consumption monitoring in WW1 is reasonable because many small or medium establishments will not have the different additional services that could be separately monitored. More detailed reporting is therefore optional, and the mandatory minimum reporting is already covered by taking meter readings once per month.

Theme 4: Solid Waste

A comparison of the individual criterion headings in Annex I and Annex II under the themes of "solid waste" are illustrated below.

Figure 17. Comparison of solid waste criteria requirements/structure under Annex I (large) and Annex II (small and medium) hotels, holiday homes and other short-term rentals



Source: Own elaboration.

The criteria from Annex I are mostly retained in Annex II, but the requirements have been adjusted for small hotels. The biggest difference is the removal of the optional requirement for solid waste reporting. As stated in the rationale for SW7 in Annex I, such reporting is feasible only in cases where a weighing facility is available at the premises or when an exclusive waste contractor can collect the waste and to this weighing at their own facilities.

The other two modifications are simplifications for SW1 and SW3, which are shown in more detail below.

SW1 (m): Waste prevention: Food and packaging waste

Annex I proposal for SW1 (Waste prevention: Food and packaging waste) in TR1
Without prejudice to the local or national regulation on provision of food services: a) With the aim to reduce package waste: No single dose packages for non-perishable food stuffs (e.g. coffee, sugar, chocolate powder (except tea bags)) shall be used for food services. b) With the aim to reduce package/food waste no single dose package for all perishable food stuffs (e.g. Yogurt, jams, honey, cold meats, pastries),shall be used for food services. The tourist accommodation shall follow a documented procedure linked to the action program (criterion GM1) which specifies all product types used. c) Use of disposable capsules for coffee machines in guest rooms and/or in the corridor, shall only be permitted if the capsules consist of minimum 75% recycled or 100% renewable material. Exempt from this criterion are: shops and vending machines under management of the tourist accommodation and single-dose sugar and/or coffee inside rooms under the condition that the products used for this purpose is fair trade and/or organic certificated. *Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and the documented procedure which outlines how both food and packaging waste are minimised. Where coffee capsules are used, the applicant shall provide a declaration describing capsule material and the*

recycling process of the capsules, together with confirmation from the recycling operator verifying that the capsules are recycled. Any legislation requiring the use of single dose products shall also be provided. If applicable, documentation to demonstrate the conditions required in the exemption shall be provided (e.g.~~,~~ organic and/or fair trade packaging label). This will be moreover checked during the on-site visit.
Perishable food is defined as being subject to decay or destruction, usually food that has been, for example minimally processed or not otherwise preserved and which relies on refrigerated storage in order to reduce the rate of decay and loss of quality (Codex Alimentarius).

Annex II proposal for SW1 (Waste prevention: Food and packaging waste) in TR1

Without prejudice to the local or national regulation on provision of food services,~~a)With the aim to reduce package waste: N~~no single dose packages for non-perishable food stuffs (e.g. coffee, sugar, chocolate powder (except tea bags)) shall be used for food services.

~~a) With the aim to reduce package/food waste no single dose package for all perishable food stuffs (e.g. Yogurt, jams, honey, cold meats, pastries),shall be used for food services. The tourist accommodation shall follow a documented procedure linked to the action program (criterion GM1) which specifies all product types used.~~

~~b) Use of disposable capsules for coffee machines in guest rooms and/or in the corridor, shall only be permitted if the capsules consist of minimum 75% recycled or 100% renewable material.~~

Exempt from this criterion are~~: shops and vending machines under management of the tourist accommodation and~~ single-dose sugar and/or coffee inside rooms under the condition that the products used for this purpose is fair trade and/or organic certificated.

Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and a supporting explanation.~~the documented procedure referred to in point b), which outlines how both food and packaging waste are minimised.~~ Any legislation requiring the use of single dose products shall also be provided. If applicable, documentation to demonstrate the conditions required in the exemption shall be provided (e.g. ~~take back declaration from coffee capsules producer,~~ organic and/or fair trade packaging label). This will be moreover checked during the on-site visit.
~~For the purposes of this criterion, Pperishable food is defined as being subject to decay or destruction, usually food that has been, for example minimally processed or not otherwise preserved and which relies on refrigerated storage in order to reduce the rate of decay and loss of quality (Codex Alimentarius).~~
~~Regarding point c) where coffee capsules are used, the applicant shall provide a declaration describing capsule material and the recycling process of the capsules, together with confirmation from the recycling operator verifying that the capsules are recycled.~~
~~If any exemptions apply to points a), b) or c), the applicant shall explain these in writing, supported by photos and references to any relevant legislation, as needed.~~

1805

1806 ## SW3 (m): Waste sorting

Annex I proposal for SW3 (Waste sorting) in TR1

Without prejudice to local or national regulations on waste separation, the tourist accommodation establishment shall provide containers for the separate disposable of the following types of waste:

- Sanitary waste in the guest bathrooms and public toilets.
- Plastic containers and packaging in guest rooms and public areas.
- Paper and cardboard in guest rooms and public areas.
- Glass containers in guest rooms and public areas.
- Compostable biogenic waste (uncooked or non-meat/non-fish food waste, coffee grinds, garden waste), in kitchen areas and public areas.
- Small waste electrical and electronic equipment in public areas.
- Textile waste in backroom areas.
- Used cooking oil in kitchen areas.
- Unsorted other waste, in public areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the waste separation system, the approximate number of bins and their locations, and how each of the different waste fractions are dealt with.
This shall be checked during the onsite visit. In cases where certain categories of waste are not accepted by the local authorities, and relevant waste contractors, the separate collection of those fractions in the list above may be exempted from this criterion.

Annex II proposal for SW3 (Waste sorting) in TR1

Without prejudice to local or national regulations on waste separation, the tourist accommodation establishment shall provide containers for the separate disposable of the following types of waste:

- Sanitary waste in the guest bathrooms and public toilets.
- Plastic containers and packaging in ~~guest rooms and~~ public areas.
- Paper and cardboard in ~~guest rooms and~~ public areas.
- Glass containers in ~~guest rooms and~~ public areas.
- Compostable biogenic waste (uncooked or non-meat/non-fish food waste, coffee grinds, garden waste), in kitchen areas ~~and public areas~~.
- Small waste electrical and electronic equipment in public areas.
- ~~Textile waste in backroom areas.~~
- Used cooking oil in kitchen areas.
- Unsorted other waste, in public areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the waste separation system, the approximate number of bins and their locations, and how each of the different waste fractions are dealt with.
This shall be checked during the onsite visit. In cases where certain categories of waste are not accepted by the local authorities, and relevant waste contractors, the separate collection of those fractions in the list above may be exempted from this criterion.

Rationale for Theme 4

Regarding SW1, the requirements have been greatly simplified by focusing only on the avoidance of single-use packaging in non-perishable items. This provides a certain degree of flexibility to smaller tourist accommodation providers about how to deal with the logistics of the perishable goods provided to guests and which options are available to buy from suppliers.

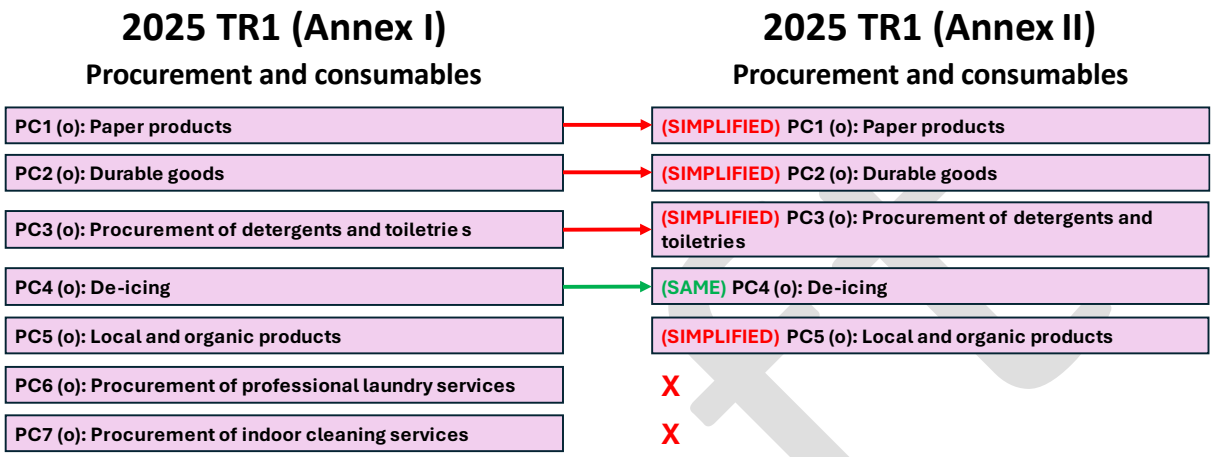
Regarding SW3, the whole requirement to separately collect textile wastes is removed because the potential quantities arising will be much less and perhaps could be covered by foreseen new kerbside collection responsibilities for municipalities under the Waste Framework Directive in 2026.

The collection of some of the recyclable waste fractions is now limited only to public areas instead of also to guest rooms as well. The main reason for this is to maximise the space available in the limited number of guest rooms at the establishment, which will in turn place less burden on housekeeping staff to check and empty those extra bins.

Theme 5: Procurement and consumables

A comparison of the individual criterion headings in Annex I and Annex II under the theme of "procurement and consumables" are illustrated below.

Figure 18. Comparison of procurement and consumables criteria requirements/structure under Annex I (large) and Annex II (small and medium) hotels, holiday homes and other short-term rentals



Source: Own elaboration

The adjustments made to the criteria in Annex II recognize the unique operational constraints and market realities faced by smaller establishments.

The requirements on PC6 and PC7 have been removed altogether. This is due to the perceived low likelihood that a small or medium tourist establishment would outsource its cleaning services to a contractor. Regarding professional laundry services, the picture is less clearcut, but for TR1 at least, it is proposed to remove PC6 as well as part of the simplification of the criteria set for smaller businesses.

Each of the simplifications are explained further below, but those for PC1, PC2 and PC3 are rooted in the more basic options that smaller businesses can use to procure goods (e.g. direct one-off purchases instead of longer-term and larger-volume procurement contracts.

PC1 (o): Paper products

Annex I proposal for PC1 (procurement of paper products) in TR1
The applicant shall have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of at least 90% (by number of purchased units) of the following categories of paper products that have been awarded the EU Ecolabel or other ISO Type I ecolabels (up to a combined maximum of 2.5X points): a) Toilet paper (0.5X points). b) Tissue paper (0.5X points). c) Office paper (0.5X points). d) Tourist guides or maps provided for free to guests (0.5X points). e) Envelopes (0.5X points). f) Notepads (0.5X points). g) Paper carrier bags (0.5X points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices or procurement documents) indicating the quantities of such products purchased and the quantities that have an ISO Type I ecolabel.
Where EU Ecolabel products are purchased, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the following Decisions:

- Toilet paper, tissue paper, office paper: Decision (EU) 2019/70 or a newer version of criteria that repeals this Decision.
- Tourist guides, maps, envelopes, notepads and paper carrier bags: Decision (EU) 2020/1803 or a newer version of criteria that repeals this Decision.

Where other ISO Type I labels are used, the applicant shall provide a copy of the Type I label certificate or packaging label.
In cases where the items are not produced by the applicant (namely free maps and tourist guides provided by the local or regional tourist board), evidence from invoices or procurement documents shall not be required. Instead, a declaration from the tourist board should be provided, stating that the free maps and/or other tourist guides have been printed in accordance with relevant ecolabel criteria.

Annex II proposal for PC1 (procurement of paper products) in TR1

Note: points shall be awarded in proportion to the minimum percentage of products purchased (in terms of quantity of purchased units). For example, if less than 10%: 0X points. If between 10 and 19%: 0.1X points. If between 20 and 29%: 0.2X points, and so on up to a maximum of 0.5X points per product category and 2.5X points for the whole criterion.

The tourist accommodation establishment~~applicant~~ shall proactively seek to purchase EU Ecolabel products in the categories listed below when needed. Products carrying other ISO Type I ecolabels shall also be counted as compliant with this criterion. ~~have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of at least 90% (by number of purchased units) of the following categories of paper products that have been awarded the EU Ecolabel or other ISO Type I ecolabels (up to a combined maximum of 2.5X points):~~

a) Toilet paper (0.5X points).
b) Tissue paper (0.5X points).
c) Office paper (0.5X points).
d) Tourist guides or maps provided for free to guests (0.5X points).
e) Envelopes (0.5X points).
f) Notepads (0.5X points).
g) Paper carrier bags (0.5X points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices, ledgers or procurement documents) indicating the quantities of such products purchased and the quantities that have an ISO Type I ecolabel.
Where EU Ecolabel products are purchased, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the following Decisions:

- Toilet paper, tissue paper, office paper: Decision (EU) 2019/70 or a newer version of criteria that repeals this Decision.
- Tourist guides, maps, envelopes, notepads and paper carrier bags: Decision (EU) 2020/1803 or a newer version of criteria that repeals this Decision.

Where other ISO Type I labels are used, the applicant shall provide a copy of the Type I label certificate or packaging label.
In cases where the items are not produced by the applicant (namely free maps and tourist guides provided by the local or regional tourist board), evidence from invoices or procurement documents shall not be required. Instead, a declaration from the tourist board should be provided, stating that the free maps and/or other tourist guides have been printed in accordance with relevant ecolabel criteria.

PC2 (o): Durable goods

Annex I proposal for PC2 (procurement of certain durable goods) in TR1

Note: Points between 0.1X and 0.5X shall be awarded in proportion to the share of award criterion granted to ISO Type I ecolabel products in procurement contracts (i.e. a 10% of purchase price award corresponds to 0.1X points and a 50% of purchase price award corresponds to 0.5X points). In cases where ISO Type I ecolabels are mandated directly in technical specifications, 0.5X points shall be awarded.

