

Revision of the EU Ecolabel Criteria for Indoor Cleaning Services product group

Technical Report v.1.0

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1 Abstract

2 This draft Science for Policy Report is intended to provide the background information for the
3 revision of the existing EU Ecolabel criteria for Indoor Cleaning Service ([Commission Decision \(EU\)](#)
4 [2018/680](#) ⁽¹⁾ (EC, 2018)). The EU Ecolabel criteria for Indoor Cleaning services set out in
5 [Commission Decision \(EU\) 2018/680](#) were established in 2018. Commission Decision (EU)
6 2023/693 prolonged their validity until 31 December 2027. The study has been carried out by the
7 Joint Research Centre (JRC) Unit B.5 Circular Economy and Sustainable Industry with the technical
8 support of Viegand Maagøe A/S. The work is being developed for the European Commission´s
9 Directorate-General for Environment.

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

18 This Technical Report addresses the requirements of the [EU Ecolabel Regulation \(EC\) 66/2010](#) ⁽²⁾
19 (EC, 2010) for technical evidence to inform about the criteria revision, and sets the scene for the
20 1st Ad-Hoc Working Group (AHWG) meeting, scheduled for 30th of April 2026, and the following
21 stakeholder consultation. This technical report is supported and complemented by the Preliminary
22 Report, which is published in parallel with this Technical Report.

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

31 This technical report consists of the following key sections: Summary of the Preliminary Report
32 (section 2), scope and definition (section 3), an annex preamble on assessment and verification
33 (section 4) and new criteria proposals (section 5). In this last section the rationale for each of the
34 proposed criterion texts and assessment and verification texts are presented.

¹ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

² EU Ecolabel Regulation. 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](#).

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40

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49 Executive summary

50 Cleaning sector is an important sector of the EU economy, where activities related to general
51 cleaning of buildings achieved a turnover of about €100 billion in 2023 according to Eurostat
52 (Eurostat, 2025). At the same time, it is related to a number of potential environmental impacts due
53 to the use of cleaning products, accessories and machines that require raw materials, water and
54 energy. In this regard, opportunities to reduce the environmental footprint and demonstrate credible
55 sustainability performance should be explored. The EU Ecolabel for Indoor Cleaning Services is a
56 voluntary policy instrument designed to support this transition. However, the current criteria,
57 adopted in 2018 through [Commission Decision \(EU\) 2018/680](#) ⁽³⁾ (EC, 2018), no longer fully reflect
58 market developments, technological progress, evolving environmental priorities, or the diversity of
59 accommodation types now operating in the sector. This first Technical Report (TR1) provides the
60 technical basis for revising the EU Ecolabel criteria for indoor cleaning services and supports the
61 forthcoming stakeholder consultation and policy decision-making process.

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

67 A central objective of this work is to ensure that the revised EU Ecolabel criteria remain ambitious
68 and environmentally robust, while also being proportionate, implementable and relevant for a wide
69 range of cleaning service types. Particular attention is paid to reducing unnecessary administrative
70 burden, improving clarity in assessment and verification, and strengthening the link between criteria
71 requirements and the most significant environmental impact “hotspots” of the sector

72 *Policy context*

73 The EU Ecolabel is the official voluntary labelling scheme of the EU that promotes the production
74 and consumption of products (goods and services) with a reduced environmental impact over their
75 life cycle and is aimed at products with a high level of environmental performance. The [EU](#)
76 [Ecolabel Regulation \(EC\) 66/2010](#) ⁽⁴⁾ (EC, 2010) provides a framework to establish voluntary
77 ecological criteria aiming at reducing the negative impact on the environment, health, climate and
78 natural resources of production and consumption of the defined product group.

79 Established in 1992, it has become a key policy instrument within the European Commission’s
80 Sustainable Consumption and Production and Sustainable Industrial Policy (SCP/SIP) Action Plan
81 (see [COM\(2008\) 397](#) ³ (EC, 2008a)) and the Roadmap for a Resource-Efficient Europe
82 (see [COM\(2011\) 571](#) ⁴ (EC, 2011a)). The Roadmap was designed to move the economy of Europe
83 onto a more resource-efficient path by 2020 in order to become more competitive and to create
84 growth and employment.

³ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

⁴ EU Ecolabel Regulation. 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](#).

85 The EU Ecolabel also has links with other policy instruments, such as Green Public Procurement
86 (GPP, see [COM\(2008\) 400](#) ⁵ (EC, 2008b)), the Eco-Management and Audit Scheme (EMAS)
87 (see [Regulation \(EC\) No 1221/2009](#) ⁶ (EC, 2009b) and [Regulation \(EU\) No 2018/2026](#) ⁷ (EC, 2018c))
88 and the Ecodesign Directive (see [Directive 2009/125/EC](#) ⁸ (EC, 2009a)).

89 The EU Ecolabel was mentioned as having an important role in the [new Circular Economy Action](#)
90 [Plan \(CEAP\)](#) from March 2020 ⁹ (EC, 2020a), being regarded as an important tool whose criteria
91 would be developed in synergy with future eco-design measures.

92 As a part of the circular economy package, the European Commission adopted several legal acts,
93 including the Directive on Empowering Consumers for the Green Transition ([Directive \(EU\)](#)
94 [2024/825](#) ¹⁰ (EC, 2024a)) and the Ecodesign for Sustainable Products Regulation (ESPR) ([Regulation](#)
95 [\(EU\) 2024/1781](#) ¹¹ (EC, 2024c)). The Directive on Empowering Consumers for the Green Transition
96 shares, along with the EU Ecolabel, the goal of promoting sustainability and empowering consumers
97 to make environmentally conscious choices. It is closely linked to the proposed Directive on Green
98 Claims (COM 2023/0085), which promotes reliable claims on the environmental performance of
99 products reducing the risk of greenwashing, and to the now adopted ESPR. These initiatives in line
100 with the principles of the EU Ecolabel, seek to establish a coherent policy framework to help the EU
101 produce sustainable goods, transform consumption patterns in a more sustainable direction, and
102 significantly reduce the environmental footprint of products to contribute to the EU's policy
103 objective of climate neutrality by 2050. Moreover, these initiatives recognise the EU Ecolabel as a
104 reliable third-party certification to prove overall environmental excellence.

105 *Key conclusions*

106 The analysis confirms that clearly defined scope and alignment with NACE codes are essential for
107 ensuring transparency and regulatory compliance across the indoor cleaning services sector,
108 benefiting both large and small enterprises. Public procurement continues to play a pivotal role, with
109 a discernible shift toward “best value” approaches that place greater emphasis on sustainability
110 criteria.

111 A review of current policy options indicates that stricter requirements for ecolabelled products in
112 procurement, targeted support for Small and Medium-sized Enterprises (SMEs), and the introduction
113 of measurable environmental and social performance indicators are warranted. While the existing
114 policy framework remains broadly relevant and is largely validated by market trends, the analysis
115 reveals persistent disparities in ecolabel uptake, particularly among smaller enterprises and in
116 certain regions. This highlights the need for more inclusive and accessible measures to ensure wider
117 participation.

118 The assessment also identifies microplastic pollution from laundering microfibre textiles as an
119 emerging environmental concern not fully addressed by current criteria. This underlines the
120 importance of updating policies to include controls on microplastic emissions and clearer guidance
121 on boundary activities. The shift toward daytime cleaning and the trade-offs between chemical
122 reduction and microplastic release further illustrate the complexity of the sector's environmental
123 challenges, with alternatives such as cellulosic textiles and microfibre retention technologies
124 offering potential solutions.

125 In light of these findings, a reassessment of the costs and benefits associated with product
126 selection, textile use, and automation is recommended. The sector stands to benefit from innovation
127 in digital tools and robotics, though failure to adopt such advancements may perpetuate existing
128 environmental and social challenges.

129 Despite progress in clarifying scope and improving performance metrics, significant knowledge gaps
130 remain—particularly regarding the environmental impact of microfibres, the effectiveness of
131 mitigation measures, and the scalability of new technologies for SMEs. While uncertainties around
132 sector boundaries and performance have been reduced, new questions have emerged, especially
133 concerning microplastics and innovation. Continued research and stakeholder engagement will be
134 crucial to refine policy measures and ensure their ongoing relevance and effectiveness.

135 *Main findings*

136 The analysis confirms that the environmental and social performance of indoor cleaning services is
137 shaped by a combination of sector structure, operational practices, and product choices. Market
138 data and technical assessments show that cleaning product consumption, electricity use for
139 equipment and laundering, and the impacts associated with textile washing are the dominant
140 contributors to the sector’s environmental footprint. LCA studies further demonstrate that adopting
141 sustainable cleaning protocols particularly the use of ecolabelled products and resource-efficient
142 practices can reduce the carbon footprint of indoor cleaning services by 20–31% compared to
143 traditional methods, as well as the consumption of resources and associated costs (for example
144 linked to cleaning products and accessories, water and energy) without compromising hygiene
145 standards.

146 Stakeholder feedback and market analysis highlight significant variability in performance across
147 company sizes and countries, as well as persistent challenges in the uptake of ecolabels among
148 smaller enterprises. The shift in public procurement from lowest-price to “best value” approaches
149 that consider not only costs but put a growing emphasis on sustainability and service quality, is also
150 driving change in the sector that could contribute to an increased uptake of EU Ecolabel across the
151 EU. This can be observed in countries that have implemented or are planning to implement
152 mandatory requirements of holding ecolabel licences for cleaning services providers to be eligible in
153 tenders.

154 A review of the existing criteria indicates that while many requirements remain relevant, targeted
155 revisions are needed to address emerging issues. Key challenges include the environmental impact
156 of microplastic pollution from laundering microfibre textiles, the need for more inclusive measures
157 to support SME participation, and the balance between chemical reduction and alternative risks. At
158 the same time, the analysis identifies opportunities to strengthen criteria related to sustainable
159 product selection, efficient resource use, circular economy strategies, and improved labour
160 standards, drawing on best practices from other ecolabel schemes and recent technological
161 advances such as automation and digitalisation.

162 On this basis, the proposed revisions to the EU Ecolabel criteria for indoor cleaning services focus on
163 clarifying scope and definitions, enhancing environmental and social effectiveness, and ensuring
164 usability for both applicants and competent bodies. The new framework aims to be coherent with
165 other EU sustainability policies and responsive to ongoing innovation and stakeholder input, as well
166 as to potential for simplification. These proposals are intended as a foundation for further
167 discussion and will be refined through continued consultation and technical development.

168 *Related and future Joint Research Centre work*

169 This Technical Report (TR1) effectively constitutes supporting technical research and context for the
170 proposal of revised EU Ecolabel criteria for indoor cleaning services, which will be presented in a
171 series of draft JRC Technical Reports over the next 12-18 months, culminating in a final version of
172 revised criteria to be adopted.

173 1. Introduction

174 The EU Ecolabel is the official voluntary labelling scheme of the European Union (EU) that
175 promotes the production and consumption of products (goods and services) with a
176 reduced environmental impact over their life cycle and is aimed at product, helping to define
177 and signal products with a high level of environmental performance. The [EU Ecolabel Regulation](#)
178 [\(EC\) 66/2010](#) ⁽⁵⁾ (EC, 2010) provides a framework to establish voluntary ecological criteria aiming
179 at reducing the negative impact on the environment, health, climate and natural resources of
180 production and consumption of the defined product group.

181 The objective of this project ⁽⁶⁾ is to revise the existing EU Ecolabel criteria for indoor cleaning
182 services ([Commission Decision \(EU\) 2018/680](#) ⁽⁷⁾ (EC, 2018)) according to the revision process laid
183 down in the Ecolabel Regulation. The current EU Ecolabel criteria for indoor cleaning services
184 product group were adopted in 2018. Since their adoption, the Decision was amended twice, by
185 [Commission Decision \(EU\) 2023/693](#) ⁽⁸⁾ (EC, 2023a) extending the validity of the criteria until 31
186 December 2027 and [Commission Decision \(EU\) 2023/705](#) ⁽⁹⁾ (EC, 2023b), as regards the energy
187 efficiency requirements for EU Ecolabel tourist accommodation and EU Ecolabel indoor cleaning
188 services for certain energy-related products.

189 This 1st Technical Report (TR1) addresses the requirements of the [EU Ecolabel Regulation \(EC\)](#)
190 [66/2010](#) ⁽¹⁰⁾ (EC, 2010) and its main purpose is to summarise the results of the preliminary
191 analysis of the current criteria and to consider if the criteria are still appropriate and up-to-date or
192 if they should be restructured and/or any of them should be revised, amended, removed or added.
193 TR1 provides elements supporting the revised EU Ecolabel criteria for indoor cleaning services. The
194 study has been carried out by the Joint Research Centre (JRC), Unit B.5 – Circular Economy and
195 Sustainable Industry with the technical support of Viegand Maagøe. The work has been developed
196 for the European Commission’s Directorate-General for the Environment. All relevant documents of
197 the study can be found in the dedicated website ⁽¹¹⁾.

⁵ EU Ecolabel Regulation. 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](#).

⁶ See Documentation relating to the revision of EU Ecolabel criteria for Indoor cleaning services on the JRC website in [this link](#). (Accessed 30/06/2025).

⁷ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

⁸ Commission Decision (EU) 2023/693 of 27 March 2023 amending Decisions (EU) 2017/1214, (EU) 2017/1215, (EU) 2017/1216, (EU) 2017/1217, (EU) 2017/1218, (EU) 2017/1219 and (EU) 2018/680 as regards the period of validity of the EU Ecolabel criteria and of the related assessment and verification requirements (OJ L 91, 29.3.2023, pp. 11–14). Available at [this link](#).

⁹ Commission Decision (EU) 2023/705 of 29 March 2023 amending Decisions (EU) 2017/175 and (EU) 2018/680 as regards the energy efficiency requirements for EU Ecolabel tourist accommodation and EU Ecolabel indoor cleaning services for certain energy-related products (OJ L 92, , p. 19–26). Available at [this link](#).

¹⁰ EU Ecolabel Regulation. 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](#).

¹¹ JRC Product Bureau Website: <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/409/home>. (Accessed 5 December 2025).

198 The revision process takes the legal criteria text of [Commission Decision \(EU\) 2018/680](#) ⁽¹²⁾ (EC,
199 2018) as the starting point and seeks to analyse its validity, taking into account technological and
200 economic changes in the European market, relevant legislative changes, improved scientific
201 knowledge and feedback from Competent Bodies and license holders. An important part of the
202 process for developing or revising EU Ecolabel criteria is the involvement of stakeholders through
203 their consultation on draft criteria proposals and technical reports. This is carried out via Ad-Hoc
204 Working Group (AHWG) meetings, conference calls, email exchanges, forum discussions and written
205 comments submitted via the online platform EU survey. The criteria revision process involves
206 contributions from technical experts, non-governmental organisations (NGOs), Member State
207 representatives and industry stakeholders, among others.

208 This TR1 is supported and complemented by the draft Preliminary Report published in parallel in
209 March 2026, ahead of the 1st Ad-Hoc Working Group (1st AHWG) meeting scheduled for April 2026.
210 The Preliminary Report includes analyses of the scope and definition, market analysis, and technical
211 analysis, with a particular focus on specific consumption metrics and life cycle impacts. In the
212 Preliminary Report, the results of a life cycle assessment (LCA) for different archetypes of cleaning
213 activities were presented for the identification of environmental hotspots.

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

221 — This TR1 is structured as follows: Introduction (Chapter 1): this section describes the goal of
222 the project and the structure of the document.

223 — Summary of the Preliminary Report (Chapter 2): this section summarises the main findings
224 from the Preliminary Report, especially with respect to the scope and definition analysis, the
225 market analysis and the technical analysis, including an overview of the results of the LCA
226 screening studies.

227 — Scope, definitions and criteria structure (Chapter 3): this section reports changes to the
228 scope, definitions and criteria structure related to the product group ‘indoor cleaning services’.

229 — Annex preamble (Chapter 4): this section includes general information on the type of proof
230 171 required to show compliance with the criteria that shall be provided by applicants and ap-
231 172 proved by Competent Bodies.

232 Criteria proposals and rationales (Chapter 5): this section reports changes to the criteria related
233 to the product group ‘indoor cleaning services’. Each proposed criterion is introduced with a
234 summary of changes, followed by findings from the stakeholder survey, comparisons with similar

¹² Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

235 ecolabel criteria, further analysis of relevant aspects, and questions for stakeholders providing a
236 clear structure for understanding the rationale behind each update.

237 The existing criteria and the new proposed criteria are presented next to each other in a single table
238 with four rows, as follows:

Existing criterion from Commission Decision (EU) 2018/680: X
This is the text published in Commission Decision (EU) 2018/680 currently in force. The text is provided in this document in grey italic font, for example: <i>"The applicant shall provide X and Y."</i>
Proposed new criterion for TR1: X Y
Any changes in the criterion proposal would be flagged by blue text and strikethrough, for example: "The applicant shall provide X and Y Z. Y shall only be required in case of..."

239 The following scenarios may occur:

240 — No changes between the existing requirements and the TR1 proposal – simply state this as such
241 instead of copying the same text twice.

242 — Minor or medium changes in the TR1 proposal – highlight all changes using strikethrough and
243 blue font.

244 — Major or complete changes in the TR1 proposal – simply write the entire proposal in blue text to
245 avoid large chunks of strikethrough text, which will affect readability and the length of the TR1
246 document.

247 — Criterion is proposed to be removed in TR1 - simply state this in the proposal field.

248 — A completely new criterion is introduced in TR1 – simply state in the existing criterion field that
249 there was no previous equivalent criterion.

250

251 2. Summary of the Preliminary Report

252 This summary is based on the content of version 1.0 of the draft Preliminary Report (PR). Any
253 substantive modifications to the PR introduced in subsequent versions shall be duly reflected in this
254 summary section of future editions of the Technical Report, where relevant

255 2.1. Task 1: Scope and Definition

256 During July-August 2025, the JRC conducted a comprehensive analysis and stakeholder
257 consultation to inform the revision of the EU Ecolabel criteria for Indoor Cleaning Services (ICS), as
258 established under [Commission Decision \(EU\) 2018/680](#) ⁽¹³⁾ (EC, 2018). A total of 57 responses were
259 received to a preliminary questionnaire, with 51% of them being from cleaning service providers
260 (mainly large enterprises), and the remainder from competent bodies, industry associations, and
261 other stakeholders.

- 262 • Motivation for the EU Ecolabel: The main drivers for seeking the EU Ecolabel
263 certification in the cleaning sector were: alignment with sustainability goals, regulatory
264 compliance, market differentiation and demand from clients (for example, in public
265 procurement). Stakeholders highlighted the importance of health, pollution prevention, and
266 circular economy objectives, as well as the credibility and recognition of the EU Ecolabel.
- 267 • Experience with EU Ecolabel: Stakeholder feedback was mixed regarding the current
268 scope and definitions. While many found the existing scope broadly appropriate, others
269 called for clearer boundaries and improved definitions, especially regarding the frequency
270 of “routine” cleaning, the terminology for cleaning products, and the inclusion of new
271 definitions (e.g., sanitisation, disinfection, floor care). Administrative requirements such as
272 separate accounting for EU Ecolabel-compliant services were seen as a significant burden,
273 particularly for Small and Medium-Sized Enterprises (SMEs).
- 274 • Competent Body insights: Respondents noted that aligning the scope with NACE Rev 2.1.
275 code 81.21 (general cleaning of buildings) ⁽¹⁴⁾ (European Commission. Statistical Office of
276 the European Union., 2025) would clarify inclusions and exclusions, facilitate accounting,
277 and improve consistency with market statistics. There was consensus that activities such as
278 pest control, industrial cleaning, and gardening should remain excluded, while limited
279 inclusion of certain disinfection practices could be considered with caution.
- 280 • Areas for improvement: Key recommendations included: clarifying the scope and
281 definitions (especially around “routine” cleaning and product terminology), reducing
282 administrative burdens (for example, by reducing the criteria to the minimum strictly
283 necessary, simplifying templates for reporting and alleviating some criteria for SMEs,
284 among others), and ensuring the criteria remain relevant in light of evolving EU policy and

¹³ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

¹⁴ NACE Rev. 2.1. – Statistical classification of economic activities in the European Union – 2025 edition. Available at [this link](#).

- 285 legislation. Stakeholders also suggested introducing more comprehensive definitions and
286 aligning exclusions with NACE codes for legal clarity.
- 287 • Scope and definitions: The analysis proposed aligning the product group explicitly with
288 NACE Rev. 2.1 code 81.21, covering general (non-specialised) routine cleaning of all building
289 types, and clearly excluding specialised, industrial, and outdoor cleaning activities, as well as
290 pest control and landscape services. New and revised definitions were proposed to improve
291 clarity and support consistent application.
 - 292 • Criteria themes and revisions: The review highlighted the need to update criteria in line
293 with recent and forthcoming EU legislation (e.g., on chemicals, waste, plastics, and
294 sustainability reporting). The document also compared the EU Ecolabel with other ISO Type I
295 ecolabels (e.g., Nordic Swan, Green Seal), noting common themes such as the combination
296 of mandatory and optional requirements, and the grouping of criteria by environmental
297 impact areas.
 - 298 • Specific criteria challenges: Administrative requirements for separate accounting and
299 organisational separation were identified as major barriers to uptake, especially for SMEs.
300 The need for clearer guidance on boundaries (e.g., between routine and specialised cleaning,
301 or between sanitisation and disinfection) was emphasised.

302 2.1.1. Top-down review of legal and policy context relating to the scope

303 The report reviews the ICS scope in the context of a wide range of EU and international policies and
304 regulations, including the following:

- 305 • High-level: the UN Sustainable Development Goals (SDGs) ⁽¹⁵⁾, the [European Green Deal](#)
306 ⁽¹⁶⁾ (EC, 2019b), the EU [Competitiveness Compass](#) for the EU ⁽¹⁷⁾ (EC, 2025a), the [Clean](#)
307 [Industrial Deal](#) ⁽¹⁸⁾ (EC, 2025b), and the Fit-for-55 package ⁽¹⁹⁾.

¹⁵ Sustainable Development Goals. United Nations. Department of Economic and Social Affairs. Sustainable Development. Available at [this link](#).

¹⁶ The European Green Deal. Communication from the Commission to the European parliament, the Council, the European economic and social committee and the Committee of the regions: The European Green Deal, COM(2019) 640 final. Available at [this link](#).

¹⁷ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions. A Competitiveness Compass for the EU. COM(2025) 30 final. Available at [this link](#)

¹⁸ The Clean Industrial Deal. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonisation. COM(2025) 85 final. Available at [this link](#)

¹⁹ See: https://commission.europa.eu/topics/climate-action/delivering-european-green-deal/fit-55-delivering-proposals_en

- 308 • Mid-level: the [Corporate Sustainability Reporting Directive \(CSRD\)](#) ⁽²⁰⁾ (EC, 2022), the
309 [Circular Economy Action Plan](#) ⁽²¹⁾ (EC, 2020a), the [Zero Pollution Action Plan](#) ⁽²²⁾ (EC, 2021),
310 the [Single Use Plastics Directive \(EU\) 2019/904](#) ⁽²³⁾ (EC, 2019a), the [Packaging and](#)
311 [Packaging Waste Regulation \(PPWR\)](#) ⁽²⁴⁾ (EC, 2025b) and the EU Biodiversity strategy for
312 2030 ⁽²⁵⁾ (EC, 2020), among others. .
- 313 • Sector-specific: the [EU Ecolabel Regulation](#) ⁽²⁶⁾ (EC, 2010), the [Energy Labelling Regulation](#)
314 ⁽²⁷⁾ (EC, 2017), the [Ecodesign for Sustainable Products Regulation](#) ⁽²⁸⁾ (EC, 2024a), the
315 [REACH Regulation](#) ⁽²⁹⁾ (EC, 2006), the [CLP Regulation](#) ⁽³⁰⁾ (EC, 2008a), the the [Occupational](#)
316 [Safety and Health \(OSH\) Directive](#) ⁽³¹⁾ (EEC, 1989), the [Waste Framework Directive](#)

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- ²⁰ The Corporate Sustainability Reporting Directive. Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting (OJ L 322, 16.12.2022, p. 15-80). Available at [this link](#).
- ²¹ 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](#).
- ²² Zero Pollution Action Plan. EU Action Plan: 'Towards Zero Pollution for Air, Water and Soil'. Communication from the Commission to the European Parliament, the council, the European economic and social committee and the committee of the regions. Available at [this link](#).
- ²³ Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment (OJ L 155, 12.6.2019, pp. 1–19). Available at [this link](#).
- ²⁴ The Packaging and Packaging Waste Regulation. Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (OJ L, 2025/40, 22.1.2025). Available at [this link](#).
- ²⁵ EU Biodiversity strategy for 2030. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions EU Biodiversity Strategy for 2030 Bringing nature back into our lives COM/2020/380 final. Available at [this link](#).
- ²⁶ EU Ecolabel Regulation. 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](#).
- ²⁷ Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU (OJ L 198, 28.7.2017, pp. 1–23). Available at [this link](#).
- ²⁸ ESPR Regulation. 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, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC (OJ L 2024/1781, 28.6.2024). Available at [this link](#).
- ²⁹ REACH Regulation. Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (OJ L 396, 30.12.2006, p. 1-849). Available at [this link](#).
- ³⁰ CLP Regulation. Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1-1355). Available at [this link](#).
- ³¹ Council Directive of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work (89/391/EEC) (OJ L 183, 29.6.1989, pp. 1–8). Available at [this link](#).

317 [\(2008/98/EC\)](#) ⁽³²⁾ (EC, 2008b) and the [public procurement directives](#) ^(33, 34, 35) (EC, 2014a,
318 2014b, 2014c).

319 • Other relevant frameworks: The analysis also considers the impact of forthcoming
320 legislation (e.g., [Circular Economy Act](#) ⁽³⁶⁾ (EPRS, 2026), [European Water Resilience Strategy](#)
321 ⁽³⁷⁾ (EC, 2025c)) and the alignment with market and statistical categories (notably NACE
322 Rev. 2.1 codes).

323 This broad policy context underscores the multi-faceted nature of indoor cleaning services and the
324 need for criteria that are both comprehensive and adaptable to regulatory developments.

325 2.1.2. Bottom-up review of criteria and other ecolabels relating to the scope

326 The bottom-up review in the report systematically examines the legislative references, definitions,
327 and boundaries of the current EU Ecolabel criteria for indoor cleaning services (ICS), as well as
328 comparisons with other relevant ecolabels and schemes.