The tourist accommodation establishment shall have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of products that have been awarded the EU Ecolabel or another ISO Type I ecolabel in at least one of the following categories of durable goods listed below. (up to a combined maximum of 2X points):

a) Bed-linen.
b) Towels.
c) Bed mattresses.
d) Furniture.
e) Wood-, cork- or bamboo-based floor coverings
f) Hard floor coverings.

Assessment and verification: The applicant shall provide a copy of the procurement documentation indicating the relevant technical specifications and/or award criteria specifying the demand for any one or more of relevant ISO Type I ecolabels.
Where EU Ecolabel products are specified and procured, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label, confirming that it was awarded in accordance with:

- Bed-linen or towels: Decision 2014/350/EU or a newer version of criteria that repeals this Decision.
- Bed mattresses: Decision 2014/391/EU or a newer version of criteria that repeals this Decision.
- Furniture: Decision 2016/1332/EU or a newer version of criteria that repeals this Decision.
- Wood-, cork- or bamboo-based floor coverings: Decision (EU) 2017/176 or a newer version of criteria that repeals this Decision.
- Hard covering products: Decision (EU) 2021/476 or a newer version of criteria that repeals this Decision.

Where other ISO type I labels are specified and procured, the applicant shall provide a copy of the Type I label certificate or packaging label.

Annex II proposal for PC2 (procurement of certain durable goods) in TR1

Note: points shall be awarded in proportion to the minimum percentage of products purchased (in terms of quantity of purchased units). For example, if less than 10%: 0X points. If between 10 and 19%: 0.1X points. If between 20 and 29%: 0.2X points, and so on up to a maximum of 0.5X points per product category and 2X points for the whole criterion.
~~*Note: Points between 0.1X and 0.5X shall be awarded in proportion to the share of award criterion granted to ISO Type I ecolabel products in procurement contracts (i.e. a 10% of purchase price award corresponds to 0.1X points and a 50% of purchase price award corresponds to 0.5X points). In cases where ISO Type I ecolabels are mandated directly in technical specifications, 0.5X points shall be awarded.*~~

The tourist accommodation establishment shall proactively seek to purchase EU Ecolabel products in the categories listed below when needed. Products carrying other ISO Type I ecolabels shall also be counted as compliant with this criterion.~~have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of products that have been awarded the EU Ecolabel or another ISO Type I ecolabel in at least one of the following categories of durable goods listed below. (up to a combined maximum of 2X points):~~

a) Bed-linen.
b) Towels.
c) Bed mattresses.
d) Furniture.
e) Wood-, cork- or bamboo-based floor coverings
f) Hard floor coverings.

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices, ledgers or procurement documents) indicating the quantities of such products purchased and the quantities that have an ISO Type I ecolabel. ~~The applicant shall provide a copy of the procurement~~

~~documentation indicating the relevant technical specifications and/or award criteria specifying the demand for any one or more of relevant ISO Type I ecolabels.~~

Where EU Ecolabel products are specified and procured, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label, confirming that it was awarded in accordance with:

- Bed-linen or towels: Decision 2014/350/EU or a newer version of criteria that repeals this Decision.
- Bed mattresses: Decision 2014/391/EU or a newer version of criteria that repeals this Decision.
- Furniture: Decision 2016/1332/EU or a newer version of criteria that repeals this Decision.
- Wood-, cork- or bamboo-based floor coverings: Decision (EU) 2017/176 or a newer version of criteria that repeals this Decision.
- Hard covering products: Decision (EU) 2021/476 or a newer version of criteria that repeals this Decision.

Where other ISO type I labels are specified and procured, the applicant shall provide a copy of the Type I label certificate or packaging label.

PC3 (o): Procurement of detergents and toiletries

Annex I proposal for PC3 (procurement of detergents and toiletries) in TR1

The tourist accommodation establishment shall have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of at least 50% (by volume of purchased units) of the following categories of detergent products and toiletries that have been awarded the EU Ecolabel or other ISO Type I ecolabels (up to a combined maximum of 5X points):

a) Hand dishwashing detergent (0.5X points).
b) Dishwasher detergent (0.5X points).
c) Laundry detergent (0.5X points).
d) All purpose cleaners / floor cleaners (0.5X points).
e) Glass cleaner (0.5X points).
f) Kitchen cleaner/degreaser (0.5X points).
g) W/C gels (0.5X points).
h) Hand soap (0.5X points).
i) Shower gel (0.5X points).
j) Shampoo (0.5X points).
k) Hair conditioner (0.5X points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices or procurement documents) indicating the quantities of such products purchased and the quantities that have an ISO Type I ecolabel.

Where EU Ecolabel products are purchased, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the following Decisions:

- Hand dishwashing detergent: Decision (EU) 2017/1214 or a newer version of criteria that repeals this Decision.
- Dishwasher detergent: Decision (EU) 2017/1215, or Decision (EU) 2017/1216, or newer versions of criteria that repeal these Decisions.
- Laundry detergent: Decision (EU) 2017/1218, or Decision (EU) 2017/1219, or newer versions of criteria that repeal these Decisions.
- All purpose cleaners, floor cleaners, glass cleaners, kitchen cleaners, W/C gels: Decision (EU) 2017/1217, or a newer version of criteria that repeals this Decision.
- Hand soaps, shower gels, shampoos, hair conditioners: Decision (EU) 2023/1870.

Where other ISO Type I labels are used, the applicant shall provide a copy of the Type I label certificate or packaging label.

Annex II proposal for PC3 (procurement of detergents and toiletries) in TR1

Note: points shall be awarded in proportion to the minimum percentage of products purchased (in terms of quantity of purchased units). For example, if less than 10%: 0X points. If between 10 and 19%: 0.1X points. If between 20 and 29%: 0.2X points, and so on up to a maximum of 0.5X points per product category and 5X points for the whole criterion.

The tourist accommodation establishment shall proactively seek to purchase EU Ecolabel products in the categories listed below when needed. Products carrying other ISO Type I ecolabels shall also be counted as compliant with this criterion.~~have in place a procurement strategy that requires, whenever applicable and technically feasible, the purchase of at least 50% (by volume of purchased units) of the following categories of detergent products and toiletries that have been awarded the EU Ecolabel or other ISO Type I ecolabels (up to a combined maximum of 5X points):~~

a) Hand dishwashing detergent (0.5X points).
b) Dishwasher detergent (0.5X points).
c) Laundry detergent (0.5X points).
d) All purpose cleaners / floor cleaners (0.5X points).
e) Glass cleaner (0.5X points).
f) Kitchen cleaner/degreaser (0.5X points).
g) W/C gels (0.5X points).
h) Hand soap (0.5X points).
i) Shower gel (0.5X points).
j) Shampoo (0.5X points).
k) Hair conditioner (0.5X points).

Assessment and verification: The applicant shall provide data and documentation (including relevant invoices, ledgers or procurement documents) indicating the quantities of such products purchased and the quantities that have an ISO Type I ecolabel.
Where EU Ecolabel products are purchased, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label showing that it was awarded in accordance with the following Decisions:

- Hand dishwashing detergent: Decision (EU) 2017/1214 or a newer version of criteria that repeals this Decision.
- Dishwasher detergent: Decision (EU) 2017/1215, or Decision (EU) 2017/1216, or newer versions of criteria that repeal these Decisions.
- Laundry detergent: Decision (EU) 2017/1218, or Decision (EU) 2017/1219, or newer versions of criteria that repeal these Decisions.
- All purpose cleaners, floor cleaners, glass cleaners, kitchen cleaners, W/C gels: Decision (EU) 2017/1217, or a newer version of criteria that repeals this Decision.
- Hand soaps, shower gels, shampoos, hair conditioners: Decision (EU) 2023/1870.

Where other ISO Type I labels are used, the applicant shall provide a copy of the Type I label certificate or packaging label.
Where EU Ecolabel products are specified and procured, the applicant shall provide a copy of the EU Ecolabel certificate or packaging label, confirming that it was awarded in accordance with:

- Bed-linen or towels: Decision 2014/350/EU or a newer version of criteria that repeals this Decision.
- Bed mattresses: Decision 2014/391/EU or a newer version of criteria that repeals this Decision.
- Furniture: Decision 2016/1332/EU or a newer version of criteria that repeals this Decision.
- Wood-, cork- or bamboo-based floor coverings: Decision (EU) 2017/176 or a newer version of criteria that repeals this Decision.
- Hard covering products: Decision (EU) 2021/476 or a newer version of criteria that repeals this Decision.

Where other ISO type I labels are specified and procured, the applicant shall provide a copy of the Type I label certificate or packaging label.

PC5 (o): Local and organic products

Annex I proposal for PC5 (local and organic food and beverage products) in TR1
a) At least two locally sourced and not out of season (for fresh fruit and vegetables) food products shall be offered at each meal including breakfast (1 point) *b) The tourist accommodation actively chooses local suppliers of goods and services (1 point)* *c) At least 2 products (1 point) or 4 products (2 points) used in daily meal preparation and/or sold in the shop shall have been produced by organic farming methods, as laid down in Council Regulation*

(EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products (46) (1 point)

For the purpose of this criterion local means within a 160 kilometres radius of the tourist accommodation.

Assessment and verification:

The applicant shall provide a declaration of compliance with this criterion, together with appropriate supporting documentation. Where organic products are used, the applicant shall provide a copy of the product certificate or packaging label showing that it was awarded in accordance with the Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products (47). In some countries, it is possible for restaurants and hotels to be awarded by some labelling schemes when they use only organic products. Where a tourist accommodation is awarded by these types of schemes (or similar) this information could be provided as evidence of compliance with this criterion.

Annex II proposal for PC3 (procurement of detergents and toiletries) in TR1

~~*a) At least two locally sourced and not out of season (for fresh fruit and vegetables) food products shall be offered at each meal including breakfast (1 point)*~~

~~*b) The tourist accommodation actively chooses local suppliers of goods and services (1 point)*~~

At least 2 products (1 point) or 4 products (2 points) used in daily meal preparation and/or sold in the shop shall have been produced by organic farming methods, as laid down in Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products ~~(46)~~ (1 point)

~~*For the purpose of this criterion local means within a 160 kilometres radius of the tourist accommodation.*~~

Assessment and verification:

The applicant shall provide a declaration of compliance with this criterion, together with ~~appropriate supporting documentation. Where organic products are used, the applicant shall provide~~ a copy of the product certificate or packaging label showing that it was awarded in accordance with the Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products ~~(47)~~.

In some countries, it is possible for restaurants and hotels to be awarded by some labelling schemes when they use only organic products. Where a tourist accommodation is awarded by these types of schemes (or similar) this information could be provided as evidence of compliance with this criterion.

Rationale for Theme 5

PC1 lowers the requirement for paper products from 90% in Annex I to 50%, while still recognising and proportionately rewarding any purchase share that is above 10%. This provides a broad and incremental incentive to operators to seek out EU Ecolabel and other ISO Type I paper products. These lower thresholds are more appropriate for smaller businesses who may seek to procure smaller quantities and only from a limited number of potential suppliers.

PC2 does not so much change the ambition level but rather the approach. In Annex I, the approach is focused on a large-scale professional procurement thinking. However in Annex II, a simpler purchase by purchase approach is taken, similar to what is described in PC1 for Annex II.

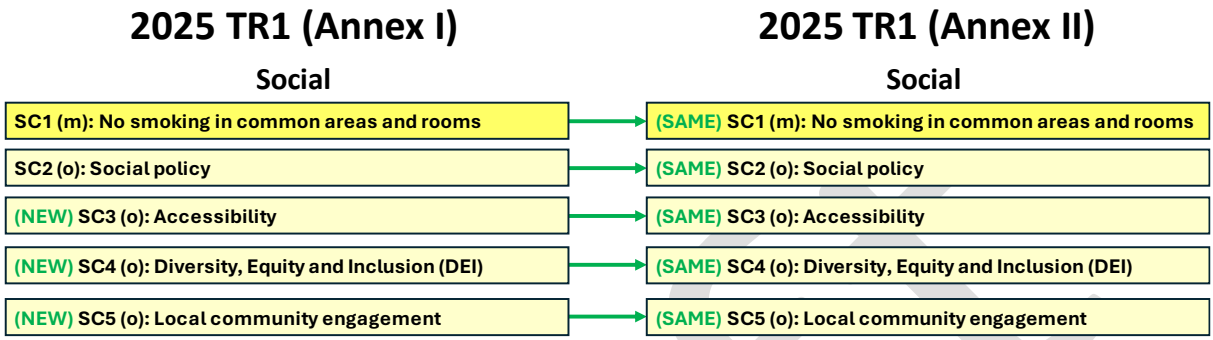
PC3 has been adapted to ensure a consistent language for the criteria with PC1 and PC2. In the end, PC1 to PC3 are all the same type of requirement, but for very different types of products that are used at tourist accommodation establishments.

PC5 takes a simpler approach by only focusing on organic food and beverages, which can be attested to by third party verified labels on the packaging, instead of requiring proof of why products are local.

Theme 6: Social

A comparison of the individual criterion headings in Annex I and Annex II under the theme of "social" are illustrated below.

Figure 19. Comparison of social criteria requirements/structure under Annex I (large) and Annex II (small and medium) hotels, holiday homes and other short-term rentals



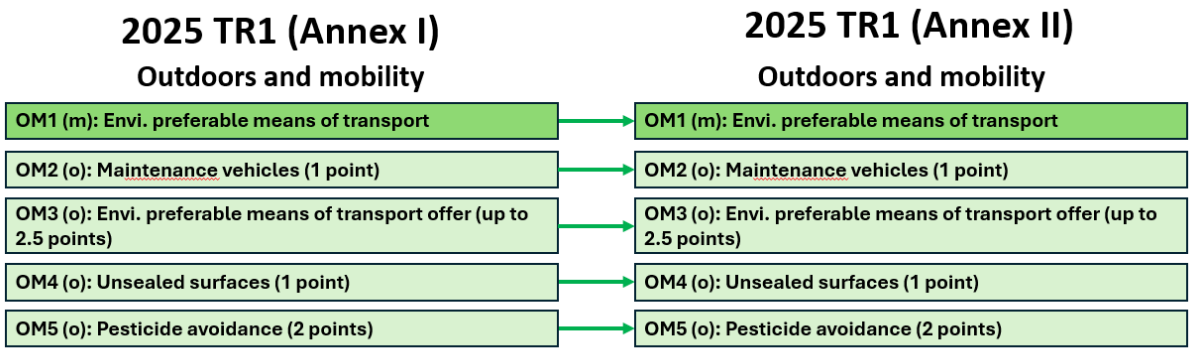
Source: Own elaboration

Since the requirements are the same, there is nothing further to report on theme 6 in Annex II.

Theme 7: Outdoors and mobility

A comparison of the individual criterion headings in Annex I and Annex II under the theme of "outdoors and mobility" are illustrated below.

Figure 20. Comparison of outdoors and mobility criteria requirements/structure under Annex I (large) and Annex II (small and medium) hotels, holiday homes and other short-term rentals



Source: Own elaboration

Since the requirements are the same, there is nothing further to report on theme 6 in Annex II.

5. Annex III: Criteria proposals and rationale

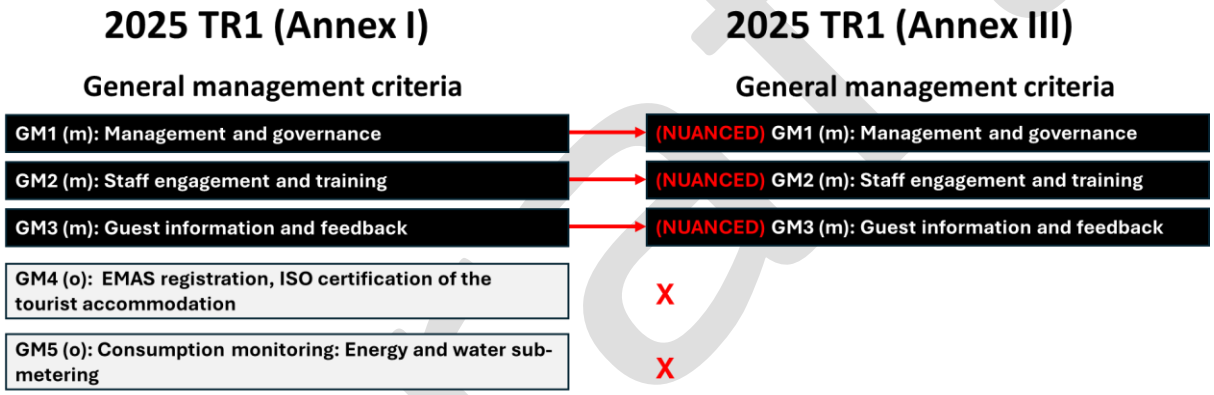
As described in the scope, Annex III corresponds to *"Campsite and/or caravan park accommodation".*

Please note that all optional criteria proposals have "X points" denoted. This indicates that the exact number of points to allocate has not yet been considered, since it will first be necessary to have a settled number of optional criteria before deciding on the precise distribution of points. In some cases, different multiples of X are indicated in the same criterion. This is simply to indicate the relative importance or weighting of those specific parts of that criterion.

Theme 1: General management

The requirements in Annex III are effectively the same as for Annex I but with the differences illustrated below.

Figure 21. Comparison of the criteria requirements/structure for the general management theme for Annex I (large) and Annex III campsite and/or caravan park accommodation.



Source: Own elaboration.

In order to keep TR1 concise, only the differences between Annex I and Annex III proposals are explained here. Mandatory criteria in Annex I have been slightly adapted to the context of campsite and/or caravan park accommodation while the optional criteria in Annex I is proposed not to apply to campsite and/or caravan park accommodation.

GM1 (m): Management and governance

Annex I proposal for GM1 (management and governance)
The tourist accommodation establishment shall have implemented and maintain an Environmental Management System (EMS) and have an appointed person to be responsible for all operational aspects of the EMS. The EMS shall include the following elements: (a) An environmental policy identifying the most relevant environmental aspects regarding energy, water, waste, and, where applicable, chemical use. This policy shall be communicated to staff and made publicly available to guests and other interested parties. (b) A detailed action programme establishing measurable targets on performance for the identified environmental aspects. Targets shall be reviewed and updated at least every two years, taking into consideration the requirements of this EU Ecolabel Decision. Where relevant environmental aspects are not

covered by the EU Ecolabel, targets shall preferably be based on environmental performance indicators and benchmarks of excellence defined in the EMAS Sectoral Reference Document (31) for the tourism sector.
(c) An internal evaluation process that enables reporting on at least the following data:

- Specific energy consumption (kWh/guest night and kWh/internal conditioned m² per year) (linked to EC1).
- Percentage of final electricity use supplied by onsite renewable generation (%) (linked to EC11).
- Water consumption per guest-night (litres/guest-night), including irrigation where relevant.
- Waste generation per guest-night (kg/guest-night), food waste shall be monitored separately.
- Consumption of chemical products for cleaning, dishwashing, laundry, sanitising, and other special processes (kg or litres/guest-night), specifying if they are reported as ready-to-use quantities or as undiluted quantities.
- Percentage of ISO Type I labelled products used under the applicable optional criteria.

The internal evaluation process shall include:

(i) Verification of compliance with targets defined in the action programme.
(ii) Logging and records of preventative maintenance checks for energy and water systems, including HVAC, refrigeration, plumbing, and irrigation, to ensure proper functioning and detect leaks (linked to EC3).
(iii) Assessment of corrective actions where targets are not met.
(iv) Consideration of feedback collected from guests (linked to GM3).

All information resulting from monitoring, maintenance and evaluation shall be made available for consultation by staff and guests.

Assessment and verification: The applicant shall provide a declaration of compliance, together with:
— a copy of the environmental policy,
— a copy of the action programme including measurable targets and data from the last year, if available, and
— within two years of the licence being awarded, the evaluation report, including tracking of compliance with targets, maintenance records, a record of any corrective actions taken (if needed) and a description of how guest feedback has been considered. Updated evaluation reports shall be submitted to the competent body every two years.
Applicants registered under EMAS or certified according to ISO 14001 shall be deemed to comply. In the case of ISO 14001 certification, a report summarising performances against the action programme targets.

Annex III proposal for GM1 management and governance in TR1

The campsite and/or caravan park shall have implemented and maintain an Environmental Management System (EMS) appropriate to its scale and operations, with a designated person responsible for all operational aspects of the EMS.
The EMS shall include the following elements:
(a) An environmental policy identifying the most relevant environmental aspects for campsites/caravan parks, including at least energy, water, waste, land use/soil protection, wastewater, noise, and, where applicable, chemical use (e.g. cleaning, maintenance, pool treatment). Information on these aspects shall be available to staff and guests.
(b) A documented action programme establishing measurable targets for the identified environmental aspects. Targets shall be reviewed and updated at least every two years, taking into account the requirements of this EU Ecolabel Decision. Where relevant aspects are not covered by the EU Ecolabel criteria, targets should preferably be based on environmental performance indicators and benchmarks of excellence defined in the EMAS Sectoral Reference Document on best environmental management practice for the tourism sector.

[31] Commission Decision (EU) 2016/611 of 15 April 2016 on the reference document on best environmental management practice, sector environmental performance indicators and benchmarks of excellence for the tourism sector under Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS) (OJ L 104, 20.4.2016, p. 27).

(c) An internal evaluation process shall be carried out at least annually to verify performance against the action programme targets and define corrective actions where necessary. The evaluation shall enable reporting on at least the following data, as applicable to campsites/caravan parks:

- Specific energy consumption (kWh/guest-night and/or kWh/pitch-night and/or kWh/m² of heated sanitary or service buildings per year).
- Percentage of final energy consumption met by on-site renewable energy (%).
- Water consumption (litres/guest-night and/or litres/pitch-night), including irrigation and shared sanitary facilities where relevant.
- Waste generation (kg/guest-night and/or kg/pitch-night), with food waste monitored separately where food services are provided.
- Consumption of chemical products for cleaning, dishwashing, laundry, sanitation of sanitary blocks, pools, and other maintenance processes (kg or litres/guest-night or per pitch-night), specifying whether quantities are ready-to-use or undiluted.
- Percentage of ISO Type I ecolabelled products (%) used under the applicable optional criteria of this EU Ecolabel Decision.

The internal evaluation process shall include:
(i) Verification of compliance with the targets defined in the action programme.
(ii) Logging and records of preventive maintenance checks for energy and water systems, including sanitary facilities, shared kitchens, HVAC in common buildings, refrigeration, plumbing, wastewater systems, and irrigation, to ensure proper functioning and leak detection.
(iii) Assessment and documentation of corrective actions where targets are not met.
(iv) Consideration of feedback collected from guests and long-stay users.
All information resulting from monitoring, maintenance and evaluation shall be made available for consultation by staff and guests.

Assessment and verification
The applicant shall provide a declaration of compliance, together with:
— a copy of the environmental policy;
— a copy of the action programme including measurable targets and monitoring data from the last year, where available; and
— within two years after the licence is awarded, an evaluation report, updated every two years, including tracking of compliance with targets, maintenance records, corrective actions taken (if any), and a description of how guest feedback has been considered.
Updated evaluation reports shall be submitted to the competent body every two years.
Applicants registered under EMAS or certified according to ISO 14001 shall be deemed to comply. In the case of ISO 14001 certification, a report summarising performance against the action programme targets shall be submitted as evidence.

1897 GM2 (m): Staff engagement and training

Annex I proposal for GM2 (staff engagement and training)
(a) The tourist accommodation shall provide information and training to all staff (including subcontracted external staff), including written procedures or manuals, to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. Staff training shall cover the following aspects: (i) the environmental policy and action programme of the accommodation and awareness of the EU Ecolabel; (ii) energy saving actions (e.g. use of eco-cycles in dishwashers and washing machines, lights, air conditioning, heating, appliances); (iii) water saving actions (e.g. use of eco-cycles in dishwashers and washing machines, leaks, sheet/towel changes, irrigation, pool procedures where relevant); (iv) chemical use minimisation and optimal detergent dosages for laundry and dishwashing (based on water hardness and soiling), correct dilutions for concentrated cleaning products, etc.; (v) waste reduction, separation and management of disposable items;

(vi) operational measures to reduce environmental impact in daily activities;
(vii) communication to guests on environmental practices and key behavioural messages (linked to GM3).
(b) New staff shall receive training within 4 weeks of starting. All staff shall receive refresher training at least annually.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and attendance and completion records. Evidence of refresher training and updates on operational measures shall be included.

Annex III proposal for GM2 staff engagement and training in TR1

The campsite shall ensure all staff are aware of the main environmental practices relevant to the EU Ecolabel, using proportionate and practical measures such as short briefings, induction notes, checklists, posters, stickers, or instruction cards.

- New staff shall receive a briefing as soon as possible.
- Core staff shall receive refresher briefings at least once a year.
- Seasonal or temporary staff should receive proportionate guidance to cover key practices.

Assessment and verification

The applicant shall provide:

- Description of the information and training approach, including communication methods (briefings, instructions, checklists, posters, on-the-job guidance)
- Copies of materials used to inform or train staff

1898 GM3 (m): Guest information and feedback

Annex I proposal for GM3 (guest information and feedback)

(a)The tourist accommodation shall also provide information to the guests to ensure the application of environmental measures and to raise awareness of environmentally responsible behaviour in accordance with the mandatory and applicable optional criteria in this EU Ecolabel. That information shall be actively given to the guests in oral or written form at the reception or in-room and shall include, in particular, the following aspects:

- environmental policy of the tourist accommodation and awareness of the EU Ecolabel for tourist accommodation;
- energy saving actions in relation to lights, air conditioning and heating systems when the guests leave the room or windows are opened;
- water saving actions in relation to leaks checking, and changes of sheets and towels frequency (less frequent than daily unless required by law, certification or particularly requested by the guest);
- waste reduction and separation actions in relation to disposable items, disposal categories and items that shall not be disposed of with the wastewater. In addition, a poster or any other information material which would give advice to reduce food waste shall be displayed in the breakfast and dining rooms;
- environmentally preferable means of transport available to guests;
- the tourist accommodation shall provide information to guests on available local touristic points of interest, local guides, local restaurants, markets, craft centres.

(b) Guests shall be given a questionnaire, via internet or at premises, asking about their views on the general environmental aspects of the tourist accommodation listed in point (a) and their overall satisfaction with the facilities and services of the tourist accommodation. A clear procedure which records customer comments, complaints, replies given and corrective actions taken shall be in place.

Assessment and verification:

The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when. The dates and types of the staff training shall be recorded as evidence that this training update has taken place.