329 Review of legislative references and standards: A screening of the legislative references in
330 [Commission Decision \(EU\) 2018/680](#) ⁽³⁸⁾ (EC, 2018) reveals that several cited regulations and
331 standards have been amended or repealed since their inclusion, highlighting the need for regular
332 updates to maintain legal and technical relevance. Key references include the [EU Ecolabel](#)
333 [Regulation \(EC\) 66/2010](#) ⁽³⁹⁾ (EC, 2010) (the legal framework for the EU Ecolabel), Regulation (EC)
334 No 765/2008 (accreditation), Regulation (EC) No 1221/2009 (EMAS), and Regulation (EC) No
335 1272/2008 (CLP), among others. The review also covers standards such as ISO 14024 (Type I
336 ecolabels), ISO 14001 (environmental management systems), and EN 13549 (cleaning industry
337 quality measurement), noting their influence on the criteria and the need for alignment with current
338 best practices.

339 Comparison with other ecolabels: The analysis compares the EU Ecolabel for ICS with other ISO
340 14024 Type I ecolabels, including the Nordic Swan ([Nordic Swan Ecolabel for cleaning services](#) ⁽⁴⁰⁾)

³² Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (OJ L 312, 22.11.2008, pp. 3–30). Available at [this link](#).

³³ Directive 2014/23/EU of the European Parliament and of the Council of 26 February 2014 on the award of concession contracts (OJ L 94, 28.3.2014, pp. 1–64). Available at [this link](#).

³⁴ Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC (OJ L 94, 28.3.2014, pp. 65–242). Available at [this link](#).

³⁵ Directive 2014/25/EU of the European Parliament and of the Council of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC (OJ L 94, 28.3.2014, p. 243–374). Available at [this link](#).

³⁶ Circular economy act. Commission initiative in preparation. This European Parliamentary Research Service paper aims to inform Members on issues related to a forthcoming Commission initiative. Available at [this link](#)

³⁷ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: European Water Resilience Strategy, COM/2025/280 final', Available at [this link](#).

³⁸ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

³⁹ EU Ecolabel Regulation. 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](#).

⁴⁰ Nordic Ecolabelling for Cleaning services 076 - V4.2. Nov 2025. Available at [this link](#) (Accessed 31/03/26).

341 (Nordic Swan Ecolabel, 2025)), Green Seal ([GS-42](#) ⁽⁴¹⁾ (Green Seal, 2024) and [GS-49](#) ⁽⁴²⁾ (Green
342 Seal, 2021)), [Eco Mark](#) (Japan) ⁽⁴³⁾ (Eco Mark, 2021), and Eco Choice Aotearoa standard for cleaning
343 services [EC-45-18](#) (New Zealand) ⁽⁴⁴⁾ (Eco Choice Aotearoa, 2023). These schemes share a common
344 approach of combining mandatory and optional requirements and grouping criteria into themes
345 such as management, energy, water, waste, chemicals, and social aspects. However, there are
346 notable differences in scope and definitions:

- 347 • The Nordic Swan covers ordinary cleaning and window surface cleaning, but excludes
348 special cleaning services from its scope.
- 349 • Green Seal distinguishes between commercial/institutional and residential cleaning, with
350 further exclusions for specialised services like deep carpet cleaning or mold remediation.
- 351 • Eco Mark and Eco Choice Aotearoa focus on general building cleaning, with explicit
352 exclusions for house cleaning and disinfection.

353 These comparisons inform the EU Ecolabel revision by highlighting the importance of clear
354 boundaries between routine and specialised cleaning, and the need for precise definitions to support
355 consistent application and enforcement.

356 Definitions and boundaries: The review identifies a need for improved and expanded definitions
357 within the EU Ecolabel criteria. Existing definitions, such as “routine professional cleaning services,”
358 are retained, but new definitions are proposed to be added for terms like “sanitisation activity,”
359 “disinfection activity,” “pest control activity,” and “ready to use cleaning products.” These additions
360 aim to clarify the boundaries of the product group, particularly regarding the inclusion of
361 sanitisation in hygiene-critical areas and the exclusion of disinfection and pest control. The
362 alignment with NACE Rev. 2.1 code 81.21 (general cleaning of buildings) is proposed to provide
363 legal precision and facilitate separate accounting for EU Ecolabel-compliant services.

364 Inclusion and exclusion of activities: Stakeholder feedback was divided on whether to expand
365 the scope of the EU Ecolabel for ICS. Suggestions for inclusion, such as outdoor cleaning, industrial
366 site cleaning, pest control, disinfection, mechanised window cleaning, and gardening, were
367 evaluated for their technical, regulatory, and operational feasibility. Most proposed extensions were
368 found to present significant challenges, especially for SMEs, and risked diverging from the core
369 concept of routine indoor cleaning. The activities with the highest potential for inclusion were found
370 to be the outdoor cleaning of areas inherently linked to buildings and the indoor cleaning of
371 buildings at industrial production sites (excluding process areas). The analysis concluded that the
372 current scope is mostly appropriate but would benefit from clearer boundaries and improved
373 definitions, with any extension of scope to be approached cautiously.

⁴¹ Green Seal Standard for Commercial and Institutional Cleaning Services (GS-42), Edition 2.3, 2015. Available at [this link](#) (Accessed 31/03/2026).

⁴² Green Seal Standard for Residential Cleaning Services (GS-49), Edition 1.1, 2013. Available at [this link](#) (Accessed 31/03/2026).

⁴³ Eco Mark Product Category No. 510. Cleaning Services, Version 1.1, Certification criteria, 2021. Available at [this link](#) (Accessed 31/03/2026).

⁴⁴ The New Zealand Ecolabelling Trust – Licence Criteria for Cleaning Services, EC-45-18, Version June 2023. Available at [this link](#) (Accessed 27/03/26).

374 Administrative challenges: The review also highlights administrative requirements, such as the
375 need for separate accounting and organisational separation for EU Ecolabel-compliant services.
376 These requirements are seen as burdensome, particularly for SMEs, and may hinder market uptake
377 unless there is strong client demand. The report recommends streamlining these requirements and
378 providing clearer guidance to facilitate compliance.

379 2.2. Task 2: Market Analysis

380 Scope and Definitions The analysis covers routine, professional indoor cleaning services for all
381 building types, as defined by NACE Rev. 2.1 code 81.21 ⁽⁴⁵⁾ (European Commission. Statistical Office
382 of the European Union., 2025). This includes cleaning of interior floors, walls, ceilings, fixtures, and
383 related exterior elements like windowpanes and door frames. Excluded are disinfection, pest control,
384 outdoor cleaning, industrial cleaning, landscape services, and cleaning as part of residential care or
385 personal services.

386 Value Chain and Key Actors The value chain remains stable, linking building users, service
387 providers, and suppliers. Cleaning is delivered by a mix of in-house teams and outsourced
388 contractors, with increasing integration into facility management contracts. Inputs flow from
389 manufacturers of chemicals used as detergents and cleaning products, textiles, and equipment
390 through distributors to service providers, supported by laundry, maintenance, and logistics services.
391 The sector is characterised by a large number of small firms and a few large companies with
392 significant market share.

393 Market Size and Structure

394 • According to Eurostat data, the net turnover for NACE 81.2 “cleaning activities” in the EU27
395 was €137.5 billion in 2023 and €146.7 billion in 2024. In the case of NACE 81.21 “general
396 cleaning of buildings”, in particular, the turnover in the EU27 was €101 billion in 2023,
397 which corresponds to 73.4% of the total turnover for the broader NACE 81.2 category
398 (Eurostat, 2025)

399 • The sector is highly fragmented: 91.5% of firms have fewer than 10 employees, but just
400 0.4% of companies (those with 250+ employees) generate nearly half of total turnover.

401 • In 2023, there were 295,934 enterprises under NACE Rev. 2.1 code 81.21, accounting for
402 75.9% of all cleaning activities (NACE Rev. 2.1 code 81.2).

403 • The four largest markets—Germany, France, Italy, and Spain—account for around 68% of
404 total European turnover.

405 Trends in Supply and Demand

406 • Employment and enterprise numbers have grown steadily since 2018, with a notable
407 rebound after the COVID-19 dip and a 5% employment increase in 2023 ,and continued
408 growth in both employment and the number of enterprises into 2024.

⁴⁵ NACE Rev. 2.1. – Statistical classification of economic activities in the European Union – 2025 edition. Available at [this link](#).

- 409 • Turnover for NACE Rev. 2.1 code 81.21 reached €101 billion in 2023, representing 73.4% of
410 the broader cleaning sector and reflecting growth since 2018.
- 411 • A risk of undeclared work within the cleaning sector exists, with estimates that about 16%
412 cleaning and ironing services purchased in the EU are undeclared services, but it is more
413 likely associated to activities corresponding to NACE codes not covered by the proposed
414 scope than to activities within NACE group 81.2.
- 415 • The market is robust, with new entrants and heightened competition, especially in Western
416 and Nordic countries.

417 Public Procurement and Sustainability

418 Public procurement is a major demand driver, accounting for up to 50% of turnover for some
419 companies, and there is a gradual shift from lowest-price tendering to “best value” approaches that
420 emphasise quality and sustainability. However, price-driven competition remains prevalent,
421 particularly in public contracts. The geographic distribution of EU Ecolabel licenses for indoor
422 cleaning services as of September 2025 is highly uneven, with Italy holding 217 licenses (over 80%
423 of the total), followed by Spain with 29 licenses (11%) and France with 8 licenses (3%). This
424 concentration in Southern Europe, especially in Italy, is largely attributed to public tenders requiring
425 Minimum Environmental Criteria (CAM) and strong links to Green Public Procurement, which provide
426 significant incentives for certification. Other EU countries, such as Denmark or Germany, are
427 progressively adopting similar approaches by including requirements or award criteria related to the
428 ownership, by cleaning service providers of ecolabel licences. These trends highlight both the
429 influence of procurement policies on ecolabel uptake and the growth potential in underrepresented
430 markets.

431 Innovation and Sustainability Trends

- 432 • The sector is adopting digital management tools, automation, and resource-efficient
433 methods, especially among larger providers.
- 434 • Sustainability is increasingly important, with measurable performance and credible
435 documentation becoming key differentiators.
- 436 • Ecolabels and environmental management standards (e.g., EU Ecolabel, Nordic Swan, ISO
437 14001) are gaining traction, though uptake varies by country and company size.

438 EU Ecolabel Uptake and Consumer Preferences

- 439 • EU Ecolabel licenses for indoor cleaning have grown rapidly since 2019, reaching 268
440 licenses by September 2025.
- 441 • Adoption is concentrated among large companies and in Southern Europe (notably Italy and
442 Spain), while uptake remains limited in major markets like Germany and France , partly due
443 to the absence of a national ecolabel for indoor cleaning services.
- 444 • Consumer surveys indicate high trust in independent ecolabels and growing expectations for
445 sustainability, transparency, and measurable impact.

446 SWOT Analysis

- 447 • Strengths: Large, resilient market; steady growth; essential service status; increasing
448 professionalisation and technology adoption.

- 449 • Weaknesses: Highly fragmented structure; labour shortages; price-led competition; uneven
450 ecolabel uptake.
- 451 • Opportunities: Shift to value-based procurement; growth in outsourcing; demand for
452 sustainability and digital solutions; market consolidation.
- 453 • Threats: Margin pressures; lowest-price procurement; workforce aging; regulatory
454 demands; risk of small firm exclusion.

455 2.3. Task 3.1: Technical analysis of operations, services and technologies 456 relevant for the ICS scope

457 Task 3.1 focused on routine cleaning tasks, products, accessories, equipment, and operational
458 methods, structured around four main service types: floor cleaning, sanitary cleaning, window and
459 glass cleaning, and general surface cleaning. The analysis aligned with the scope defined by NACE
460 Rev. 2.1 code 81.21 ⁽⁴⁶⁾ (European Commission. Statistical Office of the European Union., 2025) and
461 [Commission Decision \(EU\) 2018/680](#) ⁽⁴⁷⁾ (EC, 2018).

462 Sector Trends and Technology: The indoor cleaning sector has undergone significant
463 transformation in recent years, driven by technological innovation, regulatory changes, and evolving
464 market expectations. Mechanisation and automation such as scrubber-driers, robotic vacuums, and
465 IoT-enabled systems are increasingly standard, especially in commercial and institutional settings.
466 These technologies enable more efficient, consistent cleaning, optimised chemical and water use,
467 and improved worker safety. Digitalisation supports real-time monitoring and risk-based cleaning
468 approaches.

469 Cleaning Products and Environmental Impact: There is a clear shift away from traditional,
470 chemical-intensive cleaning towards environmentally conscious practices. Biodegradable, plant-
471 based, and probiotic formulations are gaining ground, while hazardous substances (e.g., borates,
472 phosphates, VOCs, microplastics, PFAS) are increasingly restricted or banned under both Nordic
473 Swan and EU Ecolabel detergent criteria. Resource efficiency is promoted through concentrates,
474 dosing systems, and refill models, reducing chemical use, packaging waste, and transport volumes.

475 Supplies and Accessories: Routine cleaning relies on a mix of reusable and single-use
476 accessories. Microfibre cloths and mops are preferred for their cleaning efficacy and reduced
477 chemical use, though their environmental impact is partly shifted to laundering and potential
478 microfibre shedding. Other common accessories include paper towels, trash liners, gloves, dosing
479 equipment, spray bottles, buckets, cleaning carts, and safety equipment. The sector is placing
480 greater emphasis on ergonomics, worker safety, and structured training.

481 Workforce and Operational Patterns: Cleaning services are predominantly delivered by part-
482 time workers, with average working hours varying across Europe. The sector traditionally operates
483 outside normal occupancy hours, but there is a growing movement towards daytime cleaning,

⁴⁶ NACE Rev. 2.1. – Statistical classification of economic activities in the European Union – 2025 edition. Available at [this link](#).

⁴⁷ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

484 driven by health, job satisfaction, and policy initiatives. National practices differ, with Nordic
485 countries leading in daytime cleaning adoption. It should also be noted that a significant proportion
486 of indoor cleaning services are provided within the informal sector (or as undeclared work), which
487 likely accounts for the majority of services in some regions. This prevalence of unregistered services
488 presents a substantial obstacle to the uptake of the EU Ecolabel

489

490 Service-Specific Technical Analysis

491 • Floor Cleaning: Routine floor cleaning is managed as a controlled process, distinct
492 from restorative treatments (polishing, waxing, etc.). Manual mopping, non-autonomous
493 machines, and autonomous robots are used, with strict controls on chemical
494 consumption and a high share of ecolabelled products. Automation enables consistent
495 dosing and quality, but shifts environmental hotspots to electricity and consumables.

496 • Sanitary Cleaning: Hand cleaning dominates due to complex geometries and hygiene-
497 critical touchpoints. Best practice emphasises process control, area-dedicated tools, and
498 moisture removal. Routine detergents and descalers are baseline; disinfection is
499 selective and treated as “special cleaning” outside the ecolabelled scope. Packaging and
500 waste are tied to daily routines and the use of concentrates and dosing systems.

501 • Window and Glass Cleaning: Indoor glass cleaning is typically manual, using cloths,
502 squeegees, and RTU sprays. Water-fed pole methods are increasingly used for safety at
503 height. Environmental impact reduction focuses on limiting RTU spray use and
504 maximising reusable textiles. Treated water systems offer chemical-free cleaning but
505 may increase water consumption. EU Ecolabel criteria set limits on aquatic toxicity and
506 VOCs for window cleaners.

507 • Surface Cleaning: Manual wiping with microfibre or reusable cloths is standard,
508 reducing paper waste and chemical use. However, impacts shift to laundering and
509 microfibre pollution. Chemical management is tightened, with ordinary cleaning
510 separated from disinfection (the latter treated as “special cleaning”). Nordic Swan
511 criteria cap chemical consumption and require a high share of ecolabelled products.

512 • Packaging and Waste Management Best practices emphasise the use of
513 concentrates, refill systems, and dilution control to minimise packaging waste.
514 Regulatory and procurement pressure on single-use formats (e.g., wet wipes) is
515 increasing, with explicit accounting for substrate, packaging, and end-of-life impacts.
516 The EU Single-Use Plastics Directive and microplastics restrictions are shaping
517 procurement and operational practices.

518 2.4. Task 3.2: Literature review

519 This task evaluated the environmental and social impacts of indoor cleaning services (ICS) through
520 the lens of LCA methodologies. ICS in this context refers to routine cleaning activities in non-
521 healthcare environments such as offices, schools, and public buildings.

522 A comprehensive search of scientific literature and agency reports identified thirty relevant studies
523 addressing the LCA of cleaning services, products, and technologies. However, none provided a
524 complete LCA model or detailed Life Cycle Inventory (LCI) data specifically for ICS. The most

525 pertinent studies are recent comparative LCAs by Fontana et al., which contrast traditional and
526 sustainable cleaning protocols in both civil and healthcare settings.

527 Key Findings from the Literature

- 528 • Sustainable Cleaning Protocols: Studies consistently show that sustainable cleaning
529 protocols—such as the use of eco-labeled detergents and reusable textiles—
530 significantly reduce environmental impacts, particularly CO₂ emissions, without
531 compromising hygiene standards. For example, switching to eco-labeled detergents in
532 laundry systems can reduce CO₂ emissions by up to 77% compared to conventional
533 products.
- 534 • Environmental Product Declarations (EPDs): Two EPDs for professional cleaning
535 services report similar environmental impacts per square meter cleaned per year,
536 covering indicators such as global warming potential, acidification, eutrophication, and
537 resource use.
- 538 • Detergents and Textiles: LCAs of detergents highlight that ingredient selection and
539 packaging are major drivers of climate and resource impacts. Comparative studies of
540 reusable versus single-use textiles (cloths and mops) consistently find that reusable
541 options have much lower environmental impacts across all categories.
- 542 • Equipment: LCA studies on vacuum cleaners identify electricity consumption during use
543 as the primary environmental hotspot. Product durability is beneficial for both
544 environmental and economic reasons, though older equipment may be less energy
545 efficient.

546 Ecolabel schemes such as Nordic Swan and Green Seal incorporate life-cycle perspectives analyses
547 into their criteria, with the Nordic Swan including MECO (Materials, Energy, Chemicals, Others)
548 analysis. Nordic Swan, for example, uses “1 m² cleaned per year” as its functional unit and bases
549 requirements on LCA data for key components. However, these ecolabels do not publish
550 comprehensive, transparent service-level LCAs.

551 The literature lacks LCI data suitable for direct use in new LCA models for ICS. As a result, the
552 study’s own LCI was constructed from independent data sources, including agency reports, EPDs,
553 product datasheets, and stakeholder interviews. The Product Category Rules (PCR) for professional
554 cleaning services and the EU Product Environmental Footprint (PEF) method were used to define
555 system boundaries, functional units, and impact categories.

556 2.5. Task 3.3: LCA analysis

557 This task involved a screening LCA study conducted by the JRC in the framework of the ongoing
558 revision. The study included the data collection process, the description of LCA methodology used to
559 evaluate the environmental impacts of ICS, the modelling of different archetypes and scenarios for
560 different cleaning activities (i.e. floor, sanitary, windows and surfaces cleaning) and the reporting
561 and interpretation of the obtained screening results.

562 The study gathered data from a range of sources, including service providers, product
563 manufacturers, Environmental Product Declarations (EPDs), agency reports, and stakeholder
564 interviews. Data covered cleaning products, textiles, equipment, energy and water use, waste
565 generation, and operational practices. The collection focused on routine cleaning tasks in offices,

566 schools, and public buildings, aligning with the scope defined by NACE Rev. 2.1 code 81.21 ⁽⁴⁸⁾
567 (European Commission. Statistical Office of the European Union., 2025).

568 The LCA was conducted according to the EU Product Environmental Footprint (PEF) method and
569 relevant Product Category Rules (PCR) for for the development of Environmental Product
570 Declarations (EPDs) of professional cleaning services ⁽⁴⁹⁾ (EPD International, 2026). System
571 boundaries included all stages from production and transport of cleaning products and supplies,
572 through use and maintenance, to end-of-life disposal. The functional unit was defined as “1 m²
573 cleaned per year,” consistent with Nordic Swan and other ecolabels.

574 The assessment revealed that the main environmental hotspots in ICS are the
575 consumption of cleaning products (i.e. detergents and hard surface cleaning products),
576 electricity use for equipment and laundering, and the impacts associated with textile
577 washing. Ingredient selection and packaging for detergents, as well as the durability and
578 laundering of textiles, were found to significantly influence climate and resource indicators.
579 Reusable microfibre textiles reduced chemical and water use but contributed to microplastic
580 emissions during washing.

581 The study noted limitations in available LCA data for ICS, particularly regarding detailed Life Cycle
582 Inventory (LCI) information for service-level activities. As a result, the LCI was constructed from a
583 combination of published data, EPDs, and stakeholder input. The analysis highlighted the need for
584 ongoing data collection and refinement to improve the accuracy and representativeness of future
585 LCA studies.

586 2.6. Task 3.4: Non-LCA impact

587 This task addressed environmental and health challenges in indoor cleaning services (ICS) that were
588 not fully captured by conventional LCA, and identifies key areas for improvement.

589 Occupational Health and Chemical Exposure: Workers in ICS are exposed to hazardous
590 chemicals, particularly through spray applications, which increase risks of asthma and chronic
591 respiratory diseases. Ecolabels such as the EU Ecolabel, Nordic Swan, and Green Seal mitigate these
592 risks by restricting harmful substances, promoting correct dosing, and requiring protective
593 equipment.

594 Microfibre Textiles and Microplastic Pollution: Microfibre textiles are widely used for their
595 cleaning efficiency and reduced water and chemical consumption. However, synthetic fibres shed
596 microplastics during washing and use, contributing to environmental pollution—Europe emits an
597 estimated 13,000 tonnes of microplastics annually from textiles. Mitigation strategies include using
598 durable, high-quality textiles, optimizing washing conditions, avoiding tumble drying, and installing
599 microfibre retention devices in washing machines.

600 Circular Economy Approaches: Circularity in ICS focuses on reusable textiles, durable cleaning
601 machines, and refillable containers. Textile circularity includes reuse, upcycling, recycling, and

⁴⁸ NACE Rev. 2.1. – Statistical classification of economic activities in the European Union – 2025 edition. Available at [this link](#).

⁴⁹ Product Category Rules (PCR) for the assessment of the environmental performance of UN CPC 853 (cleaning services) and the declaration of this performance by an EPD. Available at this [link](#)

602 modular designs. Cleaning machines benefit from product-service systems, takeback,
603 refurbishment, and design for repair. Packaging circularity emphasizes bulk formats, reduced single-
604 use containers, and increased recycled content, while avoiding refillable spray systems due to
605 health risks.

606 2.7. Task 3.5: Analysis of the improvement potential

607 The analysis found that prioritising the use of ecolabelled products, applying cleaning agents in
608 undiluted form where appropriate, ensuring correct dosing, and restricting spray applications had
609 significantly reduced both environmental and occupational health risks in indoor cleaning services.
610 LCA results confirmed that reductions in cleaning product consumption, electricity use, and the
611 frequency of textile washing led to measurable decreases in impacts across climate change,
612 ecotoxicity, and human health categories.

613 The adoption of reusable and durable supplies, especially microfibre products, was recognised as
614 best practice. However, it was also observed that these benefits could only be fully realised if
615 microplastic emissions were effectively managed throughout the product's lifecycle. Incorporating
616 recycled content in textiles provided additional resource efficiency gains, but the analysis
617 highlighted the importance of carefully evaluating the durability and environmental persistence of
618 these materials to ensure that sustainability objectives were met.

619 Overall, the findings demonstrated that a combination of safer product selection, efficient resource
620 use, and improved operational practices had delivered substantial improvements in the
621 environmental and social performance of indoor cleaning services. These insights were used to
622 inform the development of updated ecolabel criteria and best practice recommendations in the new
623 version.

624 3. Scope, definitions and criteria structure

625 3.1. Scope

626 The existing scope (and definitions) text from Decision (EU) 2018/680 is presented below.

Existing scope from Commission Decision (EU) 2018/680

Article 1:

1. The product group 'indoor cleaning services' shall comprise the provision of routine professional cleaning services, performed indoors in commercial, institutional and other publically accessible buildings and private residences. Areas where cleaning services are performed may include, but are not limited to, office areas, sanitary facilities and publically accessible hospital areas, such as corridors, waiting and break rooms.

2. It shall also comprise the cleaning of glass surfaces that can be reached without the use of any specialised equipment or machines.

3. This product group shall not comprise disinfection activities or cleaning activities taking place on production sites or activities for which the cleaning products are provided by the client.

Proposed scope

Article 1:

1. The product group "indoor cleaning services" shall comprise the general cleaning of all types of buildings in line with NACE Rev. 2.1 code 81.21. This includes general (non-specialised) routine cleaning of all types of buildings, such as offices, private dwellings (e.g. houses or apartments), factories, shops, institutions and any other business premises and multi-unit residential buildings. Additionally, routine cleaning of trains, buses, planes, etc. under NACE Rev. 2.1 code 81.23.

The activities expressly included are:

- Interior cleaning of floors, walls, ceilings, fixtures, fittings and any other surfaces located inside the premises.
- Cleaning of associated exterior areas that are integral to the interior cleaning task, such as window panes, door frames, and passageways that are accessed from inside the building.
- Cleaning of communal areas where occupant hygiene is important, such as toilets, canteens and kitchenettes.

These general cleaning activities are mostly interior cleaning, although they may include the non-specialised cleaning of associated exterior areas (for example, windows and passageways). ~~provision of routine professional cleaning services, performed indoors in commercial, institutional and other publically accessible buildings and private residences. Areas where cleaning services are performed may include, but are not limited to, office areas, sanitary facilities and publically accessible hospital areas, such as corridors, waiting and break rooms.~~

2. ~~It shall also comprise the cleaning of glass surfaces that can be reached without the use of any specialised equipment or machines~~ This product group shall not comprise:

- "other building and industrial cleaning activities" included under NACE Rev. 2.1 code 81.22 (including exterior cleaning of buildings and specialised cleaning activities);
- "other cleaning activities" included under NACE Rev. 2.1 code 81.23 (including sanitising, disinfecting and exterminating activities that use biocidal products, etc), except for cleaning of trains, buses and planes, which is included in the scope;
- "landscape service activities" included under NACE Rev. 2.1 code 81.30 (including street sweeping and weed removal);
- cleaning services as part of residential care activities under NACE Rev. 2.1 codes 87.10, 87.20, 87.30 or 87.99;

- cleaning services as part of social work activities under NACE Rev. 2.1 codes 88.10, 88.91 or 88.99;
- washing and polishing of motor vehicles, including trailers and semi-trailers under NACE Rev. 2.1 code 95.31;
- washing and cleaning of textile and fur products” under NACE Rev. 2.1 code 96.10;
- the provision of domestic personal service activities like cooking, washing, cleaning and ironing services, at home for households under NACE Rev. 2.1 code 96.91.