Annex III proposal for GM3 guest information and feedback in TR1
The campsite shall provide guests with information on key environmental practices using proportionate methods, such as leaflets, posters in shared areas, digital messages, or brief oral explanations at check-in. Information shall include, at minimum: • The campsite's environmental policy • Energy saving actions (e.g., switching off lights, heating, or cooling when leaving communal or rented areas) • Water saving actions (e.g., reporting leaks, managing shower/tap use, etc.) • Waste reduction and separation, including proper disposal of items not to be flushed or poured into wastewater • Environmentally preferable transport options available to guests • Information on local attractions, markets, or cultural experiences to promote sustainable local tourism • Guests shall be invited to provide feedback via a simple questionnaire, either online or on-site, regarding environmental practices and overall satisfaction. The campsite shall have a procedure to record comments, complaints, responses, and corrective actions taken. Assessment and verification The applicant shall provide: • Declaration of compliance • Examples of guest information materials (leaflets, posters, digital messages, or check-in briefings) • Procedure for collecting and managing guest feedback

Rationale for Theme 1

Criteria are further simplified to match the operational realities of campsites. The environmental policy and action programme focus on essential aspects of water, energy, and waste management. Monitoring frequency is reduced, and the internal evaluation is oriented toward essential performance indicators. Guest guidance is practical, prioritising on-site behavioural changes and resource-efficient practices.

Regarding GM1, campsites and caravan parks are characterised by environmental pressures that differ from those of other tourist accommodation, notably due to outdoor land use, pitch-based occupancy, shared sanitary and service facilities, seasonal operation and variable numbers of guests per unit. Requiring the implementation of an Environmental Management System (EMS) ensures a structured and continuous approach to identifying, monitoring and reducing the most relevant environmental impacts linked to these specific operational characteristics.

The use of both guest-night and pitch-night indicators allows environmental performance to be normalised in a way that reflects actual resource use patterns. In campsites and caravan parks, consumption of energy, water, wastewater services and waste management is often driven by the number of occupied pitches rather than by individual guests, while guest-night indicators remain relevant for services directly linked to personal use. This approach improves accuracy, comparability and fairness across sites of different sizes and configurations.

The requirement for measurable targets, regular monitoring and periodic internal evaluation supports continuous improvement, enables early identification of inefficiencies (e.g. leaks in sanitary facilities or excessive water use for irrigation), and strengthens environmental accountability. Preventive maintenance and corrective actions are particularly important given the reliance on shared infrastructure.

Shared sanitary blocks, dishwashing and laundry areas, reception buildings and other service facilities are explicitly included because they are integral to the operation of campsites and caravan

parks and typically represent the main sources of energy and water consumption. Their inclusion ensures that the EMS and monitoring activities cover the most environmentally relevant systems, rather than focusing solely on outdoor areas or individual pitch hook-ups.

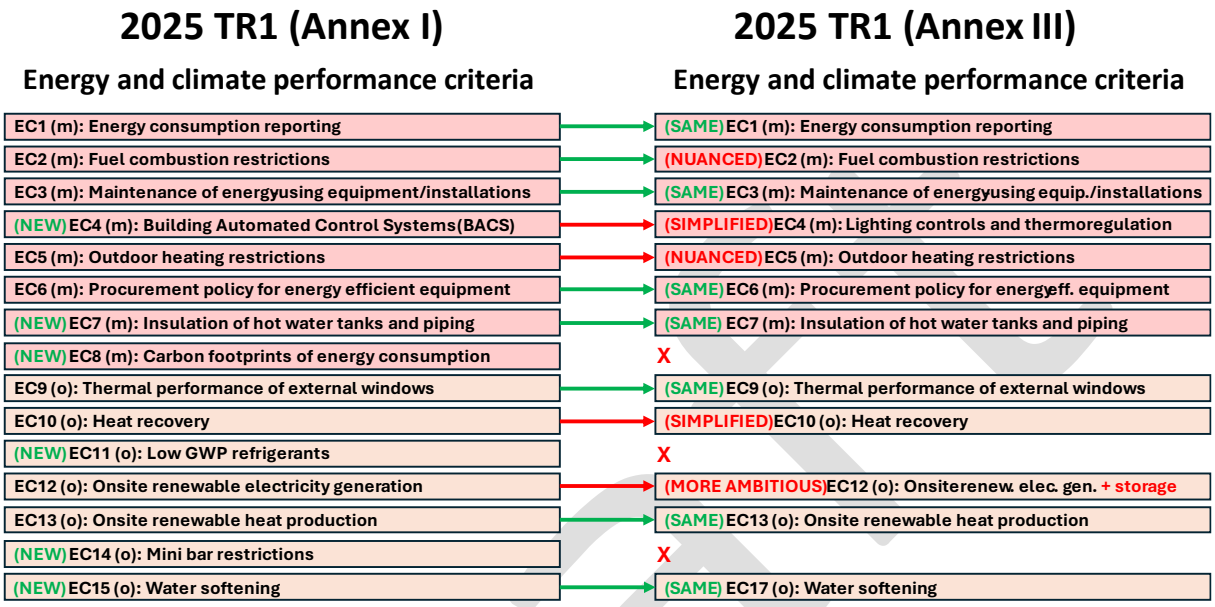
Regarding GM2, staff engagement and training (GM2) are designed to accommodate seasonal and temporary staff, ensuring that all personnel receive practical, concise, and actionable environmental guidance. The focus is on behaviours with direct environmental impact, such as leak reporting, water-efficient use of shared facilities, waste separation, and responsible outdoor practices. Refresher briefings at least annually ensure continuity between seasons and allow incorporation of updates or improvements. Training materials are simplified and proportionate, enabling small sites to maintain compliance without extensive administrative burden.

Regarding GM3, guest information and feedback are adapted to provide proportionate and effective guidance to campers, emphasizing behaviours that directly influence environmental performance. Information is delivered through practical methods such as posters, leaflets, digital messages, or short oral briefings, covering energy and water saving, waste management, environmentally preferable transport, and local sustainable tourism opportunities. Feedback procedures are simplified to be achievable by small properties while enabling corrective actions and continuous improvement.

Theme 2: Energy and climate performance

The requirements in Annex III are effectively the same as for Annex I but with the differences illustrated below.

Figure 22. Comparison of the criteria requirements/structure for the energy and climate theme for Annex I (large) and Annex III campsite and/or caravan park accommodation.



Source: Own elaboration.

In order to keep TR1 concise, only the differences between Annex I and Annex III proposals are explained here. There were six differences in total, relating to EC4, EC8, EC11, EC12 and EC14. For all other criteria, the same rationale as already described in the Annex I proposals applies.

EC2 (m): Fuel combustion restrictions

Annex I proposal for EC2 (fuel combustion restrictions) in TR1
The tourist accommodation establishment shall not use solid- or liquid-based fossil fuels or peat for the generation or heat and/or power. Any boilers, local space heaters or CHP units that use solid biomass fuels (e.g. log wood, wood pellets, straw, olive stones etc.) shall be equipped with an electrostatic precipitator or similarly efficacious particulate emission abatement technology. Assessment and verification: The applicant shall provide a declaration of compliance, supported by a list and brief description of the boilers, combined heat and power units and local space heaters used in the tourist accommodation establishment. Descriptions shall include, as a minimum, the rated capacity (in kW), the manufacturer name, model name/number, and the type or types of fuel that can be used in the equipment. In cases, where solid- or liquid-based fossil fuels can technically be used by the biomass boilers or heaters, the applicant shall further declare on the explicit non-use of such fuels. In cases where solid biomass fuels are used, the description shall also include details of the exhaust gas abatement system.

Annex III proposal for fuel combustion restrictions
Note: For clarity, this requirement does not apply to the use of fuels or firelighters for heating or cooking brought by tourists for use in their own equipment. The requirement for exhaust gas abatement for biomass-fired local space heaters does not apply to outdoor campfires. The tourist accommodation establishment shall not use solid- or liquid-based fossil fuels or peat for the generation or heat and/or power. Any outdoor barbeques or grills belonging to the tourist establishment shall be either gas-fired or electric. Any boilers, local space heaters or CHP units that use solid biomass fuels (e.g. log wood, wood pellets, straw, olive stones etc.) shall be equipped with an electrostatic precipitator or similarly efficacious particulate emission abatement technology. Assessment and verification: The applicant shall provide a declaration of compliance, supported by a list and brief description of the boilers, combined heat and power units and local space heaters used in the tourist accommodation establishment. Descriptions shall include, as a minimum, the rated capacity (in kW), the manufacturer name, model name/number, and the type or types of fuel that can be used in the equipment. In cases, where solid- or liquid-based fossil fuels can technically be used by the biomass boilers or heaters, the applicant shall further declare on the explicit non-use of such fuels. In cases where solid biomass fuels are used, the description shall also include details of the exhaust gas abatement system.

1952

1953 EC4 (m): Building Automated Control System (BACS)

Annex I proposal for EC4 (Building Automated Control System (BACS))
Centralised heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation (HVAC) shall be linked to a building automation and control system (BACS). The BACS shall provide: - Central monitoring of energy consumption at building or subsystem level. - Fault detection and diagnostics. - Thermostatic and time-schedule control of heating and cooling. - Occupancy-based control of HVAC and lighting in guest rooms - Automatic optimisation of technical building systems. Within the main hours of business activity, the temperature in communal areas shall be regulated to no lower than 23 ±3°C when outdoor temperatures exceed 26°C and to no higher than 21 ±3°C when outdoor temperatures are lower than 18°C. Within guest rooms, temperature controls should enable a room air temperature to be maintained within the range of 18 to 26°C when windows are closed and guest controls are activated in the room. Interior lighting in low-traffic communal areas shall be programmed to dim and/or switch off unless triggered by motion sensors. Exterior lighting not needed for security reasons shall be programmed to switch-off during off-peak hours (for example 0000 to 0600). Such lighting may also be linked to motion sensors for switching on again. Assessment and verification: The applicant shall provide a declaration of compliance, together with a brief description of the BACS, its functional capabilities and setup in the establishment, including the temperature setpoint logic. This applicant declaration shall be supported by a declaration of the BACS supplier or installer. A copy of technical documentation for the BACS shall be provided to the competent body on request. If lighting controls are independent of the BACS, a separate declaration about interior and exterior lighting controls and off-peak switch-off programming shall be provided. The declaration shall include the

identification of the areas and number of approximate number of light points covered by the lighting switch-off system.

Annex III proposal for EC4 Lighting controls and thermoregulation

Note: These requirements only apply to communal buildings on the campsite and/or caravan park.
~~Centralised heating systems, air-conditioning systems, systems for combined space heating and ventilation, or systems for combined air conditioning and ventilation (HVAC) shall be linked to a building automation and control system (BACS). The BACS shall provide:~~

- ~~Central monitoring of energy consumption at building or subsystem level.~~
- ~~Fault detection and diagnostics.~~
- ~~Thermostatic and time-schedule control of heating and cooling.~~
- ~~Occupancy-based control of HVAC and lighting in guest rooms~~
- ~~Automatic optimisation of technical building systems.~~

Within the main hours of business activity, the temperature in communal areas shall be regulated to no lower than 23 ±3°C when outdoor temperatures exceed 26°C and to no higher than 21 ±3°C when outdoor temperatures are lower than 18°C.
~~Within guest rooms, temperature controls should enable a room air temperature to be maintained within the range of 18 to 26°C when windows are closed and guest controls are activated in the room.~~
~~Interior lighting in low-traffic communal areas shall be programmed to dim and/or switch off unless triggered by motion sensors.~~
Exterior lighting not needed for security reasons shall be programmed to switch-off during off-peak hours (for example 0000 to 0600). Such lighting may also be linked to motion sensors for switching on again.

Assessment and verification: The applicant shall provide a declaration of compliance, together with a brief description of ~~the BACS, its functional capabilities and setup in the establishment, including~~ the temperature setpoint logic, lighting programs and controls. ~~This applicant declaration shall be supported by a declaration of the BACS supplier or installer. A copy of technical documentation for the BACS shall be provided to the competent body on request.~~
~~If lighting controls are independent of the BACS, a separate declaration about interior and exterior lighting controls and off-peak switch-off programming shall be provided.~~ The declaration shall include the identification of the areas and number of approximate number of ~~interior and~~ exterior light points covered by the lighting switch-off system.

1954

1955 ## EC5 (m): Outdoor heating restrictions

Annex I proposal for EC5 (m) on outdoor heating

Outdoor air conditioning appliances shall not be used in the premises operated by the tourist accommodation enterprise. Outdoor space heating appliances shall not be used unless:

- The heaters use infra-red radiant heating technology.
- The heaters are situated in fully enclosable or partially enclosable* terraces or areas.
- The heaters are only operated when the terraces are fully or partially enclosed*, when nearby areas are occupied, and when requested by occupants.
- When the nearby area is unoccupied, the heaters and are either switched off or put into a reduced heat output mode.

* partially enclosable/enclosed refers to an overhead roof enclosure plus at least 80% of the total floor to roof perimeter area.
The heating of water in outdoor swimming pools or hot tubs shall not be permitted unless it uses direct solar radiation, geothermal heat or waste heat recovery as the heat sources.

Assessment and verification: The applicant shall provide a declaration of compliance, which shall entail either a simple declaration of non-use, or details of the outdoor space heating set-up. In the latter case, a description of the outdoor heated area shall be provided, together with images of the area, the enclosure features, heater locations and product manuals for the heater units.
Regarding the heating of outdoor pools or hot tubs, the applicant shall provide a declaration of compliance. In cases of any heated outdoor pools or hot tubs, a brief description of the heating system used shall be provided. Technical documentation demonstrating that the outdoor pool/hot tub water is heated by direct solar radiation, geothermal energy or waste heat recovery shall be provided to the competent body upon request.

Annex III proposal for EC5 (m) on outdoor heating

Note: This requirement does not extend to portable heating devices owned by tourists that are used for their own purposes on their pitches or in remote areas on the campsite or caravan park premises.

Outdoor air conditioning appliances shall not be used in the premises operated by the tourist accommodation enterprise. Outdoor space heating appliances shall not be used unless:

- The heaters use infra-red radiant heating technology.
- The heaters are situated in fully enclosable or partially enclosable* terraces or areas.
- The heaters are only operated when the terraces are fully or partially enclosed*, when nearby areas are occupied, and when requested by occupants.
- When the nearby area is unoccupied, the heaters and are either switched off or put into a reduced heat output mode.

* partially enclosable/enclosed refers to an overhead roof enclosure plus at least 80% of the total floor to roof perimeter area.
The heating of water in outdoor swimming pools or hot tubs shall not be permitted unless it uses direct solar radiation, geothermal heat or waste heat recovery as the heat sources.

Assessment and verification: The applicant shall provide a declaration of compliance, which shall entail either a simple declaration of non-use, or details of the outdoor space heating set-up. In the latter case, a description of the outdoor heated area shall be provided, together with images of the area, the enclosure features, heater locations and product manuals for the heater units.
Regarding the heating of outdoor pools or hot tubs, the applicant shall provide a declaration of compliance. In cases of any heated outdoor pools or hot tubs, a brief description of the heating system used shall be provided. Technical documentation demonstrating that the outdoor pool/hot tub water is heated by direct solar radiation, geothermal energy or waste heat recovery shall be provided to the competent body upon request.

EC8 (m): Carbon footprint of energy consumption

Annex I proposal for EC8 (m) on carbon footprint in TR1

Note: the underlying data for this criterion may be available already via reporting under EC1 and reporting on refrigerant charges under EC3.

Energy consumption in the tourist accommodation establishment shall be expressed in terms of carbon footprint by using one of the following approaches:

- In-house calculated carbon footprint according to the freely available Hotel Carbon Management Initiative (HCMI).
- Third-party certified scope 1 and scope 2 emissions according to the GHG protocol.

The scope of the calculation shall be clearly defined in terms of whether energy use for restaurants, MICE, laundry (in-house or outsourced) and leisure centres is included or not.
Results shall be expressed in absolute emissions, and emissions that are normalised per guest-night, per room-night and per m2 of internal conditioned floor area.

Assessment and verification: The applicant shall provide a declaration of compliance, supported by a copy of a completed assessment, together with the ingoing input data used for the calculation.

Annex III proposal for EC8 (m) on carbon footprint in TR1

No requirement – removed as part of simplifying requirements for campsites and caravan parks.

1958

1959 EC10 (o): Heat recovery

Annex I proposal for EC10 (o) for heat recovery

Note: A maximum of 3X points can be awarded via this criterion. Points awarded under the first and second items shall be in proportion to the share of guest rooms which are served by such devices.

The tourist accommodation establishment shall have ~~a~~ heat recovery system(s) in place to reduce space heating or water heating energy demand. The following heat recovery systems shall be recognised:

- Drain water heat recovery (DWHR) from shower/bath drain water and transfer to the cold-water inlet pipe in guest rooms (X points).
- Mechanical ventilation heat recovery (MVHR) from ventilation exhaust gas and transfer to inlet air (X points).
- Heat recovery from refrigeration units, dishwasher effluent and washing machine effluent to heat inlet water for laundry, swimming pool or general hot water supply (X points).

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance with one, two or all three types of heat recovery. Points awarded under the first point shall be proportional to the number of guest rooms with the heat recovery devices installed.
The applicant shall provide a brief description of the locations of the heat recovery devices, their manufacturer/supplier and model number, if present as standalone fittings. If directly incorporated into the centralised system, the part of the system technical manual that presents the heat recovery device shall be highlighted. The whole technical manual of heat recovery systems shall be provided to the competent body on request.

Annex III proposal for EC10 (o) for heat recovery

Note: A maximum of 3X points can be awarded via this criterion. Points awarded ~~under the first and second items~~ shall be in proportion to the share of shower units~~guest rooms~~ which are served by such devices.

The tourist accommodation establishment shall have ~~a heat recovery system(s) in place to reduce space heating or water heating energy demand. The following heat recovery systems shall be recognised~~Dd rain water heat recovery (DWHR) from shower~~/bath~~ drain water and transfer heat to the cold-water inlet pipe for showers~~in guest rooms~~ (3X points).

- ~~Mechanical ventilation heat recovery (MVHR) from ventilation exhaust gas and transfer to inlet air (X points).~~
- ~~Heat recovery from refrigeration units, dishwasher effluent and washing machine effluent to heat inlet water for laundry, swimming pool or general hot water supply (X points).~~

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance ~~with one,two or all three types of heat recovery. Points awarded under the first point shall be proportional to the number of guest rooms with the heat recovery devices installed.~~

~~The applicant shall provide~~ supported by a brief description of the locations and numbers of shower units and how many of them are served by~~, of the~~ heat recovery devices, their manufacturer/supplier and model number(s). ~~If directly incorporated into the centralised system, the part of the system technical manual that presents the heat recovery device shall be highlighted.~~ The whole technical manual of heat recovery systems shall be provided to the competent body on request.

1960

1961 EC11 (o): Low GWP refrigerants

Annex I proposal for EC11 (o) on low GWP refrigerants
Note: A maximum of X points can be awarded under this criterion. Points will be awarded in proportion to the share of low GWP or very low GWP refrigerants (on a % mass or volume basis) used in the heat pump and air conditioning systems. Refrigerants used in the tourist accommodation establishment are: — Low GWP refrigerants (GWP < 150) (up to 0.5X points). — Very low GWP refrigerants (GWP < 10) (up to X points). Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide an inventory of the current refrigerant charges (quantities) currently estimated to be present in the tourist accommodation establishment. The technical name, shorthand chemical name, CAS number and associated GWP value shall be provided for each refrigerant. Based on this information, the applicant shall provide an approximate estimation of the total % shares of low GWP and very low GWP refrigerants in use.
Annex III proposal for EC11 (o) on low GWP refrigerants
No requirement – removed as part of simplifying requirements for campsites and caravan parks.

1962

1963 EC12 (o): Onsite renewable electricity generation

Annex I proposal for EC12 (o) on onsite renewable electricity generation
Note: A minimum of 0.2X points and a maximum of X points shall be awarded under this criterion. Points will be awarded in proportion to the where the exact share of self-consumed onsite (generated) renewable electricity (SCORE) lies in between the 10% and 50% thresholds. The scope of reporting should ideally match to the scope of the monitoring system implemented under EC1 and ideally use data that is automatically logged by the BACS in EC4. Considering the overall annual data, the share of SCORE shall be at least 10% of total electricity consumption. $$Annual\ SCORE = \sum_{n=1}^{12} \frac{monthly\ SCORE_n}{monthly\ SCORE_n + purchased\ electricity_n}$$

Maximum points shall be awarded when onsite renewable electricity accounts for an effective 50% of consumption.

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance, supported by monthly data for:

- Onsite generated renewable electricity (in kWh or MWh), split into self-consumed (SCORE) and exported fractions.
- Purchased electricity (in kWh or MWh).

An annual calculation of onsite generated renewable electricity and purchased electricity consumption, based on the sums of relevant monthly data, shall also be provided.

Biomass energy can only be counted as contributing to "onsite generated renewable electricity" if it is used in onsite CHP units. In this case, only the electricity output shall be counted, not the thermal output.

Annex III proposal for EC12 (o) on onsite renewable electricity generation and storage

Note: A minimum of ~~0.2~~X points and a maximum of 5X points shall be awarded under point (a) of this criterion. Points will be awarded in proportion to the where the exact share of self-consumed onsite (generated) renewable electricity (SCORE) lies in between the ~~1~~20% and 100% thresholds. The scope of reporting should ideally match to the scope of the monitoring system implemented under EC1 and ideally use data that is automatically logged by the BACS in EC4.

(a) Considering the overall annual data, the share of SCORE shall be at least ~~1~~20% of total electricity consumption.

$$Annual\ SCORE = \sum_{n=1}^{12} \frac{monthly\ SCORE_n}{monthly\ SCORE_n + purchased\ electricity_n}$$

Maximum points shall be awarded when onsite renewable electricity accounts for an effective ~~50~~100% of consumption.

(b) A further X points shall be awarded if the campsite and/or caravan park has onsite energy storage infrastructure (for example via batteries, hydrogen fuel cells or other means) that is able to store at least 24 hours of typical electricity demand during peak tourist season.

(c) A further 4X points shall be awarded in cases where the campsite and/or caravan park is connected to the electrical grid with infrastructure that enables the export of excess renewable electricity that is generated onsite.

Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of compliance, supported by the following information.

For point (a)~~, monthly data for~~:

- Monthly data for o~~O~~nsite generated renewable electricity (in kWh or MWh), split into self-consumed (SCORE) and exported fractions.
- Monthly data for p~~P~~urchased electricity (in kWh or MWh).
- An annual calculation of onsite generated renewable electricity and purchased electricity consumption, based on the sums of relevant monthly data, shall also be provided.
- Biomass combustion can only be counted as contributing to "onsite generated renewable electricity" if it is used in onsite CHP units. In this case, only the electricity output shall be counted, not the thermal output.

1964

EC14 (o): Mini-bar, coffee machine and kettle restrictions

Annex I proposal for (EC14 (o)) on mini bar restrictions in TR1
Note: A minimum of 0.1X points and a maximum of X points can be awarded under this criterion. Points will be awarded in proportion to the share of guest rooms without a mini bar. At least 10% of the guest rooms shall have no mini bar, coffee machine or kettle. Alternative means of the convenient procurement of snacks, drinks, coffee or hot water for tea by guests may be provided via vending machines (maxi-bar concept) located in communal areas near guest rooms. Assessment and verification: In cases where points are being claimed under this criterion, the applicant shall provide a declaration of the extent of use of mini bars, coffee machine and kettles in guest rooms.
Annex III proposal for (EC14 (o)) on mini bar restrictions in TR1
No requirement – removed as part of simplifying requirements for campsites and caravan parks.

Rationale for Theme 2

Regarding EC2, due to the nature of tourism in campsites and caravan parks, it was considered necessary to nuance the requirements relating to the use of fuels and controls on exhaust gas emissions from biomass combustion. Tourists at these establishments will often bring their own cooking gear and portable stoves for an outdoor experience.

The EU Ecolabel restrictions should not unnecessarily impinge on tourist-owned equipment. Likewise, particulate emission control on outdoor campfires is considered futile due to the absence of any channeled flue for exhaust gases. Nonetheless, restrictions remain in place for equipment for indoor space heating and for water heating that is owned by the tourist establishment. Due to their added potential importance and intensity of use, an additional restriction on establishment-owned grills and barbeques has been imposed for campsites and caravan parks – they must be gas-fired or electric. This is in order to restrict emissions of air pollutants, which are generally higher under the non-optimal combustion conditions that typically occur in barbeques and grills.

Regarding EC4, a simplified approach is taken to temperature and lighting controls compared to large hotels. The scope is first limited to communal buildings. In these communal buildings, the size of HVAC systems will normally be too small to justify the investment in BACS. Thermoregulation is also of limited importance for the tourists who will be staying in tents or caravans. However, exterior lighting controls may be important in terms of energy consumption and definitely in terms of light pollution.

Regarding EC5, a note has been inserted to make it clear that the restriction on outdoor heating appliances does not extend to tourist-owned appliances. Outdoor heating is an important part of the campsite or caravan park experience.

Regarding EC8, the requirement to report on the carbon footprint is a logical extension of the existing requirements to monitor energy consumption in EC1 and keep records of refrigerant charges (in EC3). Even though the HCMI tool is free to use, it may result in an additional administrative burden for campsite and caravan park owners.

Regarding EC10, the requirements on heat recovery have been simplified to focus only on the recovery of heat from shower drain water. This will be by far the biggest opportunity for heat recovery in campsites and caravan parks and so all the points available should focus on this particular mechanism of heat recovery.

Regarding EC11, the quantities of refrigerants involved are likely to be very low. Therefore this optional requirement for low GWP refrigerants is proposed to be removed due to its limited benefit.

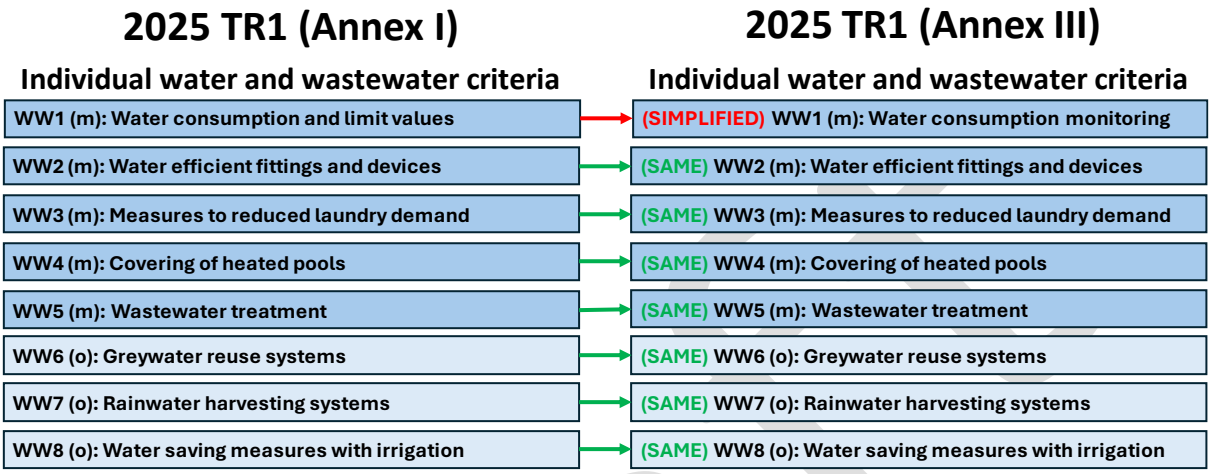
Regarding EC12, the requirements for onsite renewable electricity generation are more extensive and more ambitious for campsites and caravan parks. The main reason for this is that these types of accommodation have a much greater opportunity to be self-sufficient in onsite generated renewable electricity. First of all, there should be plenty of space for any onsite PV or micro wind turbines. Secondly, this type of tourist accommodation has a lower intensity of electricity consumption compared to hotels (as indicated from limited EUEL licence holder data in Figure 28). Depending on the location of the campsite or caravan park, net export of electricity could become an important revenue stream, especially during the off-season.