~~3. This product group shall not comprise disinfection activities or cleaning activities taking place on production sites or activities for which the cleaning products are provided by the client.~~

627 Rationale for the proposed scope text

628 The scope aims to clearly delimit which cleaning activities are included within the EU Ecolabel
 629 criteria and which are not, mostly on the grounds of sharing a common function. In the case of the
 630 EU Ecolabel criteria for indoor cleaning services, this function is providing a service of non-
 631 specialised cleaning. The proposed updates incorporate insights from the previous stakeholder
 632 survey, align with comparable criteria found in other relevant ecolabels, and further analysis of
 633 relevant aspects.

634 Summary of changes

- 635 • Introduction of NACE Rev. 2.1 codes to clarify what activities are included in and excluded
 636 from the scope of the EU Ecolabel criteria.
- 637 • Addition of detailed lists of activities explicitly included and excluded.
- 638 • Removal of references to the frequency of activities, to avoid arbitrary distinctions and
 639 distinctions that are dependent on occupation and use patterns.

640 Stakeholder feedback on scope

641 Stakeholders opinions were evenly split between those who considered a need to change the scope
 642 (32%), those who believed it did not need changing (33%), and those who had no opinion (35%).
 643 Among those favouring change (32% of the total), the majority declared that the current scope
 644 should be extended (72% of this group). Suggestions from stakeholders included:

- 645 • Outdoor cleaning “inherently linked to buildings”. The same suggestion specifically
 646 mentioned weed removal and street cleaning.
- 647 • Indoor cleaning activities at industrial production sites.
- 648 • Pest control.
- 649 • Disinfection activities in normal buildings already in the scope.
- 650 • Window cleaning with the aid of machinery.
- 651 • Gardening.

652

653 Comparison of existing ecolabels

654 Table 1. Scope comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
<p>The 'indoor cleaning services' product group covers routine professional cleaning inside commercial, institutional, public, and private buildings, including areas like offices, sanitary facilities, and hospital common spaces. It also includes cleaning glass surfaces accessible without special equipment. It excludes disinfection, cleaning at production sites, and services where clients supply the cleaning products.</p>	<p>Companies can receive the Nordic Swan Ecolabel for ordinary and window cleaning services, but special or other non-covered services cannot be marketed as ecolabelled.</p>	<p>Commercial and institutional cleaning standards apply to both in-house and external services for indoor areas of commercial, public, and industrial buildings, including entryways, but exclude residential buildings and exterior maintenance.</p>	<p>General cleaning services include routine and periodic cleaning for commercial, institutional, and residential premises, but exclude disinfection, building maintenance, and specialist services. Services can be provided by contractors or in-house staff.</p>

655 *Source: Own elaboration*

656 General comments

657 The alignment of the scope with NACE Rev. 2.1 codes ⁽⁵⁰⁾ (European Commission. Statistical Office
 658 of the European Union., 2025) is intended to clarify what is included and excluded, ensuring
 659 consistency with a statistical category that is familiar to the industry. The current scope, as
 660 established in Decision (EU) 2018/680, already closely matches NACE Rev. 2.1 code 81.21. However,
 661 the proposed scope is not a verbatim reproduction of the NACE Rev. 2.1 code 81.21 definition;
 662 instead, it is presented in continuous prose, omitting some non-exhaustive example lists to enhance
 663 brevity and readability.

664 Other NACE codes are also referenced to clearly define exclusions from the proposed scope. In
 665 some cases, these exclusions are summarized within the scope text itself, so that users do not need
 666 to consult the NACE guidance documents to understand what is excluded. Where only a specific part
 667 of a NACE code is excluded, this is explicitly stated in the scope. For example, the scope may refer
 668 to "cleaning services as part of residential care activities" without providing a full definition of all
 669 activities covered by NACE Rev. 2.1 codes 87.10, 87.20, and similar codes.

670 A key motivation for this approach is the need for a separate accounting system for EU Ecolabel
 671 services. By aligning the scope with a single NACE code, it becomes possible to ensure that all
 672 relevant business activities are classified under one code, rather than being dispersed across
 673 several.

⁵⁰ NACE Rev. 2.1. – Statistical classification of economic activities in the European Union – 2025 edition. Available at [this link](#).

674 References to the frequency of activities, such as distinguishing between “routine” and “periodic”
675 cleaning, have been removed. While such distinctions can be useful, they are often arbitrary and
676 highly dependent on the specific use patterns of the buildings being cleaned. For instance, routine
677 cleaning in schools may not meet a minimum frequency during summer holidays, while some
678 periodic activities may occur routinely in high-use areas. Additionally, it is worth mean the
679 difference of cleaning of factories which it is include in the scope and industrial cleaning, out of
680 scope. Under NACE Rev. 2.1 code 81.21, “factories” refers to premises where manufacturing or
681 industrial production takes place. Cleaning factories means providing general cleaning services like
682 sweeping, mopping, dusting, and emptying bins, in non-specialized areas such as offices, corridors,
683 restrooms, and communal spaces within the factory. In contrast, “industrial cleaning” usually refers
684 to specialized services tailored to the needs of industrial processes or machinery, such as cleaning
685 production lines, heavy machinery, industrial equipment, tanks, silos, or hazardous areas, which
686 often require special techniques, equipment, or chemicals.

687 Despite the use of NACE code definitions, certain boundary areas still require clarification to ensure
688 consistent application of the criteria. These include, for example, determining when window cleaning
689 falls within NACE Rev. 2.1 code 81.21, identifying which exterior areas of a building are included,
690 distinguishing between cleaning and maintenance or treatment of floors, and defining the boundary
691 between sanitising and disinfecting activities. These issues may require further discussion with
692 stakeholders, potentially using layman’s terms and diagrams to illustrate where boundaries should
693 be drawn.

694 In summary, the proposed revisions to the scope are primarily intended to clarify and structurally
695 align the product group with NACE Rev. 2.1 code 81.21 (general cleaning of buildings), rather than
696 to significantly broaden or restrict its coverage. The new scope text introduces explicit references to
697 relevant NACE codes, thereby enhancing legal precision and supporting separate accounting for EU
698 Ecolabel services. Sanitisation activities linked to occupant hygiene (such as in toilets and canteens)
699 are explicitly included, while disinfection and pest control activities are clearly excluded. A more
700 comprehensive list of excluded activities is provided, reducing ambiguity and improving clarity,
701 especially regarding specialised cleaning, industrial activities, and outdoor services.

702 The core concept of general indoor cleaning remains unchanged, but the revised scope and
703 definitions are designed to improve coherence, transparency, and enforceability. Some boundary
704 issues, such as those related to window cleaning, floor care, and associated exterior areas, may
705 require further stakeholder engagement and refinement during the ongoing revision process.

706

707 Points for discussion 1 – Scope

708 Stakeholders are invited to reply to the following consultation question/s:

- 709 — Question 1 (Q1) – Do you agree with using NACE Rev. 2.1 codes for the purposes of best defining the
710 Scope? Please, justify your answer.
- 711 — Question 2 (Q2) – Could you share under which NACE Rev. 2.1 codes fall your cleaning services? Please,
712 justify your answer.
- 713 — Question 3 (Q3) – Is there any additional NACE Rev. 2.1 code that, in your view, is relevant to the scope
714 of EU Ecolabel for cleaning services and is not included in the proposal? Please, justify your answer.
- 715 — Question 4 (Q4) – Please, provide any other comments that you deem relevant to any aspect of the
716 *Scope* section

Existing definitions from Commission Decision (EU) 2018/680

Article 2:

For the purposes of this Decision, the following definitions shall apply:

- (1) 'routine professional cleaning services' means professional cleaning services that are provided at least once a month, with the exception of glass cleaning which shall be considered as routine where it is performed at least once every three months;
- (2) 'undiluted cleaning products' means products that must be diluted before use and which have a dilution rate of at least 1:100;
- (3) 'cleaning accessories' means reusable cleaning goods such as cloths, mops and water buckets;
- (4) 'microfibre' means synthetic fibre finer than one denier or decitex/ thread;
- (5) 'applicant's premises' means the premises where the applicant carries out administrative and organisational tasks linked to their activity;
- (6) 'EU Ecolabel indoor cleaning tasks' means tasks performed by staff as part of an indoor routine professional cleaning service.

Proposed definitions

Article 2:

For the purposes of this Decision, the following definitions shall apply:

- ~~(1) 'routine professional cleaning services' means professional cleaning services that are provided at least once a month, with the exception of glass cleaning which shall be considered as routine where it is performed at least once every three months;~~
- (51) "applicant's premises" means the premises where the applicant carries out administrative and organisational tasks linked to their activity;
- (32) "cleaning accessories" means reusable cleaning goods such as cloths (including antistatic cloths), mops, brooms, trolleys, water-buckets and non-reusable such as gloves and tissue paper;
- (3) "disinfection activity" means an activity intended to destroy or irreversibly inactivate pathogenic microorganisms (such as bacteria, viruses, or fungi) on surfaces or in spaces, using specific chemical or physical methods.
- (4) "environmental policy" refers to the set of principles, intentions, directions and actions adopted by an organization, as formally expressed by its top management, to preserve, protect, and improve the quality of the environment, protect human health, ensure the prudent and rational use of natural resources.
- (5) "industrial cleaning" means specialized cleaning services designed to meet the specific requirements of industrial environments, including the cleaning of production lines, heavy machinery, industrial equipment, tanks, silos, or hazardous areas. These services often involve the use of specialized techniques, equipment, or chemicals to ensure effective and safe cleaning of industrial facilities and processes.
- (6) "impurities" means unintended constituents (residuals, pollutants, contaminants, by-products, etc.) that remain in the final product in concentrations less than 100 ppm (0,0100 % w/w, 100 mg/kg) or that remain in its ingredients or raw materials in concentrations less than 1 000 ppm (0,100 % w/w, 1 000 mg/kg). Any unintended constituents present at or above these respective limits for the final product or its ingredients or raw materials shall instead be considered as ingoing substances
- (7) "ingoing substances" means constituents (as pure substances or as part of a mixture, and regardless of amount) that are intentionally added to achieve or influence certain properties of the final product or its ingredients. Substances known to be released from ingoing substances after they have been added (for example formaldehyde and in-situ generated preservatives) shall also be regarded as ingoing substances; unintended constituents present in the final product or in its ingredients or raw materials in concentrations which exceed the permitted concentrations for impurities, shall be considered as ingoing substances.

(8) “landscape service activities”, according to NACE Rev. 2.1 code 81.30, means the planting, care and maintenance of parks and gardens, the planting, care and maintenance of greenery for buildings, the planting of vegetation for protection against noise, wind, erosion, visibility, restoration and related reasons;

(49) “microfibre” means synthetic fibre finer than 1 denier or 0.9 decitex per filament ~~one denier or decitex/ thread~~;

~~(6) ‘EU Ecolabel indoor cleaning tasks’ means tasks performed by staff as part of an indoor routine professional cleaning service.~~

(10) “other building and industrial cleaning activities”, according to NACE Rev. 2.1 code 81.22, means exterior cleaning of buildings of all types, specialised cleaning activities for businesses in food industries, facade and window cleaning, chimney cleaning, cleaning of fireplaces, stoves, furnaces, incinerators, boilers, ventilation ducts and exhaust units, specialised cleaning of industrial machinery, cleaning of water supply pipelines, cleaning of aeraulic ducts, cleaning of new buildings immediately after construction, steam cleaning, sandblasting and similar activities for building exteriors;

(11) “other cleaning activities”, according to NACE Rev. 2.1 code 81.23, means swimming pool cleaning and maintenance activities, cleaning of trains, buses, planes, etc., cleaning of the inside of road and sea tankers, sanitising, disinfecting and exterminating activities, bottle cleaning, street sweeping and snow and ice removal;

(12) “pest control activity” means an activity intended to eliminate or control pests (such as insects, rodents, or other unwanted organisms) within buildings, using chemical, biological, or mechanical methods, in order to protect health, safety, and building integrity;

(13) “ready to use cleaning product” means a cleaning product not to be diluted in water before use;

(14) “sanitisation activity” means an activity intended to reduce the level of microorganisms on surfaces or in spaces to a level considered acceptable according to hygiene standards, without necessarily eliminating all microorganisms;

(215) “undiluted cleaning product” means a cleaning product that should be diluted in water prior to use ~~1:100~~;

(16) “washing and cleaning of textile and fur products”, according to NACE Rev. 2.1 code 96.10, means laundering, dry-cleaning, pressing etc. of all kind of clothing, carpet and rug shampooing, drapery and curtain cleaning, and the provision of combined rental and care services, including washing and cleaning of textiles.

719 Rationale for the proposed definition text

720 The proposed updates take into account findings from the earlier stakeholder survey, similar
721 definitions in other relevant ecolabels, and further analysis of relevant aspects.

722 Summary of changes

- 723 • Two definitions have been removed: “*routine professional cleaning services*” and “*EU*
724 *Ecolabel indoor cleaning tasks*”.
- 725 • Three definitions have been updated: “*cleaning accessories*”, “*microfibre*”, “*undiluted*
726 *cleaning product*”.
- 727 • Some definitions have been added: “*disinfection activity*”, “*environmental policy*”, “*industrial*
728 *cleaning*”, “*impurities*”, “*ingoing substances*”, “*landscape service activities*”, “*other building*
729 *and industrial cleaning activities*”, “*other cleaning activities*”, “*pest control activity*”, “*ready to*
730 *use cleaning product*”, “*sanitisation activity*”, and “*washing and cleaning of textile and fur*
731 *products*”.
- 732 • Definitions have been reordered.

733 Stakeholder feedback on definitions

734 Stakeholders were divided with 30% finding a need to change definitions, 35% declaring that no
 735 change was needed, and 35% expressing no opinion. Overall, stakeholders pointed to a need for
 736 clearer, more precise, and expanded definitions, especially regarding service frequency, product
 737 types, and the distinction between ecolabelled and non-ecolabelled tasks. Some also suggested
 738 adding new definitions to address gaps in the current criteria.

- 739 • For “routine” cleaning services, many suggested increasing the minimum frequency from
 740 monthly to weekly to reduce the need for stronger, less eco-friendly chemicals. Conversely,
 741 window cleaning frequency could be more flexible, possibly extending to every six or twelve
 742 months. More detailed guidance on cleaning frequencies was recommended.
- 743 • For “undiluted cleaning products,” stakeholders requested clearer terminology (preferring
 744 “concentrated”), clarification of dilution ratios, and guidance on solid products like soap bars.
 745 Additional new definitions (e.g., “ozonated water,” “floor care,” “disinfection”) were also
 746 suggested.
- 747 • For “cleaning accessories,” some proposed replacing “water buckets” with broader terms like
 748 “cleaning systems,” though this would need further expert discussion.
- 749 • Some respondents noted a possible legal inconsistency between the definitions of “indoor
 750 routine professional cleaning services” and “EU Ecolabel indoor cleaning tasks.”

751 Comparison of existing ecolabels

752 Table 2. Definition comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	Green Seal 49
Relevant definition on the EU Ecolabel: - Routine professional cleaning services	Relevant definition on the Nordic Swan: - Ordinary cleaning - Floor care - Window cleaning - Special cleaning	Relevant definition on the Green Seal 42: - Residential cleaning services	Relevant definition on the Green Seal 49: - Commercial & Institutional Cleaning Services

753 Source: Own elaboration

754 General comments

755 The definitions supporting the scope have been carefully crafted to maximize clarity and readability,
 756 rather than simply reproducing the full text of NACE Rev. 2.1 code definitions. Key terms related to
 757 NACE codes that define exclusions from the scope have been rewritten to ensure that their meaning
 758 is preserved while making them easier to understand.

759 Several new definitions are proposed, particularly in response to feedback from stakeholders. For
 760 example, the introduction of a definition for “ready to use cleaning products” addresses suggestions
 761 received during the preliminary consultation phase. Definitions for terms such as “sanitisation
 762 activity,” “disinfection activity,” and “pest control activity” are also included, as these are important
 763 for marking the boundaries of the product group’s scope. It should be noted that these definitions
 764 are not drawn from official sources, but have been developed to support the practical application of
 765 the criteria. Feedback on their wording is encouraged.

766 Given the broad range of manual and automated cleaning equipment, including robotic devices, the
767 inclusion of more extensive definitions is considered beneficial. This will help ensure that the use of
768 these terms in the criteria is interpreted consistently.

769 Some definitions are introduced to best interpret the requirements set in the proposed criteria. For
770 example, the definitions “*Ingoing substances*” and “*Impurities*” are introduced to clarify what
771 requirements within criterion PC2(m) *Hazardous substances restrictions* refer to and are directly
772 aligned with the last draft EU Ecolabel criteria for detergents⁵¹, whereas a definition of
773 “environmental policy” is added to help interpret criteria on environmental management systems.

774 Some minor changes have been made to definitions already present in the current criteria to clarify
775 certain aspects (e.g. cleaning accessories) or harmonise the requirements (e.g. microfibres, to set
776 requirements of the same level of ambition regardless of the unit of measurement).

777 The proposed definitions reflect a shift towards greater structural clarity and more precise boundary
778 delineation. In addition to retaining essential operational definitions, the revised text introduces new
779 definitions that correspond to excluded NACE categories and hygiene-related activities, such as
780 sanitisation, disinfection, and pest control. This expands the definitional framework from a limited
781 set of operational terms to a more comprehensive system, supporting consistent interpretation of
782 the scope’s limits. Technical refinements, such as clarifying dilution ratios and defining “ready to
783 use cleaning products,” further enhance the precision of the criteria.

784 Overall, the revised definitions are intended to provide a clearer, more transparent, and enforceable
785 framework for the EU Ecolabel criteria, supporting the improved coherence and application of the
786 revised scope.

787

788 Points for discussion 2 – Definitions

789 Stakeholders are invited to reply to the following consultation question/s:

790 — Question 5 (Q5) - Do you consider that any definitions are missing? Which ones? Please, justify your
791 answer.

792 — Question 6 (Q6) - Please, provide any other comments that you deem relevant to any aspect of the
793 *Definitions* section.

794

795

⁵¹ Available here -> https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/2025-11/Draft_Technical%20Report%203.pdf

796 3.3. Restructuring of the criteria

797 The new proposal includes restructuring both the individual criteria themselves, as well as their
798 grouping into themes. For the purpose of the intermediate versions of the JRC Technical Reports, it
799 is proposed to work with the structure shown on the right-hand side in the figure below. Having all
800 criteria together (mandatory and optional) within a theme makes it easier to see how they fit
801 together and if there are any unwanted gaps or overlaps. Whether or not all of the criteria have to
802 revert into two separate groups of “mandatory” and “optional” can be decided in when it comes to
803 drafting the later versions of the draft legal text, depending on the view of the stakeholders
804 involved in the ongoing revision. The proposed themes are:

- 805 • General Management (GM)
- 806 • Procurement of consumables (PC)
- 807 • Energy and climate (EC)
- 808 • Social criteria (SC)

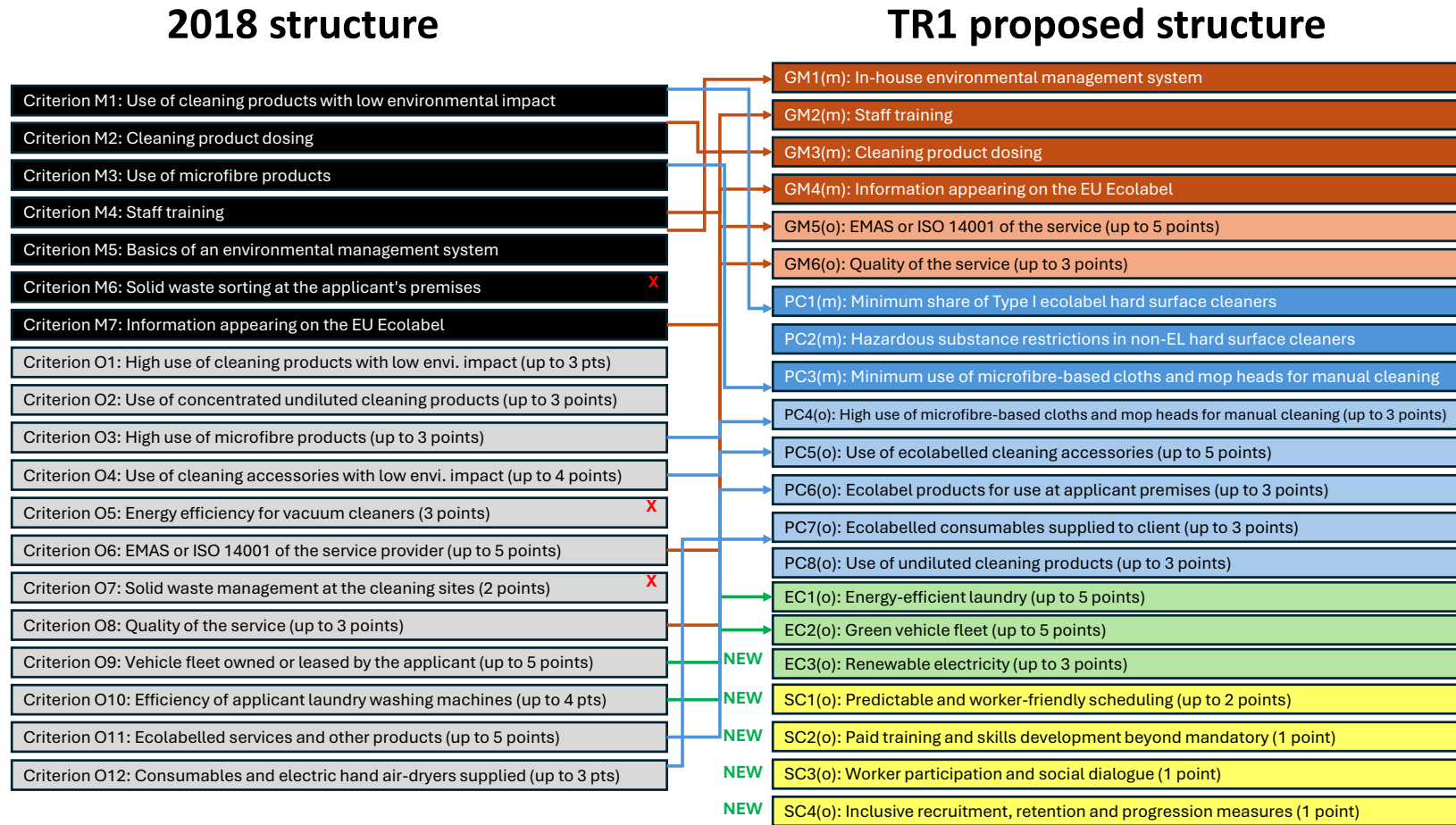
809

810 At a glance, the main changes are:

- 811 • A total of 21 criteria, two more than the 19 published in Decision (EU) 2018/680, though
812 not necessarily more complex than the original ones.
- 813 • This minor increase masks the more significant changes of removing four existing criteria
814 and adding five new ones.

815

Figure 1. Comparison of scope and criteria theme structure in 2018 and in TR1 proposals



816

817

818

Source: Own elaboration

819 Rationale for the proposed restructuring

820 The grouping of EU Ecolabel criteria for indoor cleaning services into the four themes of general
821 management, procurement of cleaning chemicals and accessories, energy, and social provides a
822 coherent and policy-relevant structure for addressing the main sustainability impacts associated
823 with service delivery. Indoor cleaning services are not defined by a single product or emission
824 source, but by the way in which labour, materials, equipment and organisational practices are
825 combined in day-to-day operations across a wide range of client premises. A thematic structure is
826 therefore more appropriate than a purely technical or product-based arrangement, because it
827 reflects how environmental and social performance is actually managed in the sector.

828 The theme of general management captures the organisational systems that underpin service
829 quality and continuous improvement, including staff training, monitoring, recordkeeping, site-
830 specific procedures and communication with clients. These horizontal elements are essential
831 because they determine whether environmental and social good practice is implemented
832 consistently in routine operations.

833 Procurement of cleaning chemicals and accessories forms a second logical theme because
834 the selection and use of detergents, microfibre materials, dosing systems and related consumables
835 strongly influence toxicity, waste generation, durability and resource efficiency. These purchasing
836 decisions are among the most direct levers available to service providers for reducing
837 environmental impacts.

838 The theme of energy is justified because indoor cleaning services make regular use of energy-
839 consuming equipment, including vacuum cleaners, washing machines, washer-driers and, in some
840 cases, other electrically powered devices. Energy-related criteria therefore address an important
841 operational impact area linked to climate and resource objectives. Finally, a social theme is
842 warranted because cleaning services are labour-intensive and sector performance depends heavily
843 on working conditions, training, work organisation and worker engagement. Social aspects are also
844 increasingly relevant in EU policy on sustainable and socially responsible procurement. Taken
845 together, these four themes offer a clear and balanced framework that reflects the main areas in
846 which indoor cleaning services can demonstrate improved sustainability performance, while
847 remaining practical for applicants and competent bodies.

848 Points for discussion 3 – Restructuring of the criteria

849 Stakeholders are invited to reply to the following consultation question/s:

850 — Question 7 (Q7) - Do you agree with the proposed restructuring of the criteria? Please, justify your
851 answer.

852 — Question 8 (Q8) - For the optional criteria, which should be, in your view, the priority of each theme
853 (and thus, the higher or lower score per theme)? Please, justify your answer.

854

Existing general assessment and verification text from the preamble to the Annex to Decision (EU) 2018/680

ASSESSMENT AND VERIFICATION

The specific assessment and verification requirements are indicated within each criterion.

Where the applicant is required to provide declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, these may come from the applicant and/or their supplier(s) and/or their subcontractor(s).