Regarding EC14, the criterion on mini-bars, coffee machines and kettles has been removed due to the lack of relevance to campsite and caravan park accommodation.

Theme 3: Water and wastewater

The requirements in Annex III are effectively the same as for Annex I but with the one difference illustrated below.

Figure 23. Comparison of the criteria requirements/structure for the water and wastewater theme for Annex I (large) and Annex III campsite and/or caravan park accommodation.



Source: Own elaboration.

WW1 (m): Water consumption monitoring

Annex I proposal for WW1 (Water consumption monitoring)

The applicant shall report on metered water consumption with a monthly resolution and overall annual value according to the table below. ~~Reported data shall cover all parts of the hotel that are related to tourist accommodation, but shall separately report consumption by additional services such as restaurants, leisure facilities, and MICE.~~

All cold water systems and related sanitary fittings shall be regularly inspected by in-house staff for leaks and repair measures taken as needed.

Table X. Water consumption reporting template for one year

Parameter	J	F	M	A	M	J	J	A	S	O	N	D	Year
Total metered mains water (m3)													
Total metered abstracted water (m3)*													
Total guest-nights													
Total room-nights													
Specific total water consumption (L/guest-night, /room-night)													

*abstracted water refers to the private and legal supply of water from local groundwater tables or surface water bodies supplied directly to the tourist accommodation establishment.

~~Monitoring does not extend to flows in greywater circuits, rainwater harvesting systems or recirculation loops in HVAC or heat recovery systems.~~

Assessment and verification: The applicant shall provide a declaration of compliance, supported by a monitoring report that is based on records of meter readings taken as part of an in-house water monitoring system. These records shall be supported by utility invoices, as appropriate, and provided upon request by the competent body.

~~Water consumed by additional services such as restaurants, in-house laundry, leisure facilities, MICE and irrigation can be deducted from the calculation is suitable sub-metering is in place. The inclusion of any of these additional services in the water consumption reporting must be clearly stated.~~

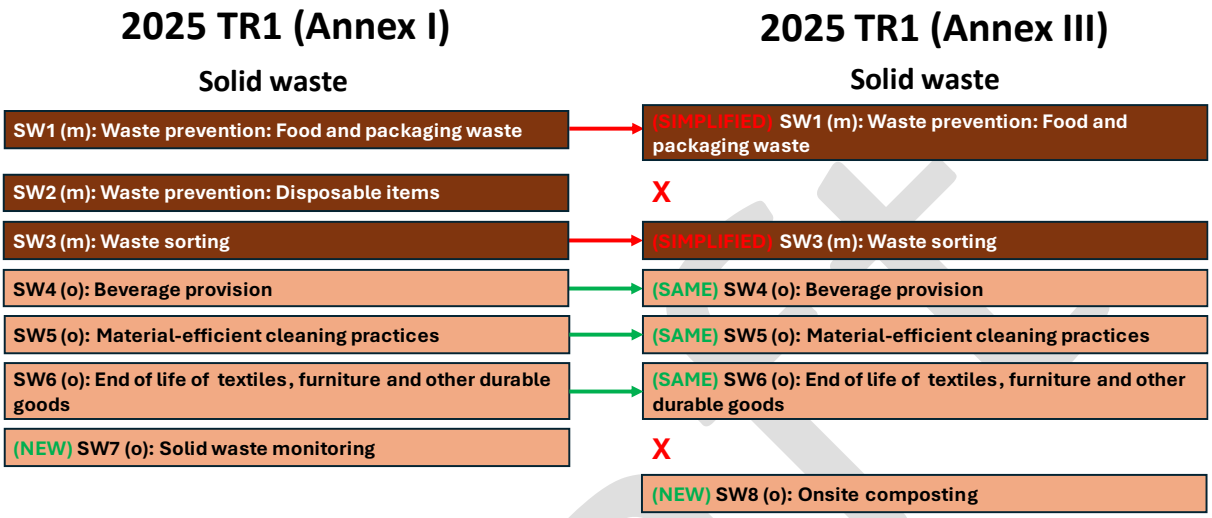
Rationale for Theme 3

For campsites, water use per overnight stay is maintained as the main metric because it allows benchmarking similar to hotels. However, campsites often have shared facilities, variable group sizes, and day visitors. The wording specifies that only overnight guests are included in the main metric, with optional separate reporting for day-use water. Monthly recording is retained but procedures are simplified to reflect limited staff and infrastructure. Requirements on private wells are retained but only applied if relevant. Overall, the adaptation keeps monitoring feasible while maintaining the possibility for tracking performance and setting future benchmarks.

Theme 4: Solid Waste

The requirements in Annex III are effectively the same as for Annex I but with the one difference illustrated below.

Figure 24. Comparison of the criteria requirements/structure for the solid waste theme for Annex I (large) and Annex III campsite and/or caravan park accommodation.



Source: Own elaboration

The rationale for this theme in Annex III aligns with the principles established in Annex I but incorporates specific adaptations to address the unique operational context of camping ecolabel accommodations.

The biggest changes are the removal of SW2 and SW7. The latter has been removed for the same reasons as already specified in the equivalent part of Annex II. The removal of SW2 is due to the nature of tourists arriving at campsites and caravan parks. They will normally bring their own personal items, like razors, toothpaste and so on. If they need replacements or more supplies, they would seek to purchase more, either at a shop or vending machine at the establishment itself, or at a nearby shop. Disposable versions of these items are not normally provided to campsite or caravan park guests in any case.

The simplifications of SW1 and SW3 are presented further below, together with a completely new requirement relating to onsite composting of biodegradable waste. The rationale for these changes comes afterwards.

SW1 (m): Waste prevention: Food and packaging waste

Annex I proposal for SW1 (Waste prevention: Food and packaging waste) in TR1
Without prejudice to the local or national regulation on provision of food services: a) With the aim to reduce package waste: No single dose packages for non-perishable food stuffs (e.g. coffee, sugar, chocolate powder (except tea bags)) shall be used for food services. b) With the aim to reduce package/food waste no single dose package for all perishable food stuffs (e.g. Yogurt, jams, honey, cold meats, pastries),shall be used for food services. The tourist accommodation shall follow a documented procedure linked to the action program (criterion GM1) which specifies all product types used.

c) Use of disposable capsules for coffee machines in guest rooms and/or in the corridor, shall only be permitted if the capsules consist of minimum 75% recycled or 100% renewable material.

Exempt from this criterion are: shops and vending machines under management of the tourist accommodation and single-dose sugar and/or coffee inside rooms under the condition that the products used for this purpose is fair trade and/or organic certificated.

Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and the documented procedure which outlines how both food and packaging waste are minimised. Where coffee capsules are used, the applicant shall provide a declaration describing capsule material and the recycling process of the capsules, together with confirmation from the recycling operator verifying that the capsules are recycled. Any legislation requiring the use of single dose products shall also be provided. If applicable, documentation to demonstrate the conditions required in the exemption shall be provided (e.g.~~,~~ organic and/or fair trade packaging label). This will be moreover checked during the on-site visit.
Perishable food is defined as being subject to decay or destruction, usually food that has been, for example minimally processed or not otherwise preserved and which relies on refrigerated storage in order to reduce the rate of decay and loss of quality (Codex Alimentarius).

Annex II proposal for SW1 (Waste prevention: Food and packaging waste) in TR1

Without prejudice to the local or national regulation on provision of food services,~~a)With the aim to reduce package waste: N~~no single dose packages for non-perishable food stuffs (e.g. coffee, sugar, chocolate powder (except tea bags)) shall be used for food services.

~~c) With the aim to reduce package/food waste no single dose package for all perishable food stuffs (e.g. Yogurt, jams, honey, cold meats, pastries),shall be used for food services. The tourist accommodation shall follow a documented procedure linked to the action program (criterion GM1) which specifies all product types used.~~

~~d) Use of disposable capsules for coffee machines in guest rooms and/or in the corridor, shall only be permitted if the capsules consist of minimum 75% recycled or 100% renewable material.~~

Exempt from this criterion are~~: shops and vending machines under management of the tourist accommodation and~~ single-dose sugar and/or coffee inside rooms under the condition that the products used for this purpose is fair trade and/or organic certificated.

Assessment and verification: The applicant shall provide a declaration of compliance with the criterion and a supporting explanation.~~the documented procedure referred to in point b), which outlines how both food and packaging waste are minimised.~~ Any legislation requiring the use of single dose products shall also be provided. If applicable, documentation to demonstrate the conditions required in the exemption shall be provided (e.g. ~~take back declaration from coffee capsules producer,~~ organic and/or fair trade packaging label). This will be moreover checked during the on-site visit.
~~For the purposes of this criterion, P~~perishable food is defined as being subject to decay or destruction, usually food that has been, for example minimally processed or not otherwise preserved and which relies on refrigerated storage in order to reduce the rate of decay and loss of quality (Codex Alimentarius).~~
~~Regarding point c) where coffee capsules are used, the applicant shall provide a declaration describing capsule material and the recycling process of the capsules, together with confirmation from the recycling operator verifying that the capsules are recycled.~~
~~If any exemptions apply to points a), b) or c), the applicant shall explain these in writing, supported by photos and references to any relevant legislation, as needed.~~

2051

2052 ## SW3 (m): Waste sorting

Annex I proposal for SW3 (Waste sorting) in TR1

Without prejudice to local or national regulations on waste separation, the tourist accommodation establishment shall provide containers for the separate disposable of the following types of waste:

- Sanitary waste in the guest bathrooms and public toilets.
- Plastic containers and packaging in guest rooms and public areas.
- Paper and cardboard in guest rooms and public areas.

- Glass containers in guest rooms and public areas.
- Compostable biogenic waste (uncooked or non-meat/non-fish food waste, coffee grinds, garden waste), in kitchen areas and public areas.
- Small waste electrical and electronic equipment in public areas.
- Textile waste in backroom areas.
- Used cooking oil in kitchen areas.
- Unsorted other waste, in public areas.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the waste separation system, the approximate number of bins and their locations, and how each of the different waste fractions are dealt with.
This shall be checked during the onsite visit. In cases where certain categories of waste are not accepted by the local authorities, and relevant waste contractors, the separate collection of those fractions in the list above may be exempted from this criterion.

Annex II proposal for SW3 (Waste sorting) in TR1

Without prejudice to local or national regulations on waste separation, the tourist accommodation establishment shall provide containers for the separate disposable of the following types of waste:

- Sanitary waste in the guest bathrooms and public toilets.
- Plastic containers and packaging in ~~guest rooms and~~ public areas.
- Paper and cardboard in ~~guest rooms and~~ public areas.
- Glass containers in ~~guest rooms and~~ public areas.
- Compostable biogenic waste (uncooked or non-meat/non-fish food waste, coffee grinds, garden waste), in kitchen areas ~~and~~ and public areas.
- Small waste electrical and electronic equipment in public areas.
- Textile waste in ~~backroom~~ public areas.
- Used cooking oil in kitchen areas.
- Used motor oil in public areas.
- Unsorted other waste, in public areas.
- Chemical waste disposal points in public areas for caravan toilets.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the waste separation system, the approximate number of bins and their locations, and how each of the different waste fractions are dealt with.
This shall be checked during the onsite visit. In cases where certain categories of waste are not accepted by the local authorities, and relevant waste contractors, the separate collection of those fractions in the list above may be exempted from this criterion.

SW8 (o): Onsite composting

Annex I proposal on SW8 (about onsite composting) in TR1

No existing requirement

Annex III proposal on SW8 (about onsite composting) in TR1

Placeholder here, but to be discussed with stakeholders about what a meaningful set of criteria and assessment and verification text would look like for this.

Rationale for Theme 4

Regarding SW1, the requirements have been greatly simplified by focusing only on the avoidance of single-use packaging in non-perishable items. This provides a certain degree of flexibility to smaller

tourist accommodation providers about how to deal with the logistics of the perishable goods provided to guests and which options are available to buy from suppliers.

Regarding SW3, the whole requirement to separately collect textile wastes is reintroduced because the likelihood of municipal kerbside bins being available is slim. Any reference to bins in "guest rooms" does not make much sense for the campsite and/or caravan park type tourist accommodation, so that is the reason for removing those details. The collection of waste motor oil has also been inserted due to its potential relevance for guests – as has a point regarding the disposal of chemical waste from caravan toilets.

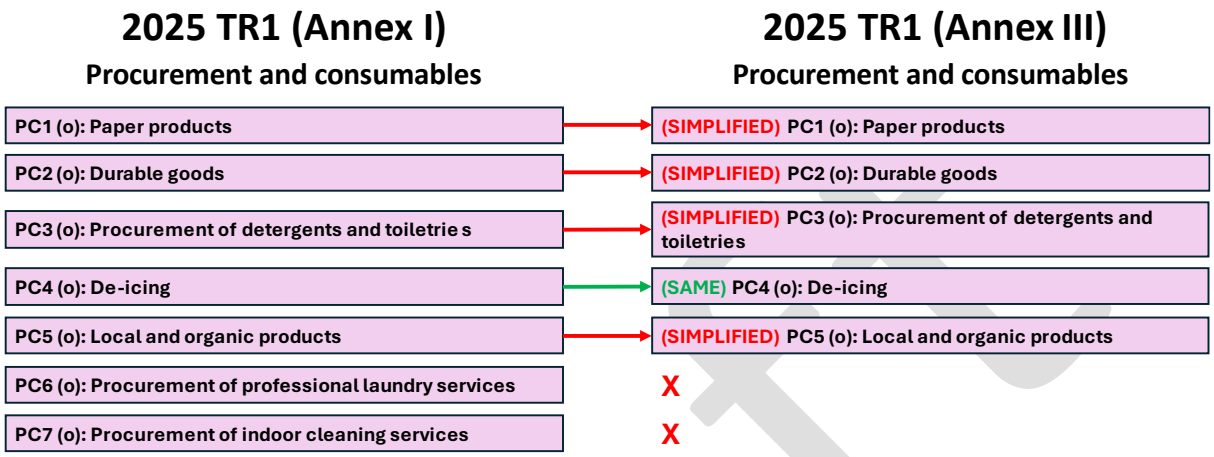
Regarding SW8, onsite compositing of biodegradable waste at campsites and caravan parks is an attractive option in terms of the availability of suitable land, the potential cost savings in waste management, the potential improvement of local soil quality and the opportunity to provide a hands-on and real-life environmental experience to guests.

Biodegradable waste could be limited to food waste and garden waste, or it could also extend to organic residues from onsite toilets (either directly or via sludge generated after initial treatment in package plant). There are a wide range of different composting techniques and technologies available that may be more or less suitable for this particular circumstance. Consequently, it is proposed to discuss in more detail with stakeholders on this point before making a full proposal, which will come in TR2.

Theme 5: Procurement and consumables

A comparison of the individual criterion headings in Annex I and Annex II under the theme of "procurement and consumables" are illustrated below.

Figure 25. Comparison of procurement and consumables criteria requirements/structure under Annex I (large) and Annex III campsite and/or caravan park accommodation.



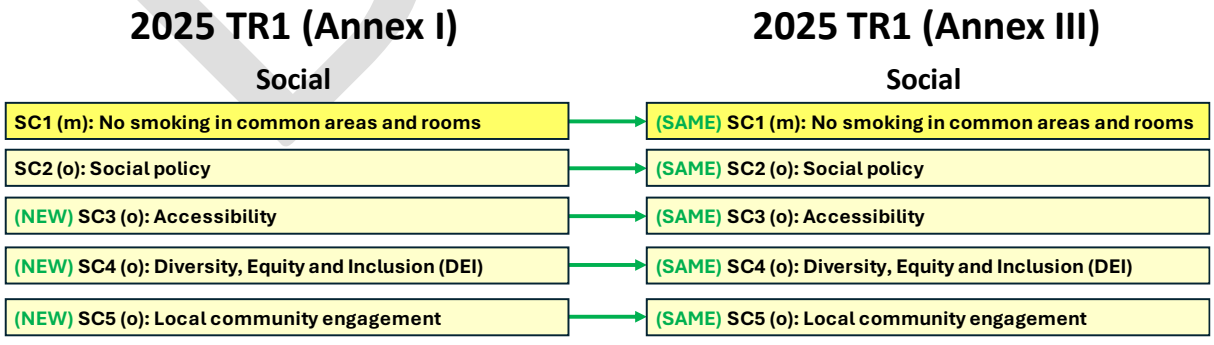
Source: Own elaboration

As shown above, there are many changes between Annex I and Annex III. However, these changes are in fact identical to the differences between Annex I and Annex II and have already been explained in the equivalent Annex II section on theme 5. Consequently, there is no need to repeat the points here.

Theme 6: Social

A comparison of the individual criterion headings in Annex I and Annex III under the theme of "social" are illustrated below.

Figure 26. Comparison of criteria requirements/structure for the social theme for Annex I (large) and Annex III campsite and/or caravan park accommodation.



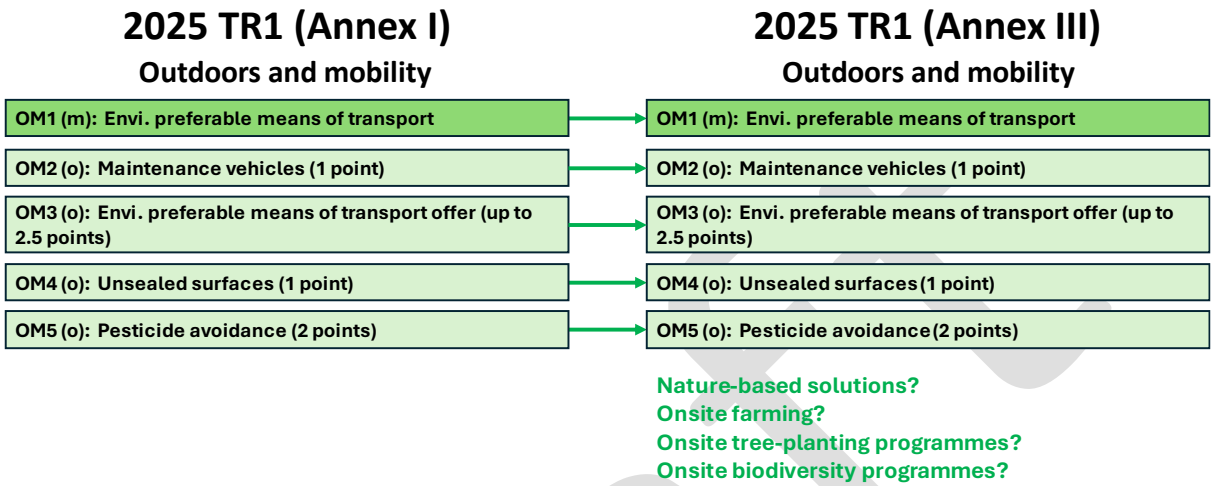
Source: Own elaboration

Since the requirements are the same, there is nothing further to report on theme 6 in Annex II.

Theme 7: Outdoors and mobility

A comparison of the individual criterion headings in Annex I and Annex III under the theme of "outdoors and mobility" are illustrated below.

Figure 27. Comparison of criteria requirements/structure for the outdoors and mobility theme for Annex I (large) and Annex III campsite and/or caravan park accommodation.



Source: Own elaboration

Since the requirements are only placeholders, there is nothing much to say at this point in TR1, but rather for discussion and exchanges of ideas with stakeholders.

Conclusions

This Technical Report provides the first consolidated technical basis for the revision of the EU Ecolabel criteria for Tourist Accommodation Services. It confirms that the existing criteria, adopted in 2017, continue to address many of the most relevant environmental aspects of the sector, but also demonstrates clearly that targeted revisions are necessary to maintain their relevance, credibility and effectiveness in a rapidly evolving market and policy context.

The evidence reviewed in this report shows that energy use, water consumption and waste generation remain the dominant environmental impact drivers across different types of tourist accommodation. Life cycle assessment literature, the in-depth review of the Product Environmental Footprint Category Rules (PEFCR) for hotels, and available benchmarking data consistently identify climate change and fossil resource use as the most significant impact categories, with electricity demand, heating and hot water provision, and laundry services playing a central role. These findings confirm that the strategic focus of the EU Ecolabel criteria remains appropriate, while also highlighting areas where stronger alignment with life-cycle hotspots and best available practices can improve environmental effectiveness.

At the same time, the analysis highlights substantial heterogeneity within the tourist accommodation sector. Environmental performance varies widely depending on accommodation type, size, climate, service offer and operational practices. This diversity creates challenges for the design of criteria that are simultaneously ambitious, fair and implementable. The stakeholder feedback and data analysis presented in this report underline the need for clearer definitions, more precise consumption monitoring requirements, and greater differentiation between accommodation types where justified. Improving clarity in assessment and verification is also essential to ensure consistent implementation by competent bodies and to reduce administrative burden for applicants, particularly micro and small enterprises.

The review of the current criteria identifies several areas where updating or restructuring is warranted. In some cases, requirements have become outdated due to technological progress or evolving policy frameworks. In others, criteria impose reporting or documentation obligations that may no longer deliver proportionate environmental benefits. Conversely, the analysis also identifies opportunities to strengthen requirements related to energy management, building automation and control, water efficiency and waste prevention, drawing on best environmental management practices and experience from other ecolabel schemes.

In response to these findings, this report proposes an initial restructuring of the criteria into thematic areas, accompanied by revised criterion texts, rationales and assessment and verification approaches. The objective is to improve transparency, usability and coherence, while ensuring that the criteria continue to reflect the EU Ecolabel's ambition of identifying environmental excellence. These proposals are intentionally presented at an early stage, recognising that further refinement is required through structured stakeholder consultation and additional technical analysis.

Overall, this TR1 confirms the continued relevance of the EU Ecolabel as a voluntary policy instrument to support more sustainable tourist accommodation services and to provide reliable information to consumers. It sets the scene for the first Ad-Hoc Working Group meeting and subsequent consultation phases, during which the proposed revisions will be tested, challenged and improved. The next steps will focus on refining the criteria based on stakeholder input, strengthening the evidence base where needed, and ensuring that the revised EU Ecolabel criteria are robust, future-proof and aligned with broader EU sustainability objectives.

2147 # References

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2152

List of abbreviations

Abbreviations

B&B	Bed and Breakfast
CBs	Competent Bodies
CE	Collaborative Economy
CEAP	Circular Economy Action Plan
CFF	Circular Footprint Formula
CSR	Corporate Sustainability Reporting
CSRD	Corporate Sustainability Reporting Directive
EC	European Commission
EED	Energy Efficiency Directive
EMAS	Eco-Management and Audit Scheme
EU	European Union
EUEL	EU Ecolabel
FU	Functional Unit
GHG	Greenhouse Gas
GPP	Green Public Procurement
GSTC	Global Sustainable Tourism Council
GWP	Global Warming Potential
HVAC	Heating, Ventilation, and Air Conditioning
IAQ	Indoor Air Quality
JRC	Joint Research Centre
LCA	Life Cycle Assessment
LCEA	Lifecycle Energy Analysis

LCI	Life Cycle Inventory
LCIA	Life Cycle Impact Assessment
NACE	Statistical classification of economic activities (Nomenclature statistique des activités économiques dans la Communauté européenne)
NGO	Non-governmental organisation
OTA	Online Travel Agencies
PEE	Primary Energy Efficiency
PEF	Product Environmental Footprint
PEFCR	Product Environmental Footprint Category Rules
SDGs	Sustainable Development Goals
STRs	Short-Term Rentals
SUPD	Single-Use Plastics Directive
TAS	Tourist Accommodation Services
TS	Technical Secretariat
UBA	German Environment Agency
VOCs	Volatile Organic Compounds
WELL	WELL Building Standard
WFD	Waste Framework Directive
WTTC	World Travel and Tourism Council
ZPAP	Zero Pollution Action Plan

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Appendices

Appendix 1. Eurostat definitions of relevant NACE codes in 2014 and 2025

In relation to the relevant NACE codes mentioned in the scope and definition proposals are reproduced here for ease of reference. The definitions from both 2014 and 2025 are presented as well, so that recent changes can be seen.

Table 17. Comparison of definitions of relevant NACE codes for tourist accommodation by Eurostat

Methodological manual for tourism statistics (version 3.1) (Eurostat, 2014)	NACE Rev. 2.1 – Statistical classification of economic activities in the European Union (Eurostat, 2025)
55.10 Hotels and similar accommodation This class includes the provision of accommodation, typically on a daily or weekly basis, principally for short stays by visitors. This includes the provision of furnished accommodation in guest rooms and suites. Services include daily cleaning and bed-making. A range of additional services may be provided such as food and beverage services, parking, laundry services, swimming pools and exercise rooms, recreational facilities as well as conference and convention facilities. This class includes accommodation provided by: - hotels (and similar establishments, for instance operating under the name 'bed & breakfast') - resort hotels - suite/apartment hotels - motels This class excludes provision of homes and furnished or unfurnished flats or apartments for more permanent use, typically on a monthly or annual basis (see division 6850 of NACE). - The decisive component of this class is a provision of complementary services especially regular cleaning and bed-making on a daily basis. - Establishments that are excluded from this class and should be classified as NACE 55.2 can offer limited complementary services such as cleaning but not on a daily basis (cleaning once per week, for instance).	55.10 Hotels and similar accommodation This class includes the provision of accommodation, typically on a daily or weekly basis, for short-term stays. It also includes the provision of furnished accommodation in hotels rooms and suites. Services provided include daily cleaning and bed-making. A range of additional services may be provided (for example, food and beverage services, laundry services, recreational facilities as well as conference and convention facilities). These activities are generally characterised by the provision of on-the-spot customer service. This class includes accommodation provided by, for example: – hotels – resort hotels – suite/apartment hotels This class excludes: – accommodation without daily cleaning, bed-making and on-the-spot customer service, see 55.20 – intermediation service activities for accommodation, see 55.40
55.20 Holiday and other short-stay accommodation This class includes the provision of accommodation, typically on a daily or weekly basis, principally for short stays by visitors, in self-contained space consisting of complete furnished rooms or areas for living/dining and sleeping, with cooking facilities or fully equipped kitchens. This may take the form of apartments or flats in small free-standing multi-storey buildings or clusters of buildings, or single storey bungalows, chalets, cottages and cabins. Very minimal complementary services, if any, are provided. This class includes accommodation provided by:	55.20 Holiday and other short-stay accommodation This class includes the provision of short-term accommodation, typically on a daily or weekly basis, in self-contained furnished rooms or areas for living/dining and sleeping. Typically, no on-the-spot customer service and minimal complementary services, if any, are provided. This class includes accommodation in, for example: – holiday homes and apartments – visitor flats and bungalows – cottages and cabins without housekeeping services – hostels – bed and breakfast units