Competent bodies shall give preference to attestations that are issued by bodies accredited under the relevant harmonised standard for testing and calibration laboratories and checked by bodies that are accredited under the relevant harmonised standard for bodies certifying products, processes and services. Accreditation shall be carried out in line with Regulation (EC) No 765/2008 of the European Parliament and of the Council(2).

Information extracted from environmental statements submitted under Regulation (EC) No 1221/2009 of the European Parliament and of the Council(3) may be used as means of proof instead of the attestations mentioned in the previous paragraph.

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

Competent bodies may require supporting documentation and may carry out independent checks.

Competent bodies shall carry out an on-site visit at the applicant's premises and at least one on-site visit of the cleaning service being provided at a cleaning site before the award concession.

After being awarded the EU Ecolabel licence, the applicant shall provide periodically to the competent body a list of the cleaning sites where they provide EU Ecolabel cleaning services, indicating the first and final day of activity for each site. The period between notifications of new cleaning sites shall not exceed four months, unless the applicant has not taken on new contracts. The competent body may perform follow-up on-site visits at the applicant's premises or at a cleaning site periodically during the award period.

As a pre-requisite, the services shall meet all legal requirements of the country (countries) in which the 'indoor cleaning services' are provided. In particular, the company must be 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 valid written contract, shall be paid at least the national or regional minimum wage set by collective agreements or, in the absence of collective agreements, at least the national or regional minimum wage, and shall have working hours complying with national law.

The applicant shall declare and demonstrate that the services are compliant with those requirements by using independent verification or documentary evidence that is without prejudice to the national law on data protection (e.g. 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).

Random staff interview may be carried out by competent bodies during on-site visits.

Proposed general Assessment and Verification text for TR1

ASSESSMENT AND VERIFICATION

For the EU Ecolabel to be awarded to a specific indoor cleaning service, the service provider shall comply with each mandatory requirement and obtain at least 14 points out of the total 43 points available from the optional criteria. The applicant shall provide a written confirmation stating that all the mandatory criteria are fulfilled.

The specific assessment and verification requirements are indicated within each criterion.

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, and/or their supplier(s), and/or their subcontractor(s), as appropriate.

Competent bodies shall give preferential recognition to attestations that are issued by bodies accredited in accordance with the relevant harmonised standard for testing and calibration laboratories, and verification checked by bodies that are accredited in accordance with the relevant harmonised standard for bodies certifying products, processes and services. Accreditation shall be carried out in line with Regulation (EC) No 765/2008 of the European Parliament and of the Council(2).

Information extracted from environmental statements submitted under the eco-management and audit scheme of the Union Regulation (EC) No 1221/2009 of the European Parliament and of the Council(3²) (EMAS) may be used as means of proof instead of 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 checks verifications or site inspections to check compliance with these criteria.

Competent bodies shall carry out an initial on-site visit at the applicant's premises and at least one on-site visit of the cleaning service being provided at a cleaning site before not later than six months after the award concession.

After being awarded the EU Ecolabel licence, the applicant shall provide periodically to the competent body a list of the cleaning sites where they provide EU Ecolabel cleaning services, indicating the first and final day of activity for each site. The period between notifications of new cleaning sites shall not exceed four months, unless the applicant has not taken on new contracts nor extended existing contracts to new sites. If the applicant has not taken on new contracts nor extended existing contracts to new sites, no notifications shall be required until a new contract or an extension of an existing contract has been taken on by the applicant. The competent body may perform follow-up on-site visits at the applicant's premises or at a cleaning site periodically during the award period.

As a pre-requisite, the services shall meet all **respective** legal requirements of the country (countries) in which the 'indoor cleaning services' are provided. In particular, the company must be operational and registered, as required by national or local laws, and its staff legally employed and insured. For this purpose, staff shall have a national legal valid written contract, shall be paid at least the national or regional minimum wage set by collective agreements or, in the absence of collective agreements, at least the national or regional minimum wage, and shall have working hours complying with national law.

The applicant shall declare and demonstrate that the services are compliant with those requirements by using independent verification or documentary evidence that is without prejudice to the national law on data protection (e.g. 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).

Random staff interviews may be carried out by competent bodies during on-site visits.

856 Rationale for the proposed Annex preamble

857 This general preamble text explains some basic horizontal principles that can apply to the
858 assessment and verification of compliance with any particular set of EU Ecolabel criteria for a given
859 product group. It generally refers to the different types of evidence (for example declarations, test
860 reports, etc.) that the competent body shall recognise as relevant proof of compliance for criteria
861 and it is necessary in order to establish the framework and general rules for verification procedures
862 so that they do not need to be repeated in every individual assessment and verification text for
863 each criterion.

864 Summary of changes

865 • Some changes in wording have been made to align the language with that used in the most
866 recently adopted EU Ecolabel criteria.

867 • A clarification has been added, indicating that "new sites" requiring notification to
868 competent authorities may also result from the extension of existing contracts, and are not
869 limited to new contracts and clients.

870 • A modification of the requirement of on-site visits to sites where the cleaning service is
871 provided has been proposed, to facilitate compliance by allowing for these visits to take
872 place after the award concession.

873 Stakeholder feedback on definitions

874 Stakeholders were divided with 42% saw a need to change definitions, 35% did not, and 35% had
875 no opinion. Overall, stakeholders expressed a need for clearer, more precise, and expanded
876 definitions, especially regarding service frequency, product types, and the distinction between
877 ecolabelled and non-ecolabelled tasks. Some also suggested adding new definitions to address
878 gaps in the current criteria.

879 Comparison of existing ecolabels

880 Table 3. Definition comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	Green Seal 49
Relevant definition on the EU Ecolabel: - Routine professional cleaning services	Relevant definition on the Nordic Swan: - Ordinary cleaning - Floor care - Window cleaning - Special cleaning	Relevant definition on the Green Seal 42: - Residential cleaning services	Relevant definition on the Green Seal 49: - Commercial & Institutional Cleaning Services

881 Source: Own elaboration

882 General comments

883 The preamble is typically divided into two sections: a general component that is intended to be
884 applicable across all product groups, and a specific component tailored to the particular product
885 group concerned.

886 Amendments to the general section have been implemented to align the language with that used in
887 the most recently adopted EU Ecolabel criteria, as outlined in [Commission Decision 2025/2607](#) ⁽⁵²⁾
888 (EC, 2025d) concerning paints and varnishes. It should be noted that certain parts of the general
889 text differ from those pertaining to paints and varnishes due to the inclusion of both mandatory
890 and optional criteria. In these sections, an attempt has been made to achieve consistency with the
891 preamble used for Tourist Accommodation Services criteria, currently under revision. However, as
892 both sets of criteria are currently under parallel revision, there is no definitive reference point for
893 comparison at this stage.

894 The specific part of the preamble relating directly to indoor cleaning services has undergone only
895 minor modifications. The core features of the service remain unchanged from the 2018 criteria. The
896 most notable of these minor amendments clarifies that “new sites” requiring notification to
897 competent authorities may also result from the extension of existing contracts, and are not limited
898 to new contracts and clients.

899

900 Points for discussion 4 – Annex preamble

901 Stakeholders are invited to reply to the following consultation question/s:

902 — Question 9 (Q9) - Do you agree with the proposed assessment and verification text? Please, justify
903 your answer.

904

⁵² Commission Decision 2025/2607 of 17 December 2025 establishing the EU Ecolabel criteria for decorative paints, varnishes, and related products, performance coatings and related products, and water-based aerosol spray paints and repealing Decision 2014/312/EU (OJ L, 2025/2607). Available at [this link](#).

905 5. Criteria proposals and rationale

906 5.1. Theme 1: General Management

907 All management-centred criteria from [Commission Decision \(EU\) 2018/680](#) ⁽⁵³⁾ (EC, 2018) have
908 been grouped into a common theme called “general management”. This is the first theme because
909 management generally underpins everything else related to service provision. The prefix “GM” has
910 been added to each criterion so that numbering remains consistent despite changes in other
911 themes. Whether a proposed criterion is mandatory or optional is indicated by “(m)” or “(o)” after the
912 criterion number.

913 Overall, the “general management” theme is organised as follows:

- 914 • GM1(m): In-house environmental management system → formerly criterion M5: Basics of
915 an environmental management system.
- 916 • GM2(m): Staff training → formerly criterion M4: Staff training.
- 917 • GM3(m): Access to cleaning product dosing equipment and instructions → formerly criterion
918 M2: Cleaning product dosing.
- 919 • GM4(m): Information appearing on the EU Ecolabel → formerly criterion M7: Information
920 appearing on the EU Ecolabel.
- 921 • GM5(o): EMAS registration or ISO 14001 certification of the service → formerly criterion O6:
922 EMAS registration or ISO 14001 certification.
- 923 • GM6(o): Quality of the service → formerly criterion O8: Quality of the service.

924 GM1(m): In-house environmental management system

Existing criterion from Commission Decision (EU) 2018/680:

Criterion M5: Basics of an environmental management system

The applicant shall have in place the basic minimum requirements of an environmental management system by implementing the following:

- An environmental policy identifying the most relevant direct and indirect environmental impacts and the organisation's policy toward these impacts;
- A precise action programme ensuring that the company's environmental policy is applied to the services provided. The action programme shall also set targets for the environmental performance on the use of resources (e.g. reduction in cleaning products used) and actions to reduce the environmental impact. Setting targets and actions shall be supported by the

⁵³ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

collection of data on the use of resources and other environmental aspects (e.g. waste generation);

- An internal evaluation process, which shall take place each year to check the organisation's performance against the targets set out in the action programme. Results from the evaluation shall be used by the organisation's management board to continuously improve performance by updating the environmental policy and the action programme.

The environmental policy and the performance of the organisation with regard to the targets set shall be available for consultation by the public at the applicant's premises.

Comments and feedback from clients collected by means of a questionnaire or checklist shall be taken into account.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion supported by a copy of the environmental policy, action programme, evaluation report and procedures put in place for taking into account client comments and feedback. The evaluation report shall include a list of any corrective actions to be undertaken, and it shall be made available to the competent body as soon as possible after the date of application for the EU Ecolabel. Updated documentation shall be provided upon request by the competent body in order to demonstrate compliance during the award period.

Applicants registered with EMAS and/or certified according to ISO 14001, and applicants that are part of an organisation registered with EMAS and/or certified according to ISO 14001, are considered as having fulfilled this criterion if they provide the EMAS registration and/or the ISO 14001 certificate as proof of compliance.

Proposed criterion for TR1:

~~Criterion M5: Basics of an~~GM1(m) In-house environmental management system

~~The applicant shall have in place the basic minimum requirements of an environmental and maintain an environmental management system by implementing the following: covering the EU Ecolabel services. The system shall include:~~

~~(a) An environmental policy approved by top management identifying the most relevant direct and indirect environmental impacts and the organisation's policies related toward these impacts;~~

~~(b) an action programme to implement the environmental policy with at least three objectives, targets, and indicators measuring the progress toward the targets; A precise action programme ensuring that the company's environmental policy is applied to the services provided. The action programme shall also set targets for the environmental performance on the use of resources (e.g. reduction in cleaning products used) and actions to reduce the environmental impact. Setting targets and actions shall be supported by the collection of data on the use of resources and other environmental aspects (e.g. waste generation);~~

~~(c) an annual internal process of evaluation of the progress against the objectives defined and corrective actions; and An internal evaluation process, which shall take place each year to check the organisation's performance against the targets set out in the action programme. Results from the~~

~~evaluation shall be used by the organisation's management board to continuously improve performance by updating the environmental policy and the action programme.~~

(d) procedures to collect and address client feedback that is relevant to environmental performance.

~~The environmental policy and the performance of the organisation with regard to the targets set shall be available for consultation by the public at the applicant's premises. A brief summary of the measures implemented shall be made publicly available at the applicant's premises and online.~~

Assessment and verification:

~~The applicant shall provide a declaration of compliance with this criterion supported by a copy of the filled templates set out in the User Manual or a copy of equivalent documents containing the environmental policy, action programme, evaluation report process and procedures put in place for taking into account comments client feedback procedures put in place.~~

~~Updated documentation and evaluation reports shall be provided upon request by the competent body in order to demonstrate ongoing compliance during the award period. The applicant shall provide details of where the company's environmental policy can be found online.~~

~~Where the applicant holds a valid ISO 14001 certification or EMAS registration covering the scope of the service, such certification or registration shall serve as sufficient evidence of compliance for this criterion.~~

~~The evaluation report shall include a list of any corrective actions to be undertaken, and it shall be made available to the competent body as soon as possible after the date of application for the EU Ecolabel. Updated documentation shall be provided upon request by the competent body in order to demonstrate compliance during the award period.~~

~~Applicants registered with EMAS and/or certified according to ISO 14001, and applicants that are part of an organisation registered with EMAS and/or certified according to ISO 14001, are considered as having fulfilled this criterion if they provide the EMAS registration and/or the ISO 14001 certificate as proof of compliance.~~

925 Rationale for the proposed GM1 criterion (formerly M5)

926 This criterion is crucial because it ensures that indoor cleaning service providers systematically
927 manage and optimise their environmental performance. By requiring an environmental
928 management system, the EU Ecolabel guarantees that applicants identify key environmental
929 impacts, set measurable targets, and monitor progress through regular evaluation. This structured
930 approach drives reductions in resource use and waste, encourages transparency, and supports
931 continual improvement.

932 Summary of changes

- 933 • A new criterion title is suggested
- 934 • Wording is generally simplified for clarity
- 935 • Requirement is now restricted to cover the service awarded the EU Ecolabel.
- 936 • The criterion now requires top management approval and must specifically cover the
937 service awarded the EU Ecolabel.

- 938 • The action programme must include at least three objectives, targets, and indicators, with
939 less emphasis on explicit data collection.
- 940 • Annual evaluation now centres on progress toward objectives and corrective actions, with
941 updated reports provided upon request.
- 942 • Environmental policy must now made available online.
- 943 • Client feedback on environmental performance is integrated into the environmental policy.
- 944 • Compliance is demonstrated with filled templates (see Appendix in TR1) or equivalent
945 documents.

946 Stakeholder feedback on M5 (now GM1(m))

947 Key takeaways about the mandatory environmental management system criteria for the EU
948 Ecolabel indoor cleaning service provider from the preliminary stakeholder survey are:

- 949 • 77% recommend keeping M5 mandatory as it is; 12% suggested minor updates; 5%
950 proposed major updates; and 5% recommended changing it to optional.
- 951 • Among those suggesting changes (22%), regarding difficulty, 7% of the total reported no
952 difficulty, 8% experienced difficulties, and 7% had no opinion—indicating slightly more
953 friction than for several other mandatory criteria.
- 954 • Difficulties were often related to SMEs and specifically to identifying and selecting
955 ‘environmental aspects’ and objectives. Respondents proposed clarifying the expected
956 objectives in action plans, providing templates (policy/action plan/evaluation report), and
957 expanding towards a ‘sustainable management’ approach covering environmental,
958 governance, and social aspects. Some also recommended increasing ambition by requiring
959 ISO 14001 certification rather than just ‘EMS basics’.

960 Comparison of existing ecolabels

961 A comparison with other relevant ecolabel schemes for environmental management systems
962 (EMSs) is provided below, along with references to those criteria.

963 Table 4. Environmental Management System (EMSs) comparison of existing ecolabels on

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
M5 Basics of an environmental management system (policy, action programme, annual evaluation, client feedback)	No single EMS requirement, but comparable elements exist: ongoing compliance/continuous improvement via O20 (changes/non-conformities/complaints) and O21 (maintaining the licence). Certified management systems can support O19 (work instructions).	Partially relevant aspect: operational management via building-specific plans (2.1), internal communications (3.1), and recordkeeping (4.4), but not an explicit environmental policy or action programme requirement.	Closest relevant aspects are: management systems/procedures across procurement (5.3), operations (5.4), spill control (5.5.1), waste programme + annual reporting (5.6), and energy management (5.7).

964 *Source: Own elaboration*

965 Compared to other ecolabels, the existing EU Ecolabel criteria have the most explicit requirements
966 about an EMS-like structure. NZ builds many EMS elements into operational requirements. Nordic
967 Swan and Green Seal focus more on defined routines and licence compliance than formal EMS
968 components.

969 General comments

970 The comments received regarding the lack of clarity on the requirements previously set out in
971 criterion M5 (now GM1), in particular regarding what would constitute a sufficient in-house
972 environmental management system (EMS), are considered justified. Rather than retaining a highly
973 detailed, potentially cumbersome criterion text, the preferred approach is to set out a concise core
974 set of requirements, supported by a series of structured example templates. In principle, such
975 templates would be presented in the User Manual for indoor cleaning services. However, rather than
976 deferring this work until the end of the project, a number of illustrative templates have been
977 prepared, which may serve as default examples where companies do not already use their own
978 internal templates for these purposes (see Appendix I). Stakeholder feedback on these templates
979 would be welcome. They should remain as simple and flexible as practicable, while still providing
980 adequate support for implementation and verification.

981 With regard to the environmental policy, Template A in Appendix I may be used where the applicant
982 does not already have a suitable pre-existing company policy. The policy should be readily
983 accessible to existing and prospective customers at the applicant's premises and online. In order to
984 avoid disproportionate administrative burdens for SMEs, in particular in relation to the creation and
985 maintenance of a dedicated website, it is proposed that publication of the environmental policy
986 simply needs to be "online". This could include the use of a company's social media profile.

987 A deliberately flexible approach is proposed for the action programme (Template B in Appendix I), to
988 minimise unnecessary administrative burden. At least three actions should be identified. Where
989 possible, priority should be given to actions that also support demonstrating compliance with other
990 EU Ecolabel criteria (see the examples provided in Note 3 to Template B in Appendix I). This
991 approach is intended to avoid prescribing a single method of implementation and instead to allow
992 companies to pursue the strategies most appropriate to their own operations.

993 The internal evaluation template (Template C in Appendix I) is intended to serve as the annual
994 reporting mechanism for progress made against the actions included in the action programme.
995 Where the action programme is appropriately aligned with the indicators and records required for
996 demonstrating compliance with the EU Ecolabel criteria, this reporting should already form part of
997 the information needed to maintain the EU Ecolabel licence.

998 Finally, the procedure for handling client complaints relating to environmental performance is
999 conceived as an extension of the standard complaints-handling process. A corresponding template
1000 for compiling this information is also provided in Appendix I (Template D).

1001

1002 Points for discussion 5 – GM1(m): In-house environmental management system

1003 Stakeholders are invited to reply to the following consultation question/s:

1004 — Question 10 (Q10) - Does this criterion seem relevant to you? Should it be removed or moved to
1005 optional? Please, justify your answer.

1006
1007

— Question 11 (Q11) - Do you have any thoughts or opinions about the EMS templates provided in Appendix I?

1008
1009

— Question 12 (Q12) - Is it challenging for the applicant to have in place the management system before the application? Should it be requested to “implement it” instead of “have it in place”?

1010
1011

— Question 13 (Q13) - Please, provide any other comments that you deem relevant to any aspect of *GM1* criterion.

1012

1013 GM2(m): Staff training

Existing criterion from Commission Decision (EU) 2018/680:

Criterion M4: Staff training

The applicant shall make available information, including written procedures or manuals, and training to the cleaning staff performing EU Ecolabel indoor cleaning tasks and to the managers overseeing these cleaning tasks. The training shall cover the following areas, where they are pertinent to the tasks performed by the staff member:

- Staff shall be made aware of what the EU Ecolabel is and what the implications are for the cleaning services.

Cleaning products:

- Staff shall be trained to use the correct product dosage for each cleaning task.
- Staff shall be trained to use the correct dilution rate for undiluted cleaning products and to use the appropriate dosage apparatus.
- Staff shall be trained on how to store cleaning products appropriately.
- The training shall cover the minimisation of the range of cleaning products used as a mean to minimise the risk of overusing and misusing the cleaning products.

Energy saving:

- Staff shall be trained to use unheated water for diluting products, unless otherwise specified by the product manufacturer.
- Where appropriate, staff shall be trained to use the appropriate cycle and temperature for both industrial and household washing machines.
- Where appropriate, staff shall be trained to turn off lights when done with their tasks.

Water saving:

- Staff shall be trained to use microfiber products, where appropriate, to minimise the use of water and cleaning products.

Waste:

- Staff shall be trained to use durable and reusable cleaning accessories and minimise the use of single use cleaning supplies (e.g. gloves), where this does not compromise staff safety and hygiene requirements.
- Staff shall be trained to correctly discard waste water.
- Staff shall receive specific training for waste management in order to help them fulfil the requirements set out in criterion M6 and criterion O7, where applicable.
- Training shall include solid waste management both at the company's premises and at the cleaning sites.

Health and safety:

- Staff shall be informed on health, safety and environmental issues related to cleaning tasks and encouraged to adopt best practices. This shall include information on:
 - safety data sheets and handling of chemicals;
 - ergonomics and applicable national occupational health and safety legislation;
 - removal, cleaning and storage of reusable gloves (if applicable); and
 - road safety and eco-driving (applicable to applicants having their own staff responsible for driving within the cleaning service provision).

Appropriate training shall be provided to all new permanent and temporary staff within six weeks of starting employment. Staff shall be given an update on all the aspects outlined in this criterion at least once a year. Although this update does not have to be a repeat of the initial training session given to all staff, it shall cover all of the environmental issues listed and ensure that relevant staff are fully aware of their responsibilities.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion supported by annual details of the training programme (date and type – initial training or update), its content and information on which staff have followed the training. The applicant shall also provide copies of procedures and staff communication on all training-related issues. The date and type of the staff training shall be recorded as evidence that training updates have taken place.

Where training courses are provided as part of an external training scheme, documentation showing participation (e.g. training certificate) and the content of the training maybe provided as proof of compliance as long as the topics listed in this criterion are covered.

If a company takes over staff, on a permanent or temporary basis, from another cleaning service provider and if the staff have followed training in the previous year, no retraining is required as long as documentation showing participation in a training programme (e.g. training certificate) and the training topics covered can be provided

Proposed criterion for TR1:

Criterion M4:GM2(m) Staff training

All managerial, administrative, supervisory and cleaning staff shall allocated to the service be trained on aspects relating to health, safety and environmental performance of the cleaning service, as indicated in the table below.

General aspect	Specific aspect subject to training	Staff subject to training		
		Managerial or administrative staff	Supervisory staff	Cleaning staff
Health and safety	Ergonomics and applicable national occupational health and safety legislation.	Yes	Yes	Yes

	Road safety, vehicle maintenance requirements and basic vehicle checks.	Yes, if driving a company vehicle is a regular part of job duties.		
	Handling and storage of chemicals.	Yes	Yes	Yes
	Chemical safety data sheets.	Yes	Yes	Yes
	First aid.	Optional	Yes	Optional
	Correct use of personal protective equipment.	Optional	Yes	Yes
	Appropriate clothing during cleaning operations.	Optional	Yes	Yes
	Hygiene (both personal and related to cleaned surfaces).	Optional	Yes	Yes
	Cleaning machinery safety, controls, modes, dosing of water, battery charging and cleaning head changes/checks, waste removal.	Optional	Yes, if directly using this equipment.	
EU Ecolabel	Awareness of the EU Ecolabel and the applicable criteria (i.e. all mandatory criteria and optional criteria for which points have been claimed).	Yes	Yes	Yes
Cleaning products	Effective and efficient use of cleaning products for different cleaning tasks (for example dosage rates, dilution rates and use of dosage apparatus as set in criterion PC4(m)).	Optional	Yes	Yes
Cleaning accessories	Effective and efficient use of cleaning accessories for different cleaning tasks (for example, order of use, optimum combinations with different cleaning products and tailored approaches according to the surfaces to be cleaned).	Optional	Yes	Yes
Energy saving	Default use of ambient cold water for dilution and cleaning operations (unless specific reasons for use of warm water).	Optional	Yes	Yes
	Optimisation of energy efficiency in washing machine cycles and temperature at applicant premises.	Optional	Yes, if directly using this equipment.	
	Minimisation of lighting energy consumption.	Yes	Yes	Yes
	Eco-driving (depending on propulsion technology, e.g. safe coasting to stops, correct gear choice for manuals, closed windows at high-speed travel and reading of fuel consumption trackers).	Yes, if driving a company car is a regular part of job duties.		
	Cleaning of machines and manual vacuum cleaners (e.g. choice of appropriate modes, minimisation of idling in full	Optional	Yes, if directly using this equipment.	

	power modes, cleaning routes and cleaning heads for the level of soiling and type of surface).			
Waste	Appropriate disposal of wastewater and non-flushing of wet wipes.	Optional	Yes	Yes
	Minimisation of single-use cleaning accessories and protective equipment (e.g. cloths, mopheads and gloves).	Optional	Yes	Yes
	Sorting of waste into different streams and correct emptying of recycling bins into larger containers at applicant and client premises.	Yes, for applicant premises	Yes, for both applicant and relevant client premises	

Appropriate training shall be provided to all staff that is expected to provide the EU Ecolabel service for the first time ~~permanent staff and temporary staff~~. In case of in-house training, it shall be completed within six weeks of starting employment. In case of external training, it shall be completed within three months of starting employment.

Untrained staff can only work under the supervision of a suitably trained supervisor, for instance in cases of early employment and short-term contracting arrangements (e.g. temporary substitute staff).

Refresher courses or updated training modules shall be provided to all staff and sub-contractors at least once a year, and may form a part of corrective actions in cases of client complaints about environmental performance. ~~Staff shall be given an update on all the aspects outlined in this criterion at least once a year. Although this update does not have to be a repeat of the initial training session given to all staff, it shall cover all of the environmental issues listed and ensure that relevant staff are fully aware of their responsibilities.~~

Assessment and verification

~~The applicant shall provide a declaration of compliance with this criterion, supported by annual details of the training programme (date and type—initial training or update), it's a copy of training material content and records of training completion for all staff allocated to the service for more than six weeks in case of in-house training, and for more than three months in case of external training.~~

~~Updated staff training records shall be provided upon request by the competent body in order to demonstrate ongoing compliance during the award period. information on which staff have followed the training. The applicant shall also provide copies of procedures and staff communication on all training-related issues. The date and type of the staff training shall be recorded as evidence that training updates have taken place.~~

~~In cases where training courses are provided as part of an external training scheme, documentation showing participation (e.g. training certificate) and an extract of the course content from the provider of the training may shall be provided as proof of compliance and of relevance to selected training as long as the topics listed in this criterion are covered.~~

~~If the applicant acquires another service provider, uses a sub-contractor, or hires already-experienced staff to deliver EU Ecolabel cleaning services to clients, the existing training records of those staff may be used as part of demonstrating compliance with this requirement. Any gaps in~~

training must be fulfilled as described above for new staff. ~~takes over staff, on a permanent or temporary basis, from another cleaning service provider and if the staff have followed training in the previous year, no retraining is required as long as documentation showing participation in a training programme (e.g. training certificate) and the training topics covered can be provided~~

1014 Rationale for the proposed GM2 criterion (formerly M4)

1015 This criterion is proposed because well-trained staff are essential to delivering cleaning services
1016 that meet high standards of health, safety and environmental performance. Having adequately
1017 trained staff helps guarantee that best practices are consistently applied across all aspects of
1018 service delivery. Training on topics such as chemical handling, waste sorting, energy efficiency, and
1019 the correct use of cleaning products and equipment not only reduces environmental impacts and
1020 improves resource efficiency, but also safeguards worker health and safety. Regular updates and
1021 refresher courses ensure that staff remain informed about evolving requirements and
1022 responsibilities, while robust training records provide transparency and accountability.