Methodological manual for tourism statistics (version 3.1) (Eurostat, 2014)	NACE Rev. 2.1 – Statistical classification of economic activities in the European Union (Eurostat, 2025)
- holiday homes for children and other holiday homes - visitor flats and bungalows - cottages and cabins without housekeeping services - youth hostels and mountain refuges This class excludes: - provision of furnished short-stay accommodation with daily cleaning, bed-making, food and beverage services (see 55.10 of NACE) - provision of homes and furnished or unfurnished flats or apartments for more permanent use, typically on a monthly or annual basis (see division 68 of NACE) The modality of the booking of the accommodation (e.g. using airbnb.com) has no effect on the classification. While this can also apply to NACE 55.1 and NACE 55.2, this is in particular relevant for NACE 55.2.	– guest rooms provided by private households – mountain huts and lodges This class excludes: – accommodation with daily cleaning, bed-making and on-the-spot customer service, see 55.10 – intermediation service activities for accommodation, see 55.40
55.30 Camping grounds, recreational vehicle parks and trailer parks This class includes: - provision of accommodation in campgrounds, trailer parks, recreational camps and fishing and hunting camps for short stay visitors - provision of space and facilities for recreational vehicles This class excludes mountain refuge, cabins and hostels (see 55.20 of NACE)	55.30 Camping grounds and recreational vehicle parks This class includes: – provision of short-term accommodation in camping grounds (e.g. recreational camps, fishing and hunting camps) – provision of space and facilities for recreational vehicles This class also includes: – glamping accommodation – accommodation provided by protective shelters or plain bivouac facilities This class excludes: – intermediation service activities for accommodation, see 55.40
	55.40 Intermediation service activities for accommodation This class includes the intermediation of all types of accommodation by bringing clients and service providers together for a fee or commission. These intermediation activities can be carried out on digital platforms or through non-digital channels (phone, post, and so on). The fee or commission can be received from either the client or the provider of the accommodation. Revenue for the intermediation activities can include other sources of income (for example, revenues from the sale of advertising space). This class also includes: – timeshare exchange services – reservation services for accommodation This class excludes: – units that provide reservation services alongside additional accommodation advice or expertise, see 79.11

Methodological manual for tourism statistics (version 3.1) (Eurostat, 2014)	NACE Rev. 2.1 – Statistical classification of economic activities in the European Union (Eurostat, 2025)
	– intermediation or sale of a combination of accommodation, travel and food, i.e. travel agencies and tour operators, see 79.11, 79.12
	55.90 Other accommodation This class includes the provision of temporary accommodation in homes, flats or apartments, as well as single or shared rooms or dormitories for students, seasonal workers and other individuals. This class includes accommodation in: – homes and furnished or unfurnished flats or apartments, for a period shorter than a year – dormitories for workers – boarding houses – student accommodation provided for less than one year at a time – railway sleeping cars when not operated by railway companies This class excludes: – operation of railway sleeping cars as an integrated operation of railway companies, see 49.11 – operation of cruise ships, see 50.10, 50.30 – intermediaries for accommodation, see 55.40 – all forms of accommodation for a period of one year or longer, see 68.20 – intermediation or sale of a combination of accommodation, travel and food, i.e. travel agencies and tour operators, see 79.11, 79.12

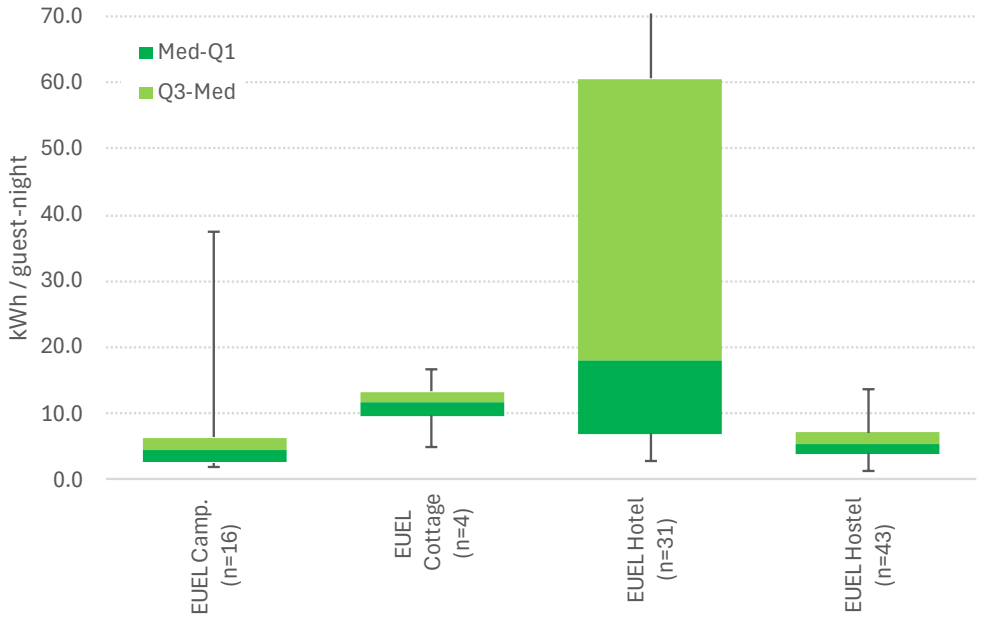
Sources: Eurostat (2014) Methodological manual for tourism statistics, doi:10.2785/892233
Eurostat (2025) NACE Rev. 2.1 – Statistical classification of economic activities in the European Union, doi:10.2785/155339

Appendix 2. Summary of relevant data from energy consumption monitoring

The content of this section is related to background research for EC1 and consists of an analysis of data provided by competent bodies regarding current EU Ecolabel licenced tourist accommodation, and an analysis of the latest CHSB data (2024 dataset).

Energy consumption data obtained from EU Ecolabel licence holders: Criterion 5(a) sets requirements on the gathering of specific energy use data "kWh/guest-night and/or kWh/m2 indoor floor area/yr)". Around 900 tourist accommodation establishments currently hold the EU Ecolabel. A request made by the JRC to competent bodies resulted in the submission of 94 distinct data points. Some of the data points were for the same establishment but for different years. Different sub-categories were also provided for the data points, as indicated in the graph below.

Figure 28. Reported specific energy consumptions in EU Ecolabel tourist accommodation licences in response to criterion 5 of Commission Decision (EU) 2017/175.



Source: JRC analysis of anonymised data provided by competent bodies

The box and whisker plot above shows the middle 50% of values in the boxes (1st to 2nd quartile range in dark green, 2nd to 3rd quartile range in light green) and the whiskers extend to the highest and lowest values. The highest value for hotels was 105 kWh/guest-night.

The data show that energy consumption for hotels is both significantly higher and much more variable when compared to other sub-categories of tourist accommodation. The existing criterion 5(a) was not very specific in terms of defining the scope of energy consumption to be reported. Therefore much of the variation could be due to different interpretations of what consumption is to be counted and/or due to the nature of additional services included in accounting. The proposal is therefore much more specific about what is to be accounted.

A closer look at the User Manual template for the existing EU Ecolabel criteria implies that reporting is only for electricity and not "energy", which would normally be considered to include fuel and electricity. A screenshot from the existing User Manual is provided below.

Figure 29. Screenshot from UM regarding energy use reporting

TOURIST ACCOMMODATION – CONSUMPTION TABLES

Energy use

Year of reference	
Total surface in m² of indoor area	

Energy use	Measure	Month												Total/year	Total/year*
		january	february	march	april	may	june	july	august	september	october	november	december		
Date	dd/mm/yyyy													-	
Total electricity consumption	kWh													0	
Guest-night	n.													0	
Total electricity consumption per guest-night	kWh/guest-night	#DIV/0!	#DIV/0!	#DIV/0!	####	####	####	####	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Total electricity consumption per m2 of indoor area	kWh/m²	#DIV/0!	#DIV/0!	#DIV/0!	####	####	####	####	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!

*To fill in case of monthly data is not available.

Source: JRC User Manual

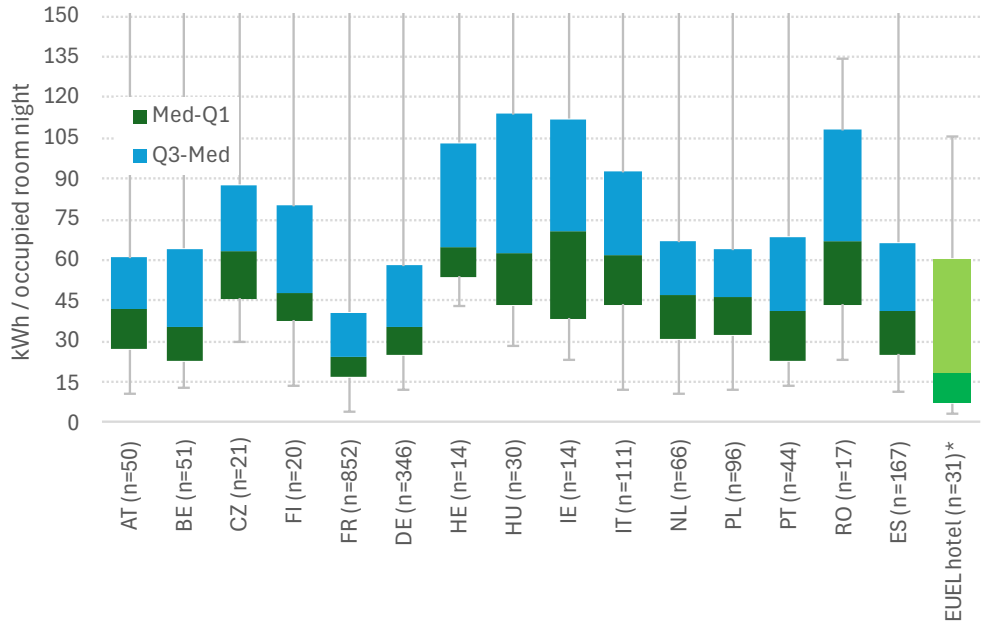
The fact that heating energy is apparently not included in EU Ecolabel data makes it very difficult to obtain a full comparison of specific energy demand. Fuel consumption is an important share of use phase energy consumption in the adjusted PEFCR baseline scenario used in Task 5 of the background report (fuel accounting for around 86 MJ of 101 MJ of total energy consumption in the use phase, ignoring laundry and other additional services).

Broader context from CHSB data: the Cornell Hotel Sustainability Benchmark is a global data collection and benchmarking initiative for the hotel sector. It gathers data on energy intensity, water usage and GHG emissions. Results for energy are available in terms of kWh/occupied room-night (measure 5) and kWh/m2 (measure 6). Each hotel is also defined by the following categories:

- Country (and optionally, region) or climate zone.
- Hotel type (group): Resort or non-resort.
- Hotel type (sub-group for resorts): all-inclusive resort, beach resort, integrated resort, ski resort, all other (resort).
- Hotel type (sub-group for non-resorts): airport, all-suites/extended stay, B&B or inn, convention/conference hotel, all other (hotel).
- Asset class: full service (resort); full service (non-resort); limited service.
- STR segment: economy, midscale, upper midscale, upscale, upper upscale, luxury.
- Location type: urban, suburban, rural/highway, small metro/town.
- Stars: 1, 2, 3, 4, 5.

The most recent data for hotels situated in EU27 countries that report under the CHSB is summarised in the figure below and placed next to the data shared for EU Ecolabel hotels.

Figure 30. Summary of reported specific energy consumptions in hotels in EU27 countries under the CHSB.



Source: CHSB 2024 dataset, available here: https://greenview.sg/resources/chsb-index/

In the figure above, CHSB data has been plotted for each of the EU countries where data was available. All hotels are of the "non-resort" type, but apart from that, no further filtering was conducted on the CHSB data. Some EU countries had relatively low sample numbers (e.g. 14 in Ireland, 17 in Romania) but others had very large datasets (e.g. 167 in Spain, 346 in Germany and 852 in France). Data has been plotted with the middle 50% of data represented by the boxes (green part covering the range from the 1st to the 2nd quartile, and blue part covering the 2nd to 3rd quartile). The whiskers represent the spread to the lowest and highest data points. The highest points are mostly beyond the scale of the y-axis.

Overall, the CHSB data showed a large range of results, from just 4 to 477 kWh/occupied room-night. The ranges for the middle 50% of results were more consistent, varying from 17 to 114 kWh/occupied room-night when considering all countries together. However, this is still a factor of 7 difference. The large ranges of results further emphasise the need for more detailed reporting if any degree of comparability against a fixed benchmark is to be intended.

The EU Ecolabel data is also included at the right-hand side of the figure above. The spread of data suggests that EU Ecolabel hotels are better than the CHSB hotels, but this is not a fair comparison. First of all, because the unit of reporting for EU Ecolabel data was per guest-night, whereas CHSB data is per occupied room-night. The average number of guests per occupied room can only be greater than 1 (a common assumption is 1.2 to 1.6 guests/hotel room) and so this factor would be used as a multiplier to convert guest-night data into room-night data. The second point, which has a bigger potential impact, is that the EU Ecolabel data might be ignoring fuel consumption.

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