1023 Summary of changes

- 1024 • Training is now nuanced into managerial, administrative, supervisory, and cleaning staff, not
1025 just cleaning staff and managers.
- 1026 • New elements of training have been included: vehicle maintenance, first aid, dress and
1027 jewellery and cleaning machinery.
- 1028 • In-house training must be completed within six weeks and external training at the earliest
1029 opportunity, with untrained staff supervised until trained.
- 1030 • Refresher or updated training is provided as needed, including for corrective actions, with
1031 annual updates still required.
- 1032 • Compliance requires detailed records and materials, and existing training records for
1033 acquired or subcontracted staff may be used if gaps are addressed.

1034 Stakeholder feedback on M4 (now GM2(m))

1035 Key takeaways about the mandatory staff training criteria from the preliminary stakeholder survey
1036 are:

- 1037 • 61% recommended keeping M4 mandatory as-is; 25% suggested minor updates; 12%
1038 major updates; 0% suggested making it optional; 2% suggested removal.
- 1039 • Among those asked about difficulty, 68% reported no difficulty, 23% reported difficulties,
1040 and 9% had no opinion.
- 1041 • Key takeaways: training is widely seen as essential and generally workable. Where changes
1042 were proposed, they tended to focus on the practicalities of demonstrating compliance (e.g.
1043 recording/traceability), ensuring coverage of relevant environmental topics, and recognising
1044 prior training when staff transfer between providers.

1045 Comparison of existing ecolabels

1046 A comparison with other relevant ecolabel criteria on staff training is provided below, together with
1047 references to relevant criteria in those ecolabels.

1048 Table 5. Staff training comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
M4 Staff training (EU Ecolabel awareness, cleaning products, energy saving, water saving, waste, health and safety)	Direct match: O22 requires a training plan covering products/methods, H&S/environment, waste, eco-driving (if relevant), treated water equipment, and what Swan-labelling means.	Direct match: Section 5 sets initial, site-specific, safety, and continuing training requirements (e.g., 5.1 initial training; 5.4 annual continuing training; 5.5 records).	Direct match: 5.5.2 requires initial + site-specific + annual in-service training, including hazards/SDS, waste minimisation, fuel minimisation, communications, and more.

1049 *Source: Own elaboration*

1050 All four ecolabels require staff training. The existing EU Ecolabel and Green Seal are more
 1051 prescriptive on timing/structure, while Nordic Swan and NZ specify detailed topic coverage via a
 1052 training plan.

1053 General comments

1054 The proposal takes the existing EU Ecolabel criteria and presents the same training topics in a more
 1055 structured way, indicated also which training topics apply to which staff profiles via a matrix
 1056 format. In some cases, existing requirements have been reorganised, for example:

- 1057 • Appropriate storage of cleaning products is moved away from the “cleaning product”
 1058 training module to the “health and safety” module.
- 1059 • Eco-driving is moved away from the “safety” module to the “energy” module.

1060 The repetition of training is reworded as “refresher courses or updated training” to reflect the
 1061 flexibility on the content of the training, which should be based on updates on the relevant aspects.
 1062 The period of one year is kept in alignment with the frequency of the internal evaluation process in
 1063 GM1(m).

1064 The use of cleaning machinery is now also explicitly mentioned, both in terms of health and safety
 1065 and in terms of energy savings. Some requirements have been removed altogether since they were
 1066 not considered to be “training”, these included:

- 1067 • Minimisation of the range of cleaning products used (that is more part of company strategy
 1068 and commercial partnerships with suppliers, standardisation of service provision, or
 1069 environmental policy).
- 1070 • The use of microfibre products to save water is not so much a training element, but rather a
 1071 part of basic environmental policy or part of a shift from single use to reusable cleaning
 1072 accessories.

1073 Finally, the situation with untrained staff (either very new or temporary substitute workers) is now
 1074 clearly stated – basically that they must work under a trained supervisor. Possible situations
 1075 regarding training gaps are also tackled, this is more likely to be an issue in cases where cleaning
 1076 machinery is used – because training has to be tailored to the precise models and brands used.

- 1077 Points for discussion 6 – GM2(m): Staff training
- 1078 Stakeholders are invited to reply to the following consultation question/s:
- 1079 — Question 14 (Q14) - Does this criterion seem relevant to you? Should it be removed or moved to
1080 optional? Please, justify your answer.
- 1081 — Question 15 (Q15) - Do you consider the proposed staff training and refresher training requirements to
1082 be burdensome for your company in terms of time, resources, or administrative effort? Are there
1083 specific challenges for SMEs? Please explain which aspects, if any, would be particularly challenging for
1084 your business.
- 1085 — Question 16 (Q16) – Is any of the content of the training already compulsory for the staff covering the
1086 service under other EU or national legislation?
- 1087 — Question 17 (Q17) - Please, provide any other comments that you deem relevant to any aspect of *GM2*
1088 criterion.
- 1089

1090 GM3(m): Access to cleaning product dosing equipment and instructions

<p>Existing criterion from Commission Decision (EU) 2018/680:</p> <p>Criterion M2: Cleaning product dosing</p>
<p>Staff performing EU Ecolabel indoor cleaning tasks shall have access to appropriate dosage and dilution apparatus for the cleaning products used (e.g. automatic dispensers, measuring beakers/caps, hand pumps, sprays), either at the cleaning site or at the applicant's premises. They shall also have access to the corresponding instructions for correct dosage and dilution.</p> <p><i>Assessment and verification</i></p> <p><i>The applicant shall provide a declaration of compliance with this criterion supported by a list of the apparatus provided and the appropriate documentation showing the instructions on the correct dosage and dilution that is provided to the cleaning staff.</i></p>
<p>Proposed criterion for TR1:</p> <p>Criterion M2:GM3(m): Access to cleaning product dosing equipment and instructions</p>
<p>Staff performing EU Ecolabel the indoor cleaning tasks shall have access to appropriate dosage and dilution apparatus for the cleaning products used (e.g. automatic dispensers, measuring beakers/caps, hand pumps, sprays), either at the cleaning site or at the applicant's premises. They shall also have access to the corresponding instructions for correct dosage and dilution.</p> <p><i>Assessment and verification</i></p> <p><i>The applicant shall provide a declaration of compliance with this criterion supported by: (i) a list of the dosing apparatus provided, and (ii) the appropriate documentation showing the instructions on the correct dosage and dilution that is provided to the cleaning staff.</i></p> <p><i>If already incorporated into the staff training programme in sufficient detail, a copy of the relevant staff training module(s) can be accepted as proof of compliance with point (ii).</i></p>

1091 Rationale for the proposed PC4(m) criterion (formerly M3)

1092 This criterion is important because it ensures that staff have the necessary tools and clear
1093 instructions to accurately dose and dilute cleaning products. Proper dosing reduces unnecessary
1094 chemical use, minimises environmental impact, and helps maintain safe working conditions. By
1095 requiring access to appropriate dosing equipment and instructions, the criterion promotes
1096 consistent, efficient, and responsible cleaning practices. It also supports compliance with
1097 environmental standards and helps prevent errors that could lead to waste or health risks.

1098 Summary of changes

- 1099 • The requirement for staff to have access to appropriate dosing apparatus and instructions
1100 remains unchanged.
- 1101 • Previously, compliance was shown with a list of apparatus and documentation of
1102 instructions; now, relevant staff training modules can also be accepted as proof on the
1103 instructions part if they cover dosing instructions in sufficient detail.

1104 Stakeholder feedback on M2 (now GM3(m))

1105 Key takeaways about the mandatory access to relevant instructions and dosing equipment for
 1106 cleaning products that are used by the EU Ecolabel indoor cleaning service provider from the
 1107 preliminary stakeholder survey are:

- 1108 • 67% recommended keeping M2 mandatory as-is; 19% suggested minor updates; 7%
 1109 suggested major updates; 7% suggested changing M2 to optional; 0% suggested removal.
- 1110 • Among those asked about difficulty (i.e. the subset seeking change), 74% reported no
 1111 difficulty, 11% reported difficulties, and 16% had no opinion.
- 1112 • Comments largely framed dosing as a behavioural/training issue: respondents noted
 1113 missing dosage instructions for staff, recommended limiting access to dosing systems to
 1114 trained staff, and expressed concerns about uncontrolled dosing/impregnation where
 1115 devices are used individually. Some suggested explicitly accommodating super-concentrated
 1116 and ready-to-use products and clarifying terminology (dosage vs dilution) and acceptable
 1117 evidence in the annual data file.

1118 Comparison of existing ecolabels

1119 A comparison with other relevant ecolabel criteria on dilution and dosage instructions and
 1120 accessories is provided below, together with references to relevant criteria in those ecolabels.

1121 Table 6. Dilution and dosing instructions comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
M2 Access for staff to appropriate dosage and dilution apparatus and instructions is required	Direct match: O4 correct dosing (dosing equipment/measuring cups; incl. internal laundry). Related: O5 consumption cap and O22 training plan covers methods/products.	Direct match: 2.7.1 requires dilution control and easily understood directions; 2.7.1.2 requires application methods that prevent overuse; training in 5.1.	Direct match: 5.4(c)-(e) require written dilution/use/disposal instructions, dilution system that minimises exposure, and applicators preventing overuse; training in 5.5.2.

1122 *Source: Own elaboration*

1123 All four ecolabels include dosing/dilution controls; the EU Ecolabel and Nordic Swan are explicit on
 1124 dosing apparatus, while GS-42 and NZ also emphasise worker exposure reduction and preventing
 1125 overuse.

1126 General comments

1127 The general requirements in this criterion have not been modified much, except to clarify that part
 1128 of the evidence of compliance could come straight from the staff training modules. While the
 1129 criterion is important, it is unsure whether it is justified as a standalone criterion if no specific
 1130 details are provided.

1131 There is an obvious incentive for cleaning service providers to use concentrated cleaning products
 1132 (simpler logistics and reduced storage space needed at both client and applicant premises).
 1133 However, overdosing (or under-dilution) of concentrated products prior to use is a particular concern

1134 that needs to be handled via appropriate staff training and supervision. This is not only a matter of
1135 environmental impact, but also cost and safety.

1136 It is recommended to consult with indoor cleaning service providers to try and map out the most
1137 relevant dosing instructions and dosing apparatus for the different cleaning products and cleaning
1138 accessories that are used in indoor cleaning services. This would then provide clear examples of the
1139 type and level of information expected for demonstrating compliance with this criterion.

1140 Points for discussion 7 – GM3(m): Access to cleaning product appropriate dosing equipment and
1141 instructions

1142 Stakeholders are invited to reply to the following consultation question/s:

1143 — Question 18 (Q18) - Does this criterion seem relevant to you? Should it be removed or moved to
1144 optional? Please, justify your answer.

1145 — Question 19 (Q19) – Can you provide clear examples of the dosing equipment and instructions that
1146 should be provided for cleaning products?

1147 — Question 20 (Q20) - Please, provide any other comments that you deem relevant to any aspect of *GM3*
1148 criterion.

1149

1150 GM4(m): Information appearing on the EU Ecolabel

Existing criterion from Commission Decision (EU) 2018/680:

Criterion M7: Information appearing on the EU Ecolabel

The Commission guidelines on the use of the optional label with text box can be found at:

http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf

The optional label with text box shall contain the following text:

"[operator in the sense of art 3.2] is actively taking measures to provide indoor cleaning services with reduced environmental impacts through:

- the use of ecolabelled cleaning products;
- specific staff training;
- an environmental management system."

Assessment and verification

To comply with this criterion the applicant shall provide a declaration of compliance explaining on which support they intend to display the logo.

Proposed criterion for TR1:

~~Criterion M7:GM3(m)~~ Information appearing on the EU Ecolabel

The Commission guidelines on the use of the optional label with text box can be found at:

https://environment.ec.europa.eu/topics/circular-economy-topics/eu-ecolabel/eu-ecolabel-branding_en

Services are uniquely authorised to use the EU Ecolabel logo, accompanied with the corresponding licence number, in email signatures, on company general letterhead paper and on company cars. Services that use the same brand name for EU-Ecolabel-awarded services and non-EU-Ecolabel-awarded services are not authorised to use the EU Ecolabel logo on company letterhead paper, in signatures or on company cars, unless the address of the EU-Ecolabel awarded service is clearly mentioned near the EU Ecolabel logo and licence number.

The optional label with text box shall contain the following text:

"[operator in the sense of art 3.2] is actively taking measures to provide indoor cleaning services with reduced environmental impacts through:

- the implementation of an environmental management system;
- the use of efficient and reusable cleaning accessories;
- the use of ecolabelled cleaning products;
- ~~specific staff training;~~

- ~~an environmental management system.”~~

Assessment and verification

To comply with this criterion the applicant shall provide a declaration of compliance explaining on which support they intend to display the logo.

1151 Rationale for the proposed GM3(m) criterion (formerly M7)

1152 According to the Article 8(3b) of the [EU Ecolabel Regulation \(EC\) 66/2010](#) ⁽⁵⁴⁾ (EC, 2010), for each
1153 product group, key environmental characteristics (typically three) of the EU Ecolabel product may be
1154 displayed in the optional label text box. The guidelines for the use of the optional label with text box
1155 can be found in the "*guidelines for the use of the EU Ecolabel logo*" on the EU Ecolabel Branding
1156 website ⁽⁵⁵⁾.

1157 Summary of changes

- 1158 • Update of hyperlink.
- 1159 • Including a description of where EU Ecolabel logos can be used when awarded for services.
- 1160 • Putting the EMS as the first point, since it encompasses everything, and specifically
1161 referring to its implementation (not just that it exists).
- 1162 • Having a specific point on cleaning “accessories” e.g. microfibre cloths instead of training,
1163 which can be more clearly understood as falling under the management system.

1164 Stakeholder feedback on M7 (now GM4(m))

1165 Key takeaways about information appearing on the EU Ecolabel from the preliminary stakeholder
1166 survey are:

- 1167 • 75% recommended keeping M7 mandatory as-is; 11% suggested minor updates; 2%
1168 major updates; 9% proposed moving it to optional; 4% suggested removal.
- 1169 • Among those asked about difficulty, 64% reported no difficulty, 14% reported
1170 difficulties, and 21% had no opinion.
- 1171 • the main concern was communication when a provider has both ecolabelled and
1172 non-ecolabelled activities. Respondents suggested clarifying where/how the logo may
1173 be displayed and how clients may refer to the ecolabelled service, and rethinking the
1174 wording of the optional sentence.

1175 Comparison of existing ecolabels

1176 A comparison with other relevant ecolabel criteria on information requirements is summarised
1177 below, together with references to relevant criteria in those ecolabels.

⁵⁴ EU Ecolabel Regulation. 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](#).

⁵⁵ See: https://environment.ec.europa.eu/topics/circular-economy-topics/eu-ecolabel/eu-ecolabel-branding_en

1178 Table 7. Information requirements comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
M7 Three key messages about: (i) use of ecolabelled cleaning products; (ii) suitable staff training; (iii) environmental management system	Direct match: Nordic Swan service regulations require licence number + descriptive subtext when using the label.	Direct match: 6.1–6.2 specify trademark use requirements and misleading claims restrictions.	Direct match: 7 sets label-use requirements (licence number and reproduction per licence conditions/brand kit).

1179 *Source: Own elaboration*

1180 All four ecolabels set requirements or controls on the type of information to be communicated with
 1181 their ecolabel. These requirements are administrative rather than environmental, but have
 1182 important relevance in the context of green claims and protection against greenwashing. In the case
 1183 of the EU Ecolabel, requirements about information appearing with the EU Ecolabel logo are set out
 1184 in the [EU Ecolabel Regulation \(EC\) 66/2010](#) ⁽⁵⁶⁾ (EC, 2010).

1185 General comments

1186 One aspect to be analysed relates to the nature of the licence holder, specifically the content of
 1187 Article 3(2) of Decision (EU) 2018/680, which states that:

1188 “An operator that has been awarded the EU Ecolabel for indoor cleaning services shall not provide
 1189 other services which are not covered by the EU Ecolabel unless the indoor cleaning services covered
 1190 by the EU Ecolabel are provided by a sub-division, a subsidiary, a branch or a department of the
 1191 operator that is clearly distinct from it and keeps separate accounting records.

1192 Any other service provided by that operator that falls outside the scope of this Decision, including
 1193 other indoor cleaning services that do not fulfil the requirements set out in this Decision, shall not
 1194 be covered by the EU Ecolabel licence for indoor cleaning services and shall not be marketed as
 1195 such.”

1196 Further developments in the nature of fiscal or administrative distributions in indoor cleaning
 1197 service providers (i.e. based on any discussions about the current Article 3(2)) could have an
 1198 influence on this criterion.

1199 The proposal reflects the three key points of a cleaning service, which are: the cleaner (via the
 1200 management system), the cleaning products used (chemical action), and the cleaning accessories
 1201 used (physical action).

1202 Points for discussion 8 – GM4(m): Information appearing on the EU Ecolabel

1203 Stakeholders are invited to reply to the following consultation question/s:

- 1204 — Question 21 (Q21) - Does this criterion seem relevant to you? Should it be removed or moved to
 1205 mandatory? Please, justify your answer.

⁵⁶ EU Ecolabel Regulation. 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](#).

1206
1207

— Question 22 (Q22) - Please, provide any other comments that you deem relevant to any aspect of *GM4* criterion.

1208

1209 GM5(o): EMAS registration or ISO 14001 certification of the service (up to 5
1210 points)

Existing criterion from Commission Decision (EU) 2018/680:

Criterion O6: EMAS registration or ISO 14001 certification of the service provider (up to 5 points)

The applicant shall be registered under the Union eco-management and audit scheme (EMAS) (5 points) or certified according to the ISO 14001 standard (3 points).

Assessment and verification:

The applicant shall provide the EMAS registration or ISO 14001 certificate as a proof of compliance with this criterion

Proposed criterion for TR1:

~~Criterion M7:~~GM4(o) EMAS registration or ISO 14001 certification of the service (up to 5 points)

The [EU Ecolabel indoor cleaning services offered by the](#) applicant shall be [covered by registered under](#) the Union eco-management and audit scheme (EMAS) (5 points) or [certified according to the ISO 14001 certification standard](#) (3 points).

Assessment and verification:

In cases where points are being claimed under this optional criterion, ~~the~~ applicant shall provide evidence of their EMAS registration or ISO 14001 certification. ~~e-as-a proof of compliance with this criterion.~~

1211 Rationale for the proposed GM5 criterion (formally O6)

1212 EMAS registration and ISO 14001 certification demonstrate a strong organisational commitment to
1213 continuous environmental improvement, legal compliance, and transparent performance monitoring.
1214 These initiatives also provide assurance of independent third-party assessment and verification. By
1215 awarding additional points for these certifications, the EU Ecolabel incentivises higher standards of
1216 environmental management and ensures that certified providers are systematically addressing their
1217 environmental impacts.

1218 Summary of changes

1219 A minor change to the wording has been made so that there is an even clearer link between the
1220 subject matter and the certification.

1221 Stakeholder feedback on O6 (now GM5(o))

1222 Key takeaways about the optional requirement and points relating to EMAS registration or ISO
1223 14001 certification from the preliminary stakeholder survey are:

1224

- 75% recommended keeping O6 optional as-is; 18% suggested minor updates; 5%

1225

- major updates; 2% suggested making it mandatory; 0% suggested removal.

- 1226 • among those requesting changes, 43% reported difficulties, 21% reported no difficulty,
1227 and 36% had no opinion.
- 1228 • comments highlighted an SME disadvantage and mixed market realities: in some
1229 countries most licence holders already have ISO 14001/EMAS, while in others
1230 certification is challenging. Respondents differed on whether EMAS should be rewarded
1231 more than ISO 14001, and suggested redesigning the scoring to reduce barriers for
1232 SMEs.

1233 Comparison of existing ecolabels

1234 A comparison with other relevant ecolabel criteria on EMAS and ISO 14001 requirements is
1235 summarised below, together with references to relevant criteria in those ecolabels.

1236 Table 8. EMAS and ISO 14001 comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O6: (optional) 5 points for EMAS registration or 3 points if ISO 14001 certified.	Related concept: “certified environmental management system” includes ISO 14001/EMAS (definitions); such systems can support fulfilment of O19 (work instructions), but are not a points item.	No ISO 14001 option in GS-42. EMAS is not relevant for this US-based scheme.	Not a points item; ISO 9001/14001 are referenced as examples of systems that may support monitoring/records (Section 7). EMAS is not relevant for this NZ-based scheme.

1237 *Source: Own elaboration*

1238 Only the EU Ecolabel sets explicit requirements on EMAS registration or ISO 14001 certification,
1239 albeit as part of an optional criterion.

1240 General comments

1241 The current approach is considered to strike a reasonable balance between rewarding EMAS
1242 registration (5 points under optional criteria plus fast-track compliance check for GM1(m)).

1243 A brief consultation of the EMAS register ⁽⁵⁷⁾ revealed that there are only 14 organisations
1244 registered under NACE Rev. 2.1 code 81.21 that are EMAS registered. Their main characteristics
1245 were:

- 1246 • Member State: Spain (5), Italy (4), Austria (4), Slovakia (1).
- 1247 • Number of employees: >250, large (9), 50-249, medium (3), 10-49, small (2).

1248 Comments about the unequal administrative burden as a consequence of enterprise size are
1249 supported by the data quoted above, likewise comments about differences in uptake in different
1250 parts of the EU, and the low uptake overall for EMAS. However, these points do not detract from the

⁵⁷ See: <https://webgate.ec.europa.eu/emas2/public/registration/list>

1251 fact that EMAS registration or ISO 14001 certification invariably improves the focus and
1252 management of companies who seek to obtain such credentials.
1253 The criterion is reworded to restrict it's coverage to the EU Ecolabel service (i.e. the subject of
1254 matter).

1255 Points for discussion 9 – GM5(o): EMAS registration or ISO 14001 certification of the service
1256 (up to 5 points)

1257 Stakeholders are invited to reply to the following consultation question/s:

1258 — Question 23 (Q23) - Does this criterion seem relevant to you? Should it be removed or moved to
1259 mandatory? Should it be reduced the points awarded by this criterion? Please, justify your answer.

1260 — Question 24 (Q24) - Do you consider the proposed staff training requirements to be burdensome for
1261 your company in terms of time, resources, or administrative effort? Are there specific challenges for
1262 SMEs? Please explain which aspects, if any, would be particularly challenging for your business.

1263 — Question 25 (Q25) - Please, provide any other comments that you deem relevant to any aspect of *GM5*
1264 criterion.

1265

1266 GM6(o): Quality of the service (up to 3 points)

Existing criterion from Commission Decision (EU) 2018/680:

Criterion O8: Quality of the service (up to 3 points)

Applicants shall earn 2 points if they fulfil the requirements set out below or 3 points if they hold the ISO 9001 or Nordic INSTA 800 certifications.

The applicant shall have appointed a service manager and put in place procedures for monitoring, assessing and improving cleaning quality, as described below. The manager may be the facility manager, a foreman/woman, or a co-ordinator nominated to organise and supervise cleaning.

The applicant shall put in place:

- procedures for monitoring, assessing and improving the cleaning tasks carried out by the applicant (detailed below);
- measures to improve cleaning quality based on, for example, responses to customer satisfaction surveys.

Additionally, the applicant shall draft written instructions, signed by the applicant's management team, that cover the job tasks to be carried out by the service. Those written instructions shall be provided to the cleaning staff and made available for consultation at the applicant's premises and/or cleaning sites.

These written job instructions shall include the following as a minimum:

- description of the task (e.g. office, sanitary, windows cleaning);
- quality (e.g. expected cleanliness, standardised checklist);
- frequency (e.g. once per week);
- objects to be cleaned (e.g. table, chair, sink);
- methods applicable (e.g. equipment and method used for cleaning different areas or objects).

Assessment and verification

The applicant shall provide the ISO 9001 or INSTA 800 certificate or a declaration of compliance supported by:

- a document identifying the manager responsible for the compliance with this criterion (an organisational chart may be used to describe the organisational structure of the applicant and identify the manager);*
- company documents showing the procedures linked to cleaning quality. Note: In case these procedures are compliant with the requirements of EN 13549 (cleaning services, basic requirements and recommendations for quality measuring systems) and/or a regional standard for quality management (e.g. INSTA800: Cleaning quality -measuring system for assessment and rating of cleaning quality), the applicant may provide the certificate of compliance;*

~~- the written job instructions, signed by the applicant's management team covering the job tasks that form part of the service provision.~~

Proposed criterion for TR1:

~~Criterion 08:GM6(o) Quality of the service (up to 3 points)~~

Applicants shall ~~have in place a quality management system covering the service awarded the EU Ecolabel. They shall earn 2 points if they fulfil the requirements set out below via in-house quality management systems, or 3 points if they have been certified by suitably accredited third parties as hold the ISO 9001 or Nordic INSTA 800 compliant certifications.~~

The applicant shall have appointed a service manager nominated to organise and supervise cleaning, and ~~put in place procedures for monitoring, assessing and improving cleaning quality, as described below. The manager maybe the facility manager, a foreman/woman, or a co-ordinator nominated to organise and supervise cleaning.~~

~~The applicant shall put~~ have in place:

- written job instructions for the cleaning tasks to be carried out at each client site;
- procedures for monitoring, assessing and improving the cleaning tasks carried out by the applicant ~~(detailed below)~~;
- measures to maintain or improve cleaning service quality, including based on, ~~for example,~~ responses to customer satisfaction surveys or complaint mechanisms.

~~Additionally, the applicant shall draft written instructions, signed by the applicant's management team, that cover the job tasks to be carried out by the service. Those written instructions shall be provided to the cleaning staff and made available for consultation at the applicant's premises and/or cleaning sites.~~

These written job instructions shall include the following as a minimum:

- description of the task (e.g. office, sanitary, windows cleaning);
- quality (e.g. expected cleanliness, standardised checklist);
- frequency (e.g. once per week);
- objects to be cleaned (e.g. table, chair, sink);
- methods applicable (e.g. equipment and method used for cleaning different areas or objects).

Written job instructions shall be signed by the applicant's management team, be provided to the cleaning staff, both at the client site and applicant premises, and be made available to clients for their own particular sites.

Assessment and verification

In cases where two points are being claimed for the in-house quality management system, the applicant shall provide:

- a document identifying their service manager(s) and the client sites they are responsible for;
- a copy of written job instructions for each client site covered by the EU Ecolabel (in cases where a large number of sites are covered by the application, the competent body may request a randomised sample of site instructions for inspection);
- a description of the procedures used for monitoring, assessing and improving the cleaning tasks conducted at client sites;
- a description of the measures in place for maintaining or improving service quality.

In cases where three points are being claimed, the applicant shall provide a copy of a valid ~~the~~ ISO 9001 or INSTA 800 certificate and demonstrate how these certificates cover the EU Ecolabel cleaning services, ~~or a declaration of compliance supported by:~~

~~*a document identifying the manager responsible for the compliance with this criterion (an organisational chart may be used to describe the organisational structure of the applicant and identify the manager);*~~

~~*company documents showing the procedures linked to cleaning quality. Note: In case these procedures are compliant with the requirements of EN 13549 (cleaning services, basic requirements and recommendations for quality measuring systems) and/or a regional standard for quality management (e.g. INSTA800: Cleaning quality measuring system for assessment and rating of cleaning quality), the applicant may provide the certificate of compliance;*~~

~~*the written job instructions, signed by the applicant's management team covering the job tasks that form part of the service provision.*~~

1267 Rationale for the proposed GM6 criterion (formally O8)

1268 This criterion ensures that cleaning service is delivered consistently with high-quality through
 1269 structured management and clear procedures. By requiring a quality management system either in-
 1270 house or certified to recognised standards such as ISO 9001 or Nordic INSTA 800, the criterion
 1271 promotes systematic organisation, supervision, and continuous improvement of cleaning operations.
 1272 The inclusion of written job instructions, regular monitoring, and mechanisms for client feedback
 1273 and complaint resolution helps maintain service standards, address issues promptly, and adapt to
 1274 client needs.

1275 Summary of changes

- 1276 • The text has been reworded to more clearly distinguish between situations of in-house
 1277 systems and those of certified systems.
- 1278 • Requirements are now explicitly linked to services covered by the EU Ecolabel.
- 1279 • Reference to EN 13549 has been removed because this is an obsolete standard.

1280 Stakeholder feedback on O6 (now GM6(o))

1281 Key takeaways about the optional requirement and points relating to quality management systems
 1282 from the preliminary stakeholder survey are:

- 1283 • 82% recommended keeping O8 optional as-is; 7% suggested minor updates; 4% major
1284 updates; 5% suggested making it mandatory; 2% suggested removal.
- 1285 • among those asked about difficulty, 50% reported no difficulty, 10% reported
1286 difficulties, and 40% had no opinion.
- 1287 • several respondents argued the criterion should be mandatory because quality is
1288 typically required by client contracts and/or already embedded in management systems.
1289 Comments also suggested consolidating certification-related rewards (e.g. O6/O8) and
1290 exploring synergies with other schemes/standards (including other ecolabels).

1291 Comparison of existing ecolabels

1292 A comparison with other relevant ecolabel criteria on quality management is summarised below,
1293 together with references to relevant criteria in those ecolabels.

1294 Table 9. Quality management comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O8: (optional) 3 points for ISO 9001 or INSTA 800 certification or 2 points for in-house systems.	Strong match: O18 requires objective/reproducible quality monitoring (INSTA 800 can fulfil); O19 requires work instructions; O20 complaint/changes procedures.	Strong match: 2.1 requires a building-specific cleaning plan with SOPs/schedules; 3.2 client communications and feedback; procedures across Section 2 support quality control.	Strong match: Clause 6 requires quality monitoring against the service agreement and written communication/feedback; 5.2 agreements define scope and schedules.

1295 *Source: Own elaboration*

1296 All four ecolabel schemes recognise that quality systems underpin environmental outcomes (e.g. the
1297 right level of cleaning avoids overuse of chemicals, energy and water). The EU Ecolabel and Nordic
1298 Swan explicitly cite INSTA 800 and ISO 9001 options.

1299 General comments

1300 No major changes are proposed in TR1 to the criterion on quality management. However, the text
1301 has been extensively revised in order to make it more concise and remove some redundant or
1302 repetitive text. A clearer distinction is made now in the assessment and verification text about the
1303 differences when an in-house quality management system is being assessed (2 points being
1304 claimed) or a third-party certified quality management system applies (3 points being claimed).

1305 Points for discussion 10 – GM6(o): Quality of the service (up to 3 points)

1306 Stakeholders are invited to reply to the following consultation question/s:

1307 — Question 26 (Q26) - Does this criterion seem relevant to you? Should it be removed or moved to
1308 optional? Should it be reduced the points awarded by this criterion? Please, justify your answer.

1309 — Question 27 (Q27) - Do you consider the proposed requirements to be burdensome for your company
1310 in terms of time, resources, or administrative effort? Are there particular challenges for SMEs? Please
1311 explain which aspects, if any, would be particularly challenging for your business.

1312
1313

— Question 28 (Q28) - Is any of the content of the requirement already compulsory under other EU or national legislation?

1314
1315

— Question 29 (Q29) - Please, provide any other comments that you deem relevant to any aspect of *GM6* criterion.

1316

1317 GMX(removed): Solid waste management at the cleaning sites

<p>Existing criterion from Commission Decision (EU) 2018/680: Criterion O7: Solid waste management at the cleaning sites (2 points)</p>
<p>This criterion is only applicable where the applicant's clients provide the means for cleaning staff to sort waste into relevant solid waste streams and only to the solid waste generated during the EU Ecolabel indoor cleaning service provision (e.g. nonreusable packaging of cleaning products, packaging of consumable goods) and the solid waste pre-sorted (e.g. by the staff of the client) at the cleaning sites.</p> <p>Cleaning staff shall sort the solid waste generated during the service provision and dispose of the sorted and pre-sorted waste in the appropriate containers inside or in the vicinity of the cleaning sites. This shall be done wherever the clients provide the means (e.g. waste containers for distinct solid waste streams) for the sorted waste streams to be sent for treatment (e.g. recycling, incineration) or sent to be disposed of in accordance with local or national waste management practices and facilities and/or relevant contracts with recycling services.</p> <p><i>Assessment and verification</i></p> <p><i>The applicant shall provide a declaration of compliance along with a description of the different solid waste streams accepted by the local authorities and/or relevant contracts with recycling services for each of the cleaning sites concerned.</i></p>
<p>Proposed criterion for TR1: Criterion O7: Solid waste management at the cleaning sites (2 points)</p>
<p>Proposed to remove this criterion.</p>

1318 Rationale for the proposed GMX(removed) criterion (formally O7)

1319 This optional criterion is proposed for deletion because it is non-specific, highly conditional, and
1320 impractical to implement and verify in a harmonised way. It does not identify particular waste
1321 streams or minimum performance levels, so expectations for service providers are unclear and
1322 results are difficult to compare. Its applicability depends on the client's agreement and on the
1323 client providing suitable infrastructure for waste sorting on site, as well as on local waste
1324 management practices, available facilities and recycling services. Consequently, the criterion may
1325 be implemented very differently across regions, which weakens its value as a common EU Ecolabel
1326 benchmark.

1327 Moreover, the scope is limited to solid waste generated during the EU Ecolabel indoor cleaning
1328 service provision, even though such waste is normally integrated into the client's overall waste
1329 stream. It is unlikely that clients would maintain dedicated containers and parallel waste logistics
1330 solely for waste generated by the cleaning service, so the practical arrangements required by the
1331 criterion are disproportionate to the likely environmental benefit.

1332 Summary of changes

1333 Criterion is proposed to be removed.

1334

1335 Stakeholder feedback on O7 (now GMX(removed))

1336 Key takeaways about the solid waste sorting at client premises conducted by the EU Ecolabel indoor
1337 cleaning service provider from the preliminary stakeholder survey are:

- 1338 • 74% recommended keeping O7 optional as-is; 4% suggested minor updates; 7% major
1339 updates; 9% suggested making it mandatory; 7% suggested removal.
- 1340 • Among those asked about difficulty, 40% reported no difficulty, 13% reported difficulties,
1341 and 47% had no opinion.
- 1342 • Key takeaways: many stakeholders saw waste sorting at sites as common practice or
1343 contractually required and suggested making it mandatory, merging with M6, or turning it
1344 into a prerequisite. Reported difficulties included practical constraints such as distance to
1345 collection centres; some suggested adding hazardous waste aspects (e.g., bulbs, paints,
1346 e-waste).

1347 Comparison of existing ecolabels

1348 A comparison with other relevant ecolabel criteria on solid waste sorting at client premises is
1349 provided below, together with references to relevant criteria in those ecolabels.

1350 Table 10. Solid waste sorting comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O7 Waste sorting at client premises to be compliant with client requests (quite general)	Related: O14 waste sorting routines (packaging/general waste) and O15 plastic-bag reduction address waste handling in service delivery.	Direct match: 2.4 covers waste/trash collection and recycling requirements at sites; 2.7.3 addresses waste disposal.	Direct match: 5.6.2 requires supporting building recycling programmes and keeping recyclables separate; 5.2(e) also requires discussing/assisting recycling schemes with clients.

1351 *Source: Own elaboration*

1352 All four ecolabels cover waste management at client sites to some degree. The EU Ecolabel treats it
1353 as optional (conditional on client infrastructure), while GS-42 and NZ make it a core operational
1354 requirement independently of client requirements.

1355 General comments

1356 This optional criterion is proposed to be removed because it is non-specific, conditional and in some
1357 ways impractical. Some key points are:

- 1358 • No specific waste streams are identified in the criterion.
- 1359 • The requirement is conditional upon client agreement and the provision of means for waste
1360 sorting on their site. Therefore this could apply to some clients and not others, and could be
1361 applied in different ways in different relevant clients.

1362 • The requirement is conditional on local waste management practices, waste management
1363 facilities and locally active recycling services.

1364 • The requirement is limited to “solid waste generated during the EU Ecolabel indoor cleaning
1365 service provision”, but it is unlikely that there would be dedicated bins just for this type of
1366 waste and a possible parallel set of logistics for waste at the client site seems
1367 unnecessarily complex.

1368 Since this is an optional requirement, if a new proposal returns in TR2 due to stakeholder support, it
1369 should be specific, aim to target best practice in waste management, and actually seek to lead
1370 rather than simply follow whatever clients might dictate – because they cannot be expected to be
1371 experts in this area.

1372 Points for discussion 11 – GMX(removed): Solid waste management at the cleaning sites

1373 Stakeholders are invited to reply to the following consultation question/s:

1374 – Question 30 (Q30) - Do you agree with the removal of this criterion? Or do you think it should be
1375 included as an optional criterion or a mandatory criterion? Please, justify your answer.

1376

1377 GMY(removed): Solid waste sorting at the applicant's premises

Existing criterion from Commission Decision (EU) 2018/680: Criterion M6: Solid waste sorting at the applicant's premises
Only waste generated at the premises of the applicant is covered by this criterion. The applicant shall provide the means for staff to sort solid waste generated at the applicant's premises into the appropriate waste stream categories, to be sent for treatment (e.g. recycling, incineration) or sent to be disposed of in accordance with local or national waste management practices and facilities. <i>Assessment and verification</i> <i>The applicant shall provide a declaration of compliance supported by a description of the different categories of solid waste collected and sorted at the applicant's premises. An indication of the different solid waste streams accepted for further treatment or disposal by the local authorities and/or by private agencies (under relevant contracts) shall also be provided.</i>
Proposed criterion for TR1: Criterion M6: Solid waste sorting at the applicant's premises
Proposed to remove criterion altogether

1378 Rationale for the proposed GMY(removed) criterion (formally M6)

1379 Although solid waste management at the applicant's premises is in principle more relevant than O7,
1380 because it relates to an area that the applicant can actually steer and organise, criterion M6 still
1381 suffers from significant weaknesses. The requirement remains very vague and non-specific,
1382 referring only to "appropriate waste stream categories" in line with local practices, without
1383 describing specific waste streams or performance levels. Verification is largely declarative, relying
1384 on a description of waste categories and what the local system accepts, with no quantitative
1385 indicators or targets. In many Member States, separate collection at commercial premises is already
1386 required or standard practice, so the criterion will often do little more than restate the legal
1387 baseline.

1388 The lack of specificity, dependence on local waste collection frameworks, weak verifiability and only
1389 indirect connection to the EU Ecolabel cleaning service significantly limit the added value of M6 as a
1390 mandatory criterion, even if it addresses an area under the applicant's control.

1391 Summary of changes

1392 Criterion is proposed to be removed

1393 Stakeholder feedback on M6 (now GMY(removed))

1394 Key takeaways about the solid waste sorting at the premises of the EU Ecolabel indoor cleaning
1395 service provider from the preliminary stakeholder survey are:

- 1396 • 70% recommended keeping M6 mandatory as-is; 9% suggested minor updates; 12% major
1397 updates; 7% proposed moving it to optional; 2% suggested removal.
- 1398 • Among those asked about difficulty, 71% reported no difficulty, 12% reported difficulties,
1399 and 18% had no opinion.
- 1400 • many viewed waste sorting as normal practice or a legal/client requirement. The most
1401 prominent issue was responsibility/control. Suggestions included broadening coverage to
1402 include waste at cleaning sites (currently addressed in O7), and adding elements such as
1403 controlling plastic bag use and encouraging recycled-content bags.

1404 Comparison of existing ecolabels

1405 A comparison with other relevant ecolabel criteria on solid waste sorting at licence holder premises
1406 is provided below, together with references to relevant criteria in those ecolabels.

1407 Table 11. Solid waste sorting comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
M6 Waste sorting at applicant premises to be compliant with national or regional regulations	Direct match: O14 requires routines for recycling/sorting packaging and general waste (incl. rinsing chemical packaging before sorting).	Direct match: 2.7.3 requires recycling of waste accepted locally; related: 4.3 minimising package waste; 2.4 addresses waste/recycling handling at sites.	Direct match: 5.6.1 requires a waste management programme covering provider operations (incl. offices), separation of recyclables, and annual reporting to the Trust.

1408 *Source: Own elaboration*

1409 All four ecolabels address waste sorting. The EU Ecolabel specifies applicant premises, while the
1410 others typically cover waste routines more broadly (provider operations and/or client sites).

1411 General comments

1412 The general nature of the mandatory criterion reduces it to little more than compliance with
1413 national and regional regulations. Such a requirement simply adds administrative burden without
1414 any clear benefit.

1415 If such a mandatory requirement is to be reintroduced later in TR2, it should be accompanied by a
1416 specific and well detailed approach to waste sorting and be accompanied by a disclaimer, that
1417 certain waste fractions might not be feasible depending on regional practices and regulations.
1418 However, in those cases, the burden of demonstration on any opting out would be on the applicant.

1419 Points for discussion 12 – GMY(removed): Solid waste sorting at the applicant's premises

1420 Stakeholders are invited to reply to the following consultation question/s:

- 1421 — Question 31 (Q31) - Do you agree with the removal of this criterion? Or do you think it should be
1422 included as an optional criterion or a mandatory criterion? Please, justify your answer.

1423

1424

1425 5.2. Theme 2: Procurement of consumables

1426 All procurement-related criteria from [Commission Decision \(EU\) 2018/680](#) ⁽⁵⁸⁾ (EC, 2018) have been
1427 grouped together into a common theme, titled “procurement of consumables”. As the title implies,
1428 this theme relates to the sourcing, purchasing and use of consumable goods as part of the EU
1429 Ecolabel cleaning service.

1430 The prefix “PC” has been added to each criterion so that numbering remains unaffected by changes
1431 in numbering in other themes. Whether or not a proposed criterion is mandatory or optional is
1432 denoted by “(m)” or “(o)” after the criterion number.

1433 Overall, the “procurement of consumables” theme is structured as follows:

- 1434 • PC1(m): Minimum share of ISO 14024 Type I ecolabel hard surface cleaning products. →
1435 Formerly criterion M1-Use of cleaning products with low environmental impact (a) EU
1436 Ecolabel and other ISO type I label products.
- 1437 • PC2(m): Hazardous substance restrictions in non-ecolabelled hard surface cleaners. →
1438 Formerly criterion M1-Use of cleaning products with low environmental impact (b)
1439 Hazardous substances.
- 1440 • PC3(m): Use of microfibre-based cloths and mop heads. → Formerly criterion M3-Use of
1441 microfibre products
- 1442 • PC4(o): High use of microfibre-based cloths and mopheads (up to 3 points). → Formerly
1443 criterion O3-High use of microfibre products (up to 3 points)
- 1444 • PC5(o): Use of ecolabelled cloths and mop heads) (up to 5 points). → Formerly Criterion O4-
1445 Use of cleaning accessories with low environmental impact (up to 4 points)
- 1446 • PC6(o): Ecolabelled products for exclusive use at applicant premises (up to 3 points). →
1447 Formerly criterion O1 -High use of cleaning products with low environmental impact (up to 3
1448 points)
- 1449 • PC7(o): Other ecolabelled consumable goods supplied to the client (up to 3 points). →
1450 Formerly Criterion O12-Consumable goods and electric hand air-dryers supplied to the
1451 client (up to 3 points)

1452

⁵⁸ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

1453 PC1(m): Minimum share of ISO 14024 Type I ecolabel hard surface cleaning
1454 products

Existing criterion from Commission Decision (EU) 2018/680:

Criterion M1: Use of cleaning products with low environmental impact (a) EU Ecolabel and other ISO type I label products

Only products directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion. Both criteria M1(a) and M1(b) shall be fulfilled by the applicant.

M1 (a) EU Ecolabel and other ISO type I label products

At least 50 % by volume at purchase of all cleaning products used per year, excluding wet wipes, other pre-moistened products and products used for the impregnation and conservation of mops (during the laundry process), shall have been awarded the EU Ecolabel for hard surface cleaning products in accordance with Commission Decision (EU) 2017/1217 ⁽⁵⁹⁾ or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States.

Assessment and verification

The applicant shall provide annual data (commercial name and volume of products) and documentation (including relevant invoices or site inventories) indicating the cleaning products used in the EU Ecolabel indoor cleaning service contracts. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate and/or packaging label showing that it was awarded in accordance with Decision (EU) 2017/1217.

Where other ISO type I label products are used, the applicant shall provide a copy of the type I label certificate and/or packaging label.

Proposed criterion for TR1:

~~Criterion M1: Use of cleaning products with low environmental impact (a) EU Ecolabel and other ISO type I label products~~ PC1(m): Minimum share of ISO 14024 Type I ecolabel hard surface cleaning products

~~*Note: Only products directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion. Both criteria M1(a) and M1(b) shall be fulfilled by the applicant.*~~

~~M1 (a) EU Ecolabel and other ISO type I label products~~

At least ~~50~~75 % by volume at purchase of all liquid hard surface cleaning products used per year ~~excluding wet wipes, other pre-moistened products and products used for the impregnation and conservation of mops (during the laundry process),~~ shall have been awarded the EU Ecolabel for

⁵⁹ Commission Decision (EU) 2017/1217 of 23 June 2017 establishing the EU Ecolabel criteria for hard surface cleaning products (OJ L 180, 12.7.2017, p. 45).

hard surface cleaning products in accordance with Commission Decision (EU) XXXX/XXXX⁽⁶⁰⁾ or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States.

Assessment and verification

The applicant shall provide annual data (commercial name and volume of products) and documentation (including relevant invoices or site inventories) indicating the cleaning products used in the EU Ecolabel indoor cleaning service contracts. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate and/or packaging label showing that it was awarded in accordance with Commission Decision (EU) XXXX/XXXX.

Where other ISO type I label products are used, the applicant shall provide a copy of the type I label certificate and/or packaging label.

1455 Rationale for the proposed PC1(m) criterion (formerly M1(a))

1456 By requiring that at least 75% by volume of all hard surface cleaning products (HSC) are
1457 ecolabelled, the criterion requires a higher share of environmentally friendly cleaning products. The
1458 increase to a 75% minimum share is based on stakeholder feedback, reflecting sector expectations
1459 for greater ambition and alignment with best practices.

1460 Summary of changes

- 1461 • The title of the criterion is now more direct.
- 1462 • Wording now focuses exclusively on liquid, hard surface cleaning products.
- 1463 • Increase in ambition level from 50% by volume at purchase to 75%.

1464 Stakeholder feedback on M1(a) (now PC1(m))

1465 Key takeaways about the mandatory minimum share of ecolabelled hard surface cleaning products
1466 to be used by the EU Ecolabel indoor cleaning service provider from the preliminary stakeholder
1467 survey are:

- 1468 • 68% of respondents recommended keeping M1 mandatory as-is; 21% suggested minor
1469 updates and 11% major updates.
- 1470 • Among respondents indicating a need for change, most reported no compliance difficulty
1471 (56%), while 22% reported difficulties and 22% had no opinion.
- 1472 • Stakeholders frequently suggested increasing the minimum share of ecolabelled products in
1473 M1(a) (e.g., proposing ranges such as 60–75% or 90–95%, and in some cases moving to
1474 only ecolabelled products).

⁶⁰ Commission Decision (EU) XXXX/ XXX refers to the revised version of the Commission Decision (EU) 2017/1217 of 23 June 2017 establishing the EU Ecolabel criteria for hard surface cleaning products (OJ L 180, 12.7.2017, p. 45) once its revision process concludes and it is finally adopted.

- Respondents also highlighted the need to clarify how the share is calculated (volume vs value; issues comparing solids vs liquids; potential site-level specification).

1477 Comparison of existing ecolabels

1478 A comparison with other relevant ecolabel criteria on minimum share of hard surface cleaning Type I product is provided below, together with references to relevant criteria in those ecolabels.

1480 Table 12. minimum share of ISO type I hard surface cleaning products comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
M1(a) At least 50% of hard surface cleaning products must be ecolabelled. A number of product formats explicitly excluded from accounting (e.g. wet wipes).	Strongly aligned, but stricter: O6 requires >=90% ecolabelled cleaning products.	Aligned via purchasing: 4.1 requires only "environmentally preferable" cleaning products/supplies for key categories; Annex A defines this (Type I/ISO 14024 or equivalent).	Aligned via required licensed products: 5.3(b) requires ECA-licensed chemical cleaning products (and certain consumables) for licensed services; 5.3(c) purchase records;

1481 *Source: Own elaboration*

1482 All four ecolabels promote the use of ecolabelled products. EU sets a 50% ecolabel threshold.
 1483 Nordic Swan sets a significantly higher ecolabel share (90%) and takes a different approach to
 1484 defining which products are covered by this accounting. Green Seal and NZ seem to set a 100%
 1485 requirement on ecolabelled products.

1486 General comments

1487 One clear change already proposed in this TR1 is to increase the ambition level of the minimum
 1488 share of ecolabelled products, since the EU Ecolabel (50%) was falling behind other ecolabels (90-
 1489 100%) in this respect. Furthermore, some stakeholders suggested there was room for asking higher
 1490 shares, suggesting feasibility within 60 % to 95 %. Increasing the ambition level is also justified by
 1491 the proposed relaxation of the requirements on non-ecolabelled hard surface cleaning products,
 1492 which is presented next in PC2(m).

1493 The other changes proposed in this TR1 are minor (e.g. title change) and aim to simplify and
 1494 improve clarity. However, further changes are potentially foreseen for the 2nd draft criteria (as
 1495 disclosed in TR2). These would stem from a number of practical aspects that need further
 1496 stakeholder input and research, namely:

- (a) Cleaning products taxonomy: the target would be to build up a detailed taxonomy of the different cleaning products that would or could be normally used for indoor cleaning services falling within NACE Rev. 2.1 code 81.21. From this taxonomy, a mapping could be developed to illustrate which products are covered by ISO Type I ecolabels available on the EU market. This in turn will inform about whether criterion PC1(m) (or any other) need to be adapted accordingly.

1503 (b) Verification of purchasing accounting: consultation with indoor cleaning service
1504 providers should also be carried out in order to generate some worked examples of
1505 inventory keeping, and the different potential logistical permutations for allocating
1506 shares of ecolabelled hard surface cleaning products. This will best inform how to
1507 be more precise on the *Assessment & Verification* while reducing the burden by
1508 aligning (if sensible) with “in-house” accounting practices commonly used by ICS
1509 providers.

1510 In fact, one change proposed that would benefit from stakeholders’ feedback is the proposal to
1511 delimit the scope of this criterion to HSC in liquid form. This is associated, on the one hand, with the
1512 high use of products in this form, notably in as “*ready-to-use*”. On the other hand, this is related to
1513 the verification of purchasing accounting and the understanding that this metric is fit for purpose.

1514 Points for discussion 13 – PC1(m): Minimum share of ISO 14024 Type I ecolabel hard surface
1515 cleaning products

1516 Stakeholders are invited to reply to the following consultation question/s:

1517 — Question 32 (Q32) - Does this criterion seem relevant to you? Should it be removed or moved to
1518 optional? Please, justify your answer.

1519 — Question 33 (Q33) – Can you help us to define a taxonomy of cleaning products (i.e. cleaning
1520 chemicals) that are used in the indoor cleaning services defined in NACE code 81.21? Please, provide a
1521 detailed response.

1522 — Question 34 (Q34) – Specifically for providers of indoor cleaning services and competent bodies with
1523 experience in applications: what are the challenges with keeping inventories of ecolabelled and non-
1524 ecolabelled products, and what is the best approach to this in the criteria? Are site-specific inventories
1525 required? Should specific calculations be provided? Which are the most common units/metrics used?
1526 Please, justify your response.

1527 — Question 35 (Q35) - Please, provide any other comments that you deem relevant to any aspect of *PC1*
1528 criterion.

1529

1530 PC2(m): Hazardous substance restrictions in non-ecolabelled hard surface
 1531 cleaners

Existing criterion from Commission Decision (EU) 2018/680:

Criterion M1(b): Use of cleaning products with low environmental impact (b) Hazardous Substances

Only products directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion. Both criteria M1(a) and M1(b) shall be fulfilled by the applicant.

[...]

M1(b) Hazardous Substances

(i) All products that have not been awarded the EU Ecolabel for hard surface cleaning products or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States shall not contain substances listed in EU Ecolabel Criterion 4(a)(i) for hard surface cleaning products, regardless of concentration.

(ii) All products that have not been awarded the EU Ecolabel for hard surface cleaning products or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States shall not contain substances listed in EU Ecolabel criterion 4(a)(ii) for hard surface cleaning products, in amounts higher than those authorised in the criterion.

(iii) All products that have not been awarded the EU Ecolabel for hard surface cleaning products or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States shall not be classified and labelled as being acutely toxic, a specific target organ toxicant, a respiratory or skin sensitiser, carcinogenic, mutagenic or toxic for reproduction, or hazardous to the environment, in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council ⁽⁶¹⁾, and as interpreted according to the hazard statements listed in the table below.

Wet wipes and other pre-moistened products shall comply with this requirement.

Table 1. Restricted hazard classifications and their categorisation

Acute toxicity	
Category 1 and 2	Category 3
H300 Fatal if swallowed	H301 Toxic if swallowed
H310 Fatal in contact with skin	H311 Toxic in contact with skin
H330 Fatal if inhaled	H331 Toxic if inhaled
H304 May be fatal if swallowed and enters airways	EUH070 Toxic by eye contact
Specific target organ toxicity	
Category 1	Category 2

⁶¹ Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1).

H370 Causes damage to organs	H371 May cause damage to organs
H372 Causes damage to organs through prolonged or repeated exposure	H373 May cause damage to organs through prolonged or repeated exposure
Respiratory and skin sensitisation	
Category 1A	Category 1B
H317: May cause allergic skin reaction	H317: May cause allergic skin reaction
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled
Carcinogenic, mutagenic or toxic for reproduction	
Category 1A and 1B	Category 2
H340 May cause genetic defects	341 Suspected of causing genetic defects
H350 May cause cancer	H351 Suspected of causing cancer
H350i May cause cancer by inhalation	
H360F May damage fertility	H361f Suspected of damaging fertility
H360D May damage the unborn child	H361d Suspected of damaging the unborn child
H360FD May damage fertility. May damage the unborn child	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child	H362 May cause harm to breast fed children
H360Df May damage the unborn child. Suspected of damaging fertility	
Hazardous to the aquatic environment	
Category 1 and 2	Category 3 and 4
H400 Very toxic to aquatic life	H412 Harmful to aquatic life with long-lasting effects
H410 Very toxic to aquatic life with long-lasting effects	H413 May cause long-lasting effects to aquatic life
H411 Toxic to aquatic life with long-lasting effects	
Hazardous to the ozone layer	
H420 Hazardous to the ozone layer	

Assessment and verification:

Points (i) and (ii): the applicant shall provide a signed declaration of compliance supported by declarations from suppliers confirming that the listed substances have not been included in the product formulation regardless of concentration or above the specified limits.

Point (iii): the applicant shall provide a declaration of compliance supported by the safety data sheets for all products that have not been awarded the EU Ecolabel for hard surface cleaning products or another ISO type I label.

Proposed criterion for TR1:

Criterion M1(b): Use of cleaning products with low environmental impact (b) Hazardous Substances PC2(m) Hazardous substance restrictions for non-ecolabelled hard surface cleaning products









All liquid hard surface cleaning products purchased for use in the provision of the EU Ecolabel cleaning service and which do not carry an ISO 14024 Type I ecolabel shall comply with the following restrictions on hazardous substances:

(i) shall not contain any ingoing substances or known impurities in concentrations exceeding 0,10 % weight by weight that meet the criteria referred to in Article 57 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council that have been identified according to the procedure described in Article 59 of that Regulation and included in the candidate list for substances of very high concern for authorisation.

(ii) shall not contain any ingoing substances or known impurities in concentrations exceeding 0,10 % weight by weight that are classified as carcinogenic or toxic to reproduction in concentrations exceeding 0,10% weight by weight in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council.

(iii) shall not contain any ingoing substances or known impurities in concentrations exceeding 1 % weight by weight that are classified as mutagenic, acutely toxic, an aspiration hazard, a specific target organ toxicant, a respiratory or skin sensitiser, hazardous to the aquatic environment, hazardous to the ozone layer, an endocrine disruptor, persistent, bioaccumulative and toxic (PBT) or persistent, mobile and toxic (PMT) in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council.

(iv) shall not be classified in accordance with Regulation (EC) No 1272/2008 with any hazard that require the placement of the following safety hazard codes and pictograms:

		
GHS01 Exploding Bomb	GHS02 Flame	GHS03 Flame over circle
		
GHS04 Gas cylinder	GHS05 Corrosion	GHS06 Skull and Crossbones
		
	GHS08 Health Hazard	GHS09 Environment

Assessment and verification:

The applicant shall provide a declaration of compliance with this criterion, supported by a list of all the non-ecolabelled hard surface cleaning products used to provide the EU Ecolabel cleaning services and copies of safety data sheets for each listed cleaning product.

Section 3 of the safety data sheets shall offer proof of compliance with points (i), (ii) and (iii). It shall reveal that:

— no substances referred to in point (i) above, and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006, are present in concentrations exceeding 0,10 % by weight;

— no substances referred to in point (ii) above, are present in concentrations exceeding 0,10 % by weight;

— no substances referred to in point (iii) above are present in concentrations exceeding 1 % by weight.

Section 2 of the safety data sheets, or the product packaging itself, shall offer proof of compliance with point (iv) by the absence of the pictograms listed above.

1532 Rationale for the proposed PC2(m) criterion (formerly M1(b))

1533 Apart from the restructuring, the requirements for non-ecolabelled products have been greatly
 1534 simplified and aligned with information that suppliers are legally bound to provide upon request, if
 1535 the conditions stated in criterion PC2(m) apply.

1536 Summary of changes

- 1537 • A substantial change from the existing M1(b), shifting the requirement from a cross-
 1538 reference to a very broad and comprehensive set of hazardous substance restrictions for
 1539 voluntary ecolabel detergents to requirements firmly rooted in mandatory REACH
 1540 legislation.
- 1541 • Requirements are now proposed to be fully assessed and verified using safety data sheets,
 1542 without requiring many additional declarations from upstream suppliers as per (M1(b)).
- 1543 • Products falling under the scope of this criterion are now more precisely defined (i.e. liquid
 1544 hard surface cleaning products).
- 1545 • As a result of the former, significant text and structure change.

1546 Stakeholder feedback on M1(b) (now PC2(m))

1547 Stakeholders highlighted the need to update criterion M1(b), which addresses hazardous
 1548 substances, to reflect recent changes in relevant regulations and the latest EU Ecolabel criteria for
 1549 other product groups. Respondents emphasized that aligning M1(b) with current regulatory
 1550 requirements and ecolabel standards is important to ensure consistency and maintain the criterion's
 1551 relevance.

1552 Comparison of existing ecolabels

1553 A comparison with other relevant ecolabel criteria on this criterion is provided below, together with
 1554 references to relevant criteria in those ecolabels.

1555 Table 13. Hazardous substances restriction comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
- Products without the EU Ecolabel (or an equivalent ISO type I)	- O9: Updated according to changes in ECHA and the EU.	- Criterion 4.1 directly restricts hazardous substances by requiring	All chemical cleaning products used in licensed cleaning

<p>ecolabel) must not contain certain hazardous substances listed in the EU Ecolabel criteria for hard surface cleaning products, either at all or above specified limits.</p> <p>- Such products must not be classified or labelled as acutely toxic, organ toxicants, sensitizers, carcinogenic, mutagenic, toxic for reproduction, or hazardous to the environment, according to EU regulations.</p> <p>- Wet wipes and pre-moistened products must also comply.</p>	<p>- O10: Updated according to changes in ECHA and the EU, and more excluded substances are added to the list.</p> <p>These criteria (O9 and O10) specifically address the restriction and prohibition of hazardous substances, including PFAS, endocrine disruptors, CMR substances, microplastics, and other chemicals of concern</p>	<p>the use of certified environmentally preferable cleaning products. However, GS-42 does not include its own explicit list of prohibited substances; instead, it relies on the requirements of recognized Type I ecolabels which maintain and enforce their own lists of prohibited substances.</p>	<p>services must be Eco Choice Aotearoa (ECA)-licensed products.</p>
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1556 *Source: Own elaboration*

1557 General comments

1558 The general concept of criterion M1(b) is to require equivalent “safety guarantees” as per relevant
1559 ecolabel schemes, as can be seen in the legal text of the criteria *in force* while citing the EU
1560 Ecolabel criteria for hard surface cleaning products (HSC). Indeed, it makes cross-reference to
1561 particular EU Ecolabel HSC sub-criteria also uses legal text that is directly aligned with it (For
1562 example, see text in clause (iii) and the associated *Table 1 - Restricted hazard classifications and*
1563 *their categorisation*). However, this poses several difficulties in terms of how to verify that products
1564 meet such requirements. Unlike products awarded with an ecolabel, those in the market could find
1565 difficulties in being aware of the implications of these requirements and where to find such proofs
1566 of verification via declarations. Therefore, setting “the bar” at the same level as an ecolabel could
1567 discourage applicants, as described in detail below, thus resulting in lower pooled environmental
1568 benefits achieved due reduced number of ecolabelled products. Consequently, a compromise option
1569 is proposed in this TR1 with PC2, by which requirements are set along the same lines as per M1(b),
1570 but with lesser degree of stringency than for ecolabelled ones, as a way to reduce barriers for
1571 uptake, thus pursuing greater pooled desirable impacts.

1572 A first change is the restriction on this criterion scope to HSC products in liquid form. This is
1573 performed in alignment with the changes proposed in PC1(m) criterion (formerly M1(a)).

1574 At one level, simplification has been achieved by avoiding cross-references to other ecolabel criteria
1575 (which are subject to periodic revision) and to long lists of CLP hazards and restrictions without any
1576 immediately obvious associated concentration levels.

1577 At another level, simplification has been achieved by reducing the breadth (i.e. number of hazards)
1578 and depth (i.e. concentration limits) of the restrictions. While setting ambitious and onerous
1579 requirements on non-ecolabelled cleaning products has the incentive of encouraging service
1580 providers to source and procure more ecolabelled cleaning products, there are a number of reasons
1581 why this is counterproductive:

1582 • It creates a major barrier to obtaining the EU Ecolabel because the existing restrictions are
1583 very complex and not understandable by normal suppliers or producers who are not very
1584 familiar with the EU Ecolabel criteria for hard surface cleaning products.

1585 • It places existing licence holders in a precarious position in case they find it necessary to
1586 unexpectedly turn to non-ecolabelled products. For example in the case that a major
1587 supplier ceases to market ecolabel cleaning products (e.g. due to change of their
1588 commercial strategy, loss of licence due to criteria revision, etc.).

1589 • It is disproportionately challenging for SMEs, who are expected to make highly detailed
1590 information requests to suppliers which they are unlikely to fully understand themselves.

1591 • Another disproportionate challenge for SMEs is that they have little or no influence on the
1592 timeliness of supplier responses, or be able to gauge if the responses are suitable.

1593 • The competent bodies then need to assess and verify whether or not these products are
1594 compliant.

1595 • These very detailed requirements apply equally for ALL non-ecolabelled cleaning products
1596 used, regardless of the actual quantity used.

1597 To avoid all of these disadvantages and burdens, the restrictions have been set at the level which is
1598 supported by REACH and CLP legislation. The alignment is centred around the safety data sheet
1599 (SDS) and applies as follows:

1600 • REACH Article 31(1)(a) requires an SDS according to Annex II of REACH to be produced in
1601 cases where the cleaning product is classified with any physical, health or environmental
1602 hazards.

1603 • Section 3 of the SDS would have to state if any ingredients that are SVHCs or classified as
1604 carcinogenic or toxic to reproduction and are present in concentrations exceeding 0,1% by
1605 weight (see REACH Article 31(3)(b)).

1606 • Section 3 of the SDS would have to state if any ingredients that are classified as
1607 mutagenic, acutely toxic, an aspiration hazard, a specific target organ toxicant, a respiratory
1608 or skin sensitiser, hazardous to the aquatic environment, hazardous to the ozone layer, an
1609 endocrine disruptor, persistent, bioaccumulative and toxic (PBT) or persistent, persistent,
1610 mobile and toxic (PMT) and are present in concentrations exceeding 1% by weight (see
1611 REACH Article 31(3)(a)).

1612 • Section 2 of the SDS would have to state any classification of the cleaning product and if
1613 any of the pictograms listed in the proposed criteria need to be displayed on product
1614 packaging.

1615 In cases where the first and third points do not apply, i.e. the cleaning product is not classified with
1616 any CLP hazard, an SDS must still be supplied upon request IF it contains substances to the extent
1617 that the proposed EU Ecolabel criterion would not be met (i.e. $\geq 0.1\%$ by weight SVHC or CMR
1618 ingredients (or known impurities).

1619

1620 Points for discussion 14 – PC2(m): Hazardous substance restrictions in non-ecolabelled hard
1621 surface cleaners

1622 Stakeholders are invited to reply to the following consultation question/s:

1623 – Question 36 (Q36) - Does this criterion seem relevant to you? Do you have any remark on it? Please,
1624 provide a detailed answer.

1625 – Question 37 (Q37) - Please, provide any other comments that you deem relevant to any aspect of *PC2*
1626 criterion.

1627

1628 PC3(m): Minimum use of microfibre-based cloths and mop heads for manual
1629 cleaning

Existing criterion from Commission Decision (EU) 2018/680:

Criterion M3: Use of microfibre products

Only non-disposable textile cleaning accessories directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.

At least 50 % of the textile cleaning accessories (e.g. cloths, mop heads) used per year shall be made of microfibre.

Assessment and verification

The applicant shall provide annual data (type and quantities of products) and documentation (including relevant invoices or site inventories) indicating the textile cleaning accessories used and specifying which textile cleaning accessories are made of microfibre.

Proposed criterion for TR1:

~~Criterion M3-PC3(m): Use of microfibre-based non-disposable cloths and mopheads products for manual cleaning~~

Note 1: the counting of non-disposable "cloth" purchasing shall include microfibre cloths, cotton terry cloths, woven synthetic wipers and glass/polishing cloths.

Note 2: this criterion refers to cloths and mopheads used during manual cleaning operations only, not consumables used by automated or semi-automated cleaning machines or robots.

Note 3: only non-disposable cloths and mopheads directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.

~~Only non-disposable textile cleaning accessories directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.~~

The following minimum share of purchased cloths and mopheads shall be used in EU Ecolabel indoor cleaning services:

- ~~At least 50 % (by number of units) of the textile cleaning accessories (e.g. cloths, mop heads) used per year purchased shall be made of~~ microfibre-based and be washable and reusable.
- at least 70 % (by number of units) of mopheads purchased for indoor floor cleaning shall be microfibre-based and be washable and reusable.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion, supported by a purchasing record and inventory for all cloth types that fit in the product types listed in the note above. Purchasing and inventory data for mopheads shall be separately reported. Each inventory item shall be flagged to inform whether: (i) it is microfibre-based, and (ii) it carries a valid ISO 14024 Type I ecolabel.

The purchasing schedule shall be updated annually and shall be provided upon request by the competent body in order to demonstrate ongoing compliance during the award period. ~~data (type and quantities of products) and documentation (including relevant invoices or site inventories) indicating the textile cleaning accessories used and specifying which textile cleaning accessories are made of microfibre.~~

1630 Rationale for the proposed PC3(m) criterion (formerly M3)

1631 By setting minimum thresholds of at least 50% for cloths and 70% for mopheads this criterion
1632 encourages a shift towards microfibre-based cloths and mopheads. These microfibre-based
1633 products align with best environmental practices, as these products typically have a longer lifespan
1634 and lower overall environmental impact when properly maintained. Requiring detailed purchasing
1635 and inventory records ensures transparency and ongoing compliance, further strengthening the
1636 credibility and environmental integrity of the EU Ecolabel for indoor cleaning services.

1637 Summary of changes

- 1638 • The proposed criterion clarifies that it applies only to cloths and mopheads used in manual
1639 cleaning, and specifies which types of cloths are included in the count, while explicitly
1640 excluding consumables for automated or robotic cleaning.
- 1641 • The requirement for microfibre content is now split: at least 50% (by number of units) of
1642 cloths and at least 70% (by number of units) of mopheads must be washable, reusable, and
1643 microfibre-based, compared to the previous single 50% (by quantity) requirement for all
1644 textile accessories.
- 1645 • Applicants must now provide a declaration of compliance, detailed purchasing and inventory
1646 records for all relevant cloths and mopheads, with each item flagged for microfibre content
1647 and ecolabel status, and update these records annually for ongoing compliance.
- 1648 • As a result of the former, significant text and structure change.

1649 Stakeholder feedback on M3 (now PC3(m))

1650 Key takeaways about the mandatory minimum share of “textile cleaning accessories” to be made of
1651 microfibre that are used by the EU Ecolabel indoor cleaning service provider from the preliminary
1652 stakeholder survey are:

- 1653 • 56% recommended keeping M3 mandatory as-is; 28% suggested minor updates; 9% major
1654 updates; 7% proposed moving M3 to optional; 0% suggested removal.
- 1655 • Among those asked about difficulty, 68% reported no difficulty, 16% reported difficulties,
1656 and 16% had no opinion.
- 1657 • compared to M1/M2, M3 attracted more calls for change. Comments pointed to the need to
1658 reflect concerns about microplastics release and to consider alternatives or recyclable
1659 microfibres. Respondents also highlighted that microfibre use is often combined with
1660 chemical products, suggesting a need to consider criteria interactions (e.g. product use and
1661 textiles) when revising thresholds and requirements.

1662

1663

1664 Comparison of existing ecolabels

1665 A comparison with other relevant ecolabel criteria on microfibre cleaning accessories is provided
 1666 below, together with references to relevant criteria in those ecolabels.

1667 Table 14. Microfibre cleaning accessories comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
M3 At least 50% of “textile cleaning accessories” shall be made of microfibre	No direct % requirement for microfibre share. Related elements: P5 gives points for recycling/reuse of (microfibre) cloths/mops; broader consumable minimisation via O5 (consumption cap).	Partial match: 2.3.2 requires reusable cloths or microfiber technology whenever appropriate and laundering before reuse; no % threshold.	Partial match: 5.4(g) promotes methods that minimise chemical use (example: microfibre cloths); 5.3(e) prefers reusable tools/cloths/mops.

1668 *Source: Own elaboration*

1669 The EU Ecolabel is uniquely quantitative on microfibre share. The other schemes generally
 1670 encourage microfibre/reusables without setting a mandatory percentage. Accounting would have to
 1671 rely purely on purchase records and inventories in cases where the result is not close to 100%.

1672 General comments

1673 The concerns about potential release of microplastic release during the use and laundry of
 1674 microfibre cloths and mopheads is well justified. However, the environmental benefits of using
 1675 microfibre-based products are considered to outweigh these concerns. The main benefits are
 1676 especially well quantified with microfibre mopheads and floor cleaning, and include:

- 1677 1. Reduced chemical use (-95%): due to highly effective soil removal under mechanical action
 1678 [\(EPA, 2002\)](#).
- 1679 2. Reduced water use (-95%) and associated quicker floor drying times [\(EPA, 2002\)](#).
- 1680 3. Improved ergonomics for cleaning staff [\(Desa et al., 2004\)](#).

1681 The reductions in chemical consumption and water consumption also deliver many upstream and
 1682 downstream environmental benefits via avoided impacts in the processes relating to chemical
 1683 production, water treatment and wastewater disposal.

1684 With microfibre cloths, the first two advantages listed above still apply, but would be more difficult
 1685 to quantify in comparative studies.

1686 Nonetheless, some scope needs to remain for the use of other types of cloths which might not be
 1687 produced in microfibre formats. The main examples are:

- 1688 • Cotton terry cloths / cotton rags: these are often repurposed cotton-based textiles that may
 1689 be preferentially used for heavy wiping, degreasing, and spill response, where lint is
 1690 acceptable. These are cheaper and more sacrificially used cloths for limited purposes.
- 1691 • Woven synthetic “wipers” (non-microfibre): these may be made of polyester, polypropylene,
 1692 viscose blends; sometimes “shop towel” style. Highly durable options of these types of
 1693 cloths might be suitable in cases of cleaning of areas with high grease/oil content.

- 1694
- 1695
- 1696
- 1697
- Glass and polishing cloths: used for cleaning glass windows, mirrors, chrome and other high-gloss surfaces. Microfibre options might exist here too, but normally these consist of linen/cotton blends or chamois-style synthetics. They have a special weave and/or finish which delivers a low streak, low lint finish.

1698 In terms of the text in the criterion proposal, the wording has been altered to be more specifically
1699 focused (e.g. cloths and mopheads instead of “textile cleaning accessories”) and the scope of
1700 accounting has been more clearly defined for cloths. Namely what “non-microfibre” products are
1701 also to be counted. Notes have also been added to distinguish between any cloths or mopheads
1702 used in cleaning machines (out of scope). A definition for the term “microfibre” is provided in the
1703 definitions section in case of doubts in any conversations with suppliers.

1704 It has also been clarified that the % accounting should be in terms of units purchased. This
1705 approach assumes a relatively standard unit quantity amongst different cloth types.

1706 The minimum share for mopheads is set higher due to the added co-benefits that come with
1707 microfibre mopheads when compared to microfibre cloths. Namely improved worker ergonomics,
1708 and quicker floor drying (better productivity and less inconvenience for client).

1709 The requirement in the proposed criterion to flag whether or not the products carry an ISO 14024
1710 Type I ecolabel could seem not directly relevant to its intended scope. However, While not required
1711 to demonstrate compliance with PC3 (m), it does form the basis for two optional criteria, one about
1712 higher shares of microfibre-based products (PC5(o)), and one about ecolabelled products (PC6(o)).
1713 These interconnections aim to help reduce the overall administrative burden of applying for the EU
1714 Ecolabel and to streamline the information to be complied.

1715

1716 Points for discussion 15 – PC3(m): Minimum use of microfibre-based cloths and mop heads for
1717 manual cleaning

1718 Stakeholders are invited to reply to the following consultation question/s:

1719 — Question 38 (Q38) - Does this criterion seem relevant to you? Should it be removed? Please, justify
1720 your answer.

1721 — Question 39 (Q39) –Do you think there should be a requirement on microfibre collection filters on the
1722 outlet of washing machines at applicant premises? Do you have any other remark about microfibre-
1723 based cloths? Please, justify your answer.

1724 — Question 40 (Q40) – Do you think there should be any clear restrictions on the use of disposable cloths
1725 and wet wipes? If so, how could these restrictions be nuanced? Please, justify your answer.

1726 — Question 41 (Q41) - Please, provide any other comments that you deem relevant to any aspect of PC3
1727 criterion.

1728

1729 PC4(o): High use of microfibre-based cloths and mopheads (up to 3 points) for
 1730 manual cleaning

Existing criterion from Commission Decision (EU) 2018/680: Criterion O3: High use of microfibre products (up to 3 points)															
<p>Only non-disposable textile cleaning accessories that are directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.</p> <p>The applicant shall earn points based on the percentage of the textile cleaning accessories (e.g. cloths, mop heads) used per year that are made of microfibre, as follows:</p> <ul style="list-style-type: none"> - At least 65 %: 1 point - At least 75 %: 2 points - At least 95 %: 3 points <p><i>Assessment and verification</i></p> <p><i>The applicant shall provide annual data (type and quantities of products) and documentation (including relevant invoices or site inventories) indicating the textile cleaning accessories used and specifying which textile cleaning accessories are made of microfibre.</i></p>															
Proposed criterion for TR1: Criterion M2:PC4(o): High use of microfibre-based cloths and mopheads products for manual cleaning (up to 3 points)															
<p><i>Note 1: this optional requirement is complementary to PC3(m) and uses the same scope, records and result generated for demonstrating compliance with that criterion.</i></p> <p><i>Note 2: only non-disposable cloths and mopheads directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.</i></p> <p>A maximum of up to 3 points can be awarded under this criterion based on the shares of purchased cloths and mop heads that are microfibre-based and are washable and reusable.</p> <table border="1"> <thead> <tr> <th>Product category</th> <th>Minimum share Tier 1</th> <th>Minimum share Tier 2</th> <th>Minimum share Tier 3</th> </tr> </thead> <tbody> <tr> <td>Cloths</td> <td>65 % (0.5 points)</td> <td>75 % (1 point)</td> <td>95 % (1.5 points)</td> </tr> <tr> <td>Mopheads for indoor floor cleaning</td> <td>80 % (0.5 points)</td> <td>90 % (1 point)</td> <td>100 % (1.5 points)</td> </tr> </tbody> </table> <p><i>Assessment and verification</i></p> <p><i>In cases where points are being claimed under this optional criterion, the applicant shall refer to the same purchasing record and inventory submitted as part of demonstrating compliance with the mandatory minimum shares of relevant cleaning accessories (see PM3(m)).</i></p>				Product category	Minimum share Tier 1	Minimum share Tier 2	Minimum share Tier 3	Cloths	65 % (0.5 points)	75 % (1 point)	95 % (1.5 points)	Mopheads for indoor floor cleaning	80 % (0.5 points)	90 % (1 point)	100 % (1.5 points)
Product category	Minimum share Tier 1	Minimum share Tier 2	Minimum share Tier 3												
Cloths	65 % (0.5 points)	75 % (1 point)	95 % (1.5 points)												
Mopheads for indoor floor cleaning	80 % (0.5 points)	90 % (1 point)	100 % (1.5 points)												

The purchasing schedule and inventory shall be updated annually and shall be provided upon request by the competent body in order to help demonstrate ongoing compliance with the overall minimum points requirement for the licenced service provider.

1731 Rationale for the proposed PC4(o) criterion (formerly O3)

1732 This optional criterion incentivises service providers to further increase their use of washable and
1733 reusable microfibre cloths and mop heads beyond the mandatory minimum. By awarding additional
1734 points for higher shares of microfibre-based products, the criterion encourages best practices in
1735 resource efficiency and waste reduction. Microfibre products are known for their cleaning
1736 effectiveness and durability, which can significantly reduce the consumption of chemicals and water
1737 during manual cleaning.

1738 Summary of changes

- 1739 • Change on criterion title
- 1740 • Linked to PC3, the proposed criterion distinguishes between cloths and mopheads, setting
1741 separate minimum share thresholds for each
- 1742 • The proposed criterion raises the minimum share thresholds for mop heads (80%, 90%,
1743 100%) compared to cloths (65%, 75%, 95%), while the previous criterion used the same
1744 thresholds for all accessories (65%, 75%, 95%).
- 1745 • Only microfibre-based cloths and mop heads that are washable and reusable count toward
1746 the thresholds, adding a new requirement not specified in the previous criterion.
- 1747 • Applicants must use the same purchasing records and inventory as for the mandatory
1748 minimum share criterion, with annual updates required for ongoing compliance; previously,
1749 verification focused on annual data and documentation of microfibre content.

1750 Stakeholder feedback on O3 (now PC4(o))

1751 Key takeaways about the optional higher shares of “textile cleaning accessories” to be made of
1752 microfibre that are used by the EU Ecolabel indoor cleaning service provider from the preliminary
1753 stakeholder survey are:

- 1754 • 79% recommended keeping O3 optional as-is; 16% suggested minor updates; 4% major
1755 updates; 2% suggested making it mandatory.
- 1756 • Among those asked about difficulty, a large majority reported no difficulty (83%); 8%
1757 reported difficulties and 8% had no opinion.
- 1758 • Key takeaways: follow-up comments emphasised the need for measures that reduce
1759 microplastics release and/or promote alternatives; some also suggested shifting points
1760 between O3 and O4 to better incentivise certified textiles/accessories.

1761 Comparison of existing ecolabels

1762 A comparison with other relevant ecolabel criteria on microfibre cleaning accessories is provided
1763 below, together with references to relevant criteria in those ecolabels.

1764 Table 15. Microfibre cleaning accessories comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O3 Points for higher shares of “textile cleaning accessories” made of microfibre presented in three tiers.	No direct microfibre % scoring. Related: P5 points for recycling/reuse of cloths/mops; broader consumption control in O5.	Related: 2.3.2 encourages microfibre technology whenever appropriate; no % scoring.	Related: microfibre cited as a method to reduce chemical use (5.4(g)); no % scoring.

1765 *Source: Own elaboration*

1766 As with the existing criterion M3 (now PC3(m)), the EU Ecolabel uniquely uses quantified microfibre
 1767 shares for scoring. Other ecolabels refer more generally to practice-based requirements.

1768 General comments

1769 Considering the stakeholder feedback and the comments already presented above in the rationale
 1770 section for PC3(m), it is considered appropriate to maintain this optional criterion, but the wording
 1771 here in the corresponding optional part needed to be adjusted to align with the proposed updates to
 1772 PC3(m).

1773

1774 Points for discussion 16 – PC4(o): High use of microfibre-based cloths and mopheads (up to 3
 1775 points) for manual cleaning

1776 Stakeholders are invited to reply to the following consultation question/s:

1777 — Question 42 (Q42) - Does this criterion seem relevant to you? Should it be removed or moved to
 1778 mandatory? Please, justify your answer.

1779 — Question 43 (Q43) - Please, provide any other comments that you deem relevant to any aspect of PC4
 1780 criterion.

1781

1782 PC5(o): Use of ecolabelled cleaning accessories (up to 5 points)

Existing criterion from Commission Decision (EU) 2018/680:

Criterion O4: Use of cleaning accessories with low environmental impact (up to 4 points)

Only cleaning accessories directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.

O4 (a) Mops (up to 2 points)

The applicant shall earn points based on the percentage of mops used per year that have been awarded the EU Ecolabel for Textiles or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States, as follows:

- At least 20 %: 1 point
- At least 50 %: 2 points

O4 (b) Cloths (up to 2 points)

The applicant shall earn points based on the percentage of cloths used per year that have been awarded the EU Ecolabel for Textiles or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States, as follows:

- At least 20 %: 1 point
- At least 50 %: 2 points

Assessment and verification

The applicant shall provide annual data (type and quantities of products) and documentation (including relevant invoices or site inventories) indicating the cleaning supplies and accessories used in the EU Ecolabel indoor cleaning service contracts.

Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate and/or packaging label showing that it was awarded in accordance with Commission Decision 2014/350/EU ⁽⁶²⁾. Where other ISO type I label products are used, the applicant shall provide a copy of the type I label certificate and/or packaging label.

Proposed criterion for TR1:

~~Criterion O4:PC5(o): Use of cleaning accessories with low environmental impact ecolabelled cleaning accessories (up to 3 points)~~

Note 1: the parts relating to cloths and mopheads in this optional requirement are complementary to PC3(m) and use the same scope and records as used for demonstrating compliance with that criterion. The

⁶² Commission Decision 2014/350/EU of 5 June 2014 establishing the ecological criteria for the award of the EU Ecolabel for textile products (OJ L 174, 13.6.2014, p. 45).

calculation is different in terms of which parts of the inventory are counted and which are not, but all relevant flags for counting are in the same inventory for these products.

Note 2: only products directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.

A maximum of up to 3 points can be awarded under this criterion based on the shares of each of the purchased product categories listed in the table below that carry an ISO 14024 Type I ecolabel.

Product category	Minimum share Tier 1	Minimum share Tier 2
Cloths (including microfibre cloths, cotton terry cloths, woven synthetic wipers, nonwoven disposable wipes, and glass/polishing cloths)	20 % (0.5 points)	50 % (1 point)
Mopheads for indoor floor cleaning	20 % (0.5 points)	50 % (1 point)
Bin liners	20 % (0.5 points)	50 % (1 point)

Assessment and verification

In cases where points are being claimed under this optional criterion for cloths or mophead for indoor floor cleaning, the applicant shall refer to the same purchasing record and inventory submitted as part of demonstrating compliance with the mandatory minimum shares of relevant cleaning accessories (see PC3(m)). A separate accounting of the entries that are covered by ISO Type I ecolabels shall be indicated, together with the name of the applicable ecolabel scheme.

In cases where points are being claimed under this optional criterion for bin liners, the applicant shall provide a declaration of compliance with this criterion, indicating the % share of bin liners that are ecolabelled. This claim shall be supported by a separate purchasing record and inventory for bin liners. The name of the applicable ecolabel scheme shall be indicated next to each counted purchase record.

The purchasing schedule and inventory shall be updated annually and shall be provided upon request by the competent body in order to help demonstrate ongoing compliance with the overall minimum points requirement for the licenced service provider.

1783 Rationale for the proposed PC5(o) criterion (formerly O4)

1784 This optional criterion encourages service providers to increase their use of cleaning accessories
 1785 that carry ISO 14024 Type I ecolabels, which are recognised for their low environmental impact. By
 1786 awarding points for higher shares of ecolabelled cloths, mopheads, and bin liners, the criterion
 1787 promotes the selection of products that meet rigorous environmental standards, supporting
 1788 reductions in resource use, waste, and harmful substances. The tiered points system incentivises
 1789 improvement and generates a clear market signal to suppliers. Transparent purchasing records and
 1790 annual updates ensure accountability and ongoing compliance.

1791 Summary of changes

- 1792
- The new criterion expands the eligible product categories from just mopheads and cloths to also include bin liners.
- 1793
- The minimum share thresholds for earning points (20% and 50%) remain the same, but now apply to each product category individually, with a more granular points allocation.
- 1794
- 1795

- 1796 • The scope for cloths and mop heads is clarified and aligned with the definitions and records
 1797 used in the related mandatory criterion (PC3(m)), and the same calculation method can be
 1798 used.

1799 Stakeholder feedback on O4 (now PC5(o))

1800 Key takeaways about the optional shares of low environmental impact “cleaning accessories” used
 1801 by the EU Ecolabel indoor cleaning service provider from the preliminary stakeholder survey are:

- 1802 • 72% recommended keeping O4 optional as-is; 18% suggested minor updates; 10% major
 1803 updates; 0% suggested making it mandatory or removing it.
- 1804 • Among those asked about difficulty, 38% reported no difficulty, 25% reported difficulties,
 1805 and 38% had no opinion.
- 1806 • stakeholders reported mixed market availability; some found thresholds easy to reach while
 1807 others reported limited supply and/or higher cost (and one respondent claimed no relevant
 1808 ecolabelled textiles were available). Suggested revisions included raising percentage
 1809 thresholds (e.g., from 20%/50% to higher levels), promoting certified textiles, and clarifying
 1810 evidence requirements.

1811 Comparison of existing ecolabels

1812 A comparison with other relevant ecolabel criteria on ecolabelled cleaning accessories is provided
 1813 below, together with references to relevant criteria in those ecolabels.

1814 Table 16. Use of ecolabelled cleaning accessories comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O4 Points for minimum shares of ISO Type I ecolabelled “cleaning accessories”, namely mops and cloths, presented in two tiers.	Close match: P5 awards points for 50–100% of cloths and mops used at customers being ecolabelled (Nordic Swan or EU Ecolabel).	No direct requirement for ecolabelled mops/cloths. Related: emphasis on reusable/microfiber cloths (2.3.2) and waste minimisation.	No direct ecolabel requirement for mops/cloths. Related: preference for reusable/recyclable/recycled-content tools (5.3(e)) and tracking consumables (5.3(d)).

1815 *Source: Own elaboration*

1816 The EU Ecolabel and Nordic Swan criteria explicitly incentivise ecolabelled textiles, whereas Green
 1817 Seal and NZ focus more on reuse/microfiber and general procurement preferences.

1818 General comments

1819 The title of the criterion has been changed from “low environmental impact” to “ecolabelled”
 1820 cleaning accessories. This avoids any debate about whether products with a minimum share of
 1821 recycled plastic should be included or not. While recycled content can contribute to reducing
 1822 environmental impact, recycled content claims need to be verified by third parties and have their
 1823 own underlying information requirements. By referring directly to ecolabels, the approach is more
 1824 standardised and transparent, as ecolabels already encompass a broad range of environmental
 1825 criteria including, in many cases, the use of recycled materials within their certification schemes.
 1826 Ecolabels are also directly visible on any product packaging and should be traceable to catalogues

1827 and records kept by the awarding bodies. Therefore, the emphasis on ecolabelled products ensures
1828 that “low environmental impact” is achieved in a holistic and verifiable manner.

1829 A clear synergy between the mandatory and optional requirements on shares of microfibre-based
1830 cloths and mop heads is continued here. The underlying data to be compiled is basically the same.

1831 The advantage of this requirement is that:

- 1832 • it permits a double recognition of microfibre cloths and mop heads that are also
1833 ecolabelled. Ecolabel requirements will bring additional benefits such as hazardous
1834 substance restrictions and minimum quality requirements.
- 1835 • It permits the recognition of other cloths that are not microfibre-based, but which may
1836 have good environmental performance, as reflected by their carrying an ISO Type I
1837 ecolabel.

1838 We also propose to potentially extend the requirement to other cleaning accessories such as mop
1839 handles, brooms, dust pans, bin liners, buckets and gloves in order to encourage demand for these
1840 types of ecolabelled products. These products are synonymous with indoor cleaning services in a
1841 similar manner as cloths and mopheads.

1842

1843 Points for discussion 17 – PC5(o): Use of ecolabelled cleaning accessories (up to 5 points)

1844 Stakeholders are invited to reply to the following consultation question/s:

- 1845 — Question 44 (Q44) - Does this criterion seem relevant to you? Should it be removed or moved to
1846 mandatory? Please, justify your answer.
- 1847 — Question 45 (Q45) – Which ISO Type I ecolabels that you are aware of have cloths or mopheads within
1848 their scope? If known, please specify the product group name and any links.
- 1849 — Question 46 (Q46) – Which other ecolabelled cleaning accessories might be relevant to mention in this
1850 criterion (See Table)? (some possibilities could be: mop handles, broom handles, buckets, dust pans,
1851 broom heads and gloves). Please, justify your response and specify the product group name and any
1852 links.
- 1853 — Question 47 (Q47) - Please, provide any other comments that you deem relevant to any aspect of PC5
1854 criterion.

1855

1856 PC6(o): Ecolabelled products for exclusive use at applicant premises (up to 3
 1857 points)

Existing criterion from Commission Decision (EU) 2018/680:

Criterion O11: Ecolabelled services and other ecolabelled products (up to 5 points)

This criterion applies to the use of ecolabelled services and/or products, defined as services and/or products that are not directly used in the provision of EU Ecolabel indoor cleaning services but are used to support the everyday business operations of the applicant that refer to the EU Ecolabel indoor cleaning services provided. These can include, but are not limited to, services (e.g. laundry and car washing) outsourced by the applicant to a third party. They can cover products such as laundry detergents, dishwasher detergents or copying paper.

O11 (a) Ecolabelled services (up to 2 points)

100% of a service type is outsourced to a provider that has been awarded the EU Ecolabel or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States for that service (1 point for each service, up to a maximum of 2 points in total)

O11 (b) Ecolabelled products (up to 3 points)

100% of product units of a product group have been awarded the EU Ecolabel or other EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States (0,5 point for each product group, up to a maximum of 3 points total)

Note: Ecolabelled products as cloths and mops, and consumable goods supplied as part of contract to clients fall outside the scope of this criterion. For this sub-criterion, a "product group" is considered to be as defined by EU Ecolabel criteria or other ISO type I label criteria (e.g. "paper products", "laundry detergents", "textiles").

Assessment and verification:

O11(a) The applicant shall provide appropriate evidence of an ISO type I label certification held by the outsourced service(s), along with the relevant invoices.

O11(b) The applicant shall provide data and documentation (including relevant invoices) indicating the quantities of such products used and a copy of the relevant EU Ecolabel or ISO type I label certificates and/or packaging labels.

Proposed criterion for TR1:

Criterion O4:PC6(o): Ecolabelled services and other ecolabelled products for exclusive use at applicant premises (up to 35 points)

A maximum of up to 3 points can be awarded under this criterion based on the shares of each of the purchased product categories listed in the table below that carry an ISO 14024 Type I ecolabel.

Product category	Minimum share Tier 1	Minimum share Tier 2
Toilet paper	n/a	100% (1 point)
Kitchen roll	50% (0.5 points)	90% (1 point)
Laundry detergent	50% (0.5 points)	90% (1 point)
Hand soap	50% (0.5 points)	90% (1 point)

Assessment and verification

In cases where points are being claimed under this optional criterion for any of the product groups listed in the table above, the applicant shall provide a declaration of compliance, indicating the results for each relevant product group where points are claimed. This claim shall be supported by a separate purchasing record and inventory for each of the relevant product groups (with each entry flagged as "Ecolabelled" or not. The name of the applicable ecolabel scheme shall be indicated next to each counted purchase record. In cases where the same products are also used at client sites, the purchased quantities designated for exclusive in-house use at the applicant's premises must be subtracted from the bulk quantities used for service provision calculations, and used in a separate calculation for this criterion.

The purchasing schedule and inventory shall be updated annually and shall be provided upon request by the competent body in order to help demonstrate ongoing compliance with the overall minimum points requirement for the licenced service provider.

1858 Rationale for the proposed PC6(o) criterion (formerly O11)

1859 This optional criterion extends the commitment to environmental responsibility beyond client sites
1860 to the applicant's own premises. By awarding points for the exclusive use of ISO 14024 Type I
1861 ecolabelled products such as toilet paper, kitchen roll, laundry detergent, and hand soap at their
1862 own facilities, service providers demonstrate a holistic approach to sustainability. This not only
1863 reduces the environmental impact of their internal operations but also reinforces the credibility and
1864 integrity of the EU Ecolabel. The requirement for detailed purchasing records and annual updates
1865 ensures transparency and ongoing compliance, encouraging continuous improvement and
1866 leadership in sustainable procurement practices throughout the organisation.

1867 Summary of changes

- 1868 • The new criterion applies only to ecolabelled products, removing ecolabelled services from
1869 the scope.
- 1870 • Points are now awarded based on specific product categories (graphic paper, toilet paper,
1871 kitchen roll, laundry detergent, hand soap) with defined minimum share thresholds for each,
1872 rather than for ANY product group.
- 1873 • The new criterion sets minimum share thresholds for awarding points, whereas previously
1874 100% of a product group or service was required for points.
- 1875 • Products used at client sites must be excluded from the calculation, and only quantities
1876 designated for exclusive in-house use are counted, clarifying the distinction between service
1877 provision and internal use.
- 1878 • Verification now requires separate purchasing records and inventories for each product
1879 group, with entries flagged as ecolabelled and the applicable ecolabel scheme indicated,
1880 and annual updates for ongoing compliance; previously, verification relied on invoices and
1881 certificates for outsourced services and product groups.

1882

1883

1884 Stakeholder feedback on O11 (now PC6(o))

1885 Key takeaways about a) the optional contracting of ecolabelled services by the EU Ecolabel
 1886 applicant, and b) the use of other ecolabel products by the applicant from the preliminary
 1887 stakeholder survey are:

- 1888 • 68% recommended keeping O11 optional as-is; 12% suggested minor updates; 14% major
 1889 updates; 4% suggested making it mandatory; 2% suggested removal.
- 1890 • Among those asked about difficulty, 39% reported difficulties, 33% reported no difficulty,
 1891 and 28% had no opinion.
- 1892 • difficulties were often linked to limited availability of ecolabelled services (especially for
 1893 O11(a)) and ambiguity on how to apply the criterion across multiple product groups or
 1894 partial ecolabel coverage. Respondents suggested allowing other credible eco-certifications
 1895 in some categories, clarifying applicability (including client-requested services), and
 1896 improving the annual data sheet to reduce administrative burden.

1897 Comparison of existing ecolabels:

1898 A comparison with other relevant ecolabel criteria on the contracting of ecolabelled services and
 1899 purchasing other ecolabel products are provided in the table below, together with references to
 1900 relevant criteria in those ecolabels.

1901 Table 17. Contracting of ecolabelled services and purchasing other ecolabel products comparison of existing
 1902 ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O11(a) 1 point per ecolabel service (up to 2 points) and (b) 0.5 points per ecolabel product (100% share for those products) (up to a maximum of 3 points). No fixed services or products defined, but are not to be used for clients and not including mops and cloths.	Strong match: P5 awards points for a wide range of ecolabelled products/services (e.g. external laundries, car washes, hand soap, towel rolls, workwear, dishwashing detergents, plastic bags, printing). O16 mandates ecolabelled tissue and copy paper when responsible for purchase.	Partial overlap: 4.1 requires environmentally preferable hand soap and paper products (and other product categories), but does not score ecolabelled 'supporting services' (e.g. laundries).	Partial overlap: 5.3(b) requires ECA-licensed sanitary paper products, soaps/toiletries and cleaning chemicals; 5.3(a) procurement policy includes products/services; no points scheme.

1903 *Source: Own elaboration*

1904 The EU Ecolabel and Nordic Swan explicitly incentivise broader 'supporting' ecolabelled
 1905 products/services beyond core cleaning chemicals. Green Seal and NZ include many of these via
 1906 purchasing requirements but not as a separate scored category.

1907 General comments

1908 The title of the criterion has been changed from "Ecolabelled services and other ecolabelled
 1909 products" to "Ecolabelled products for exclusive use at applicant premises". The main reasons for
 1910 this are:

- 1911 • To accurately reflect the fact that ecolabelled services are no longer addressed in this
1912 criterion.
- 1913 • To explain directly in the title the distinction about where these products are to be used.
- 1914 The existing criterion was open-ended in the sense that any ecolabel service or product could
1915 potentially be counted. It is open to interpretation what “used to support the everyday business
1916 operations of the applicant that refer to the EU Ecolabel indoor cleaning services provided” actually
1917 means.
- 1918 The TR1 proposal clearly limits the approach to specific products that could be expected to be used
1919 in significant quantities in the day-to-day running of the premises of an indoor cleaning service
1920 provider.
- 1921 Finally, the option for claiming points for ecolabelled services has been removed. By far the most
1922 relevant service would be professional laundry of uniforms and washable, textile-based cleaning
1923 accessories. An approach to ecolabel laundry services is maintained in the proposals for TR1, but
1924 has been moved to the theme on energy and grouped with requirements on washing machines at
1925 the applicant premises.

1926

1927 Points for discussion 18 – PC6(o): Ecolabelled products for exclusive use at applicant premises
1928 (up to 3 points)

1929 Stakeholders are invited to reply to the following consultation question/s:

1930 — Question 48 (Q48) - Does this criterion seem relevant to you? Should it be removed? Please, justify
1931 your answer.

1932 — Question 49 (Q49) - Do you consider this criterion to be burdensome for your organisation in terms of
1933 time, resources, administrative effort or other? Please specify which aspects, if any, would be
1934 particularly challenging for your business.

1935 — Question 50 (Q50) - Please, provide any other comments that you deem relevant to any aspect of *PC6*
1936 criterion.

1937

1938 PC7(o): Ecolabelled consumables supplied to the client (up to 3 points)

Existing criterion from Commission Decision (EU) 2018/680:

Criterion O12: Consumable goods and electric hand air-dryers supplied to the client (up to 3 points)

This criterion only applies if the applicant is responsible for supplying consumable goods to be used at the cleaning sites in at least one contract for EU Ecolabel cleaning services. Only consumable goods and electric hand dryers supplied as part of these contracts are covered by this criterion:

O12 (a) Hand Soaps (1 point)

At least 70% of hand soaps, by volume of hand soaps supplied per year, shall have been awarded the EU Ecolabel for rinse-off cosmetics in accordance with Commission Decision 2014/893/EU13, or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States.

O12 (b) Paper goods (1 point)

At least 90% of consumable paper goods (personal hygiene and absorbent paper), by weight or volume supplied per year, as appropriate, shall have been awarded the EU Ecolabel for tissue paper in accordance with Commission Decision 2009/568/EC14, or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States.

O12 (c) Textile towel rolls (1 point)

At least 50% of textile towel rolls, by number of rolls supplied per year, shall have been awarded the EU Ecolabel for textile products in accordance with Commission Decision 2014/350/EU or another EN ISO 14024 type I ecolabel for textile products or fabric towels supplied in towel dispensers that is nationally or regionally officially recognised in the Member States.

O12 (d) Electric hand dryers (1 point)

All electric hand dryers supplied and maintained by the applicant shall have proximity sensors or have been awarded an EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States.

Assessment and verification:

The applicant shall indicate for each EU Ecolabel services contract whether or not they include the provision of consumable goods, annual data (commercial name and weight, volume or number of pieces) and documentation (including relevant invoices or site inventories) indicating the consumable goods supplied. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate and/or packaging label showing that it was awarded, as the case may be, in accordance with:

- *Decision 2014/893/EU;*
- *Decision 2009/568/EC;*
- *Decision 2014/350/EU.*

Where other ISO type I label products are used, the applicant shall provide a copy of the type I label certificate and/or packaging label.

For electric hand dryers, the applicant shall provide documentation demonstrating how the requirements are fulfilled (e.g. packaging label or technical information showing the presence of an ISO type I label certificate or proximity sensors).

Proposed criterion for TR1:

~~Criterion O12:PC7(o): Ecolabelled consumables goods and electric hand air dryers supplied to the client (up to 3 points)~~

This criterion only applies if the applicant is responsible for supplying consumable goods to be used at the cleaning sites in at least one contract for EU Ecolabel cleaning services. Only consumable goods ~~and electric hand dryers~~ supplied as part of these contracts are covered by this criterion:

O12 (a) Hand Soaps (1 point)

At least 70% of liquid hand soaps, (by volume) ~~of hand soaps~~ supplied per year, shall have been awarded ~~a recognised the EU Ecolabel for rinse-off cosmetics in accordance with Commission Decision 2014/893/EU13, or another~~ EN ISO 14024 type I ecolabel ~~that is nationally or regionally officially recognised in the Member States.~~

O12 (b) Paper towels and toilet paper ~~goods~~ (1 point)

At least 90% of paper towels or toilet paper ~~consumable paper goods (personal hygiene and absorbent paper)~~, by weight or volume supplied per year, as appropriate, shall have been awarded ~~the EU Ecolabel for tissue paper in accordance with Commission Decision 2009/568/EC14, or a recognised~~ another EN ISO 14024 type I ecolabel ~~that is nationally or regionally officially recognised in the Member States.~~

O12 (c) Textile towel rolls (1 point)

At least 50% of textile towel rolls ~~supplied for hand drying in toilets~~, by number of rolls supplied per year, shall have been awarded ~~a recognised the EU Ecolabel for textile products in accordance with Commission Decision 2014/350/EU or another~~ EN ISO 14024 type I ecolabel for textile products or fabric towels ~~supplied in towel dispensers that is nationally or regionally officially recognised in the Member States.~~

~~O12 (d) Electric hand dryers (1 point)~~

~~All electric hand dryers supplied and maintained by the applicant shall have proximity sensors or have been awarded an EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States.~~

Assessment and verification:

In cases where points are being claimed under this optional criterion for any of the product groups listed above, the applicant shall provide a declaration of compliance, indicating the results for each relevant product group where points are claimed. This claim shall be supported by a list of all relevant service contracts and associated purchasing records and site inventory for each of the

relevant product types listed above. Each inventory item shall be flagged to inform whether or not it carries a valid ISO 14024 Type I ecolabel.

The purchasing schedule and inventory shall be updated annually and shall be provided upon request by the competent body in order to help demonstrate ongoing compliance with the overall minimum points requirement for the licenced service provider

~~The applicant shall indicate for each EU Ecolabel services contract whether or not they include the provision of consumable goods, annual data (commercial name and weight, volume or number of pieces) and documentation (including relevant invoices or site inventories) indicating the consumable goods supplied. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate and/or packaging label showing that it was awarded, as the case may be, in accordance with:~~

~~— Decision 2014/893/EU;~~

~~— Decision 2009/568/EC;~~

~~— Decision 2014/350/EU.~~

Where other ISO type I label products are used, the applicant shall provide a copy of the type I label certificate and/or packaging label.

~~For electric hand dryers, the applicant shall provide documentation demonstrating how the requirements are fulfilled (e.g. packaging label or technical information showing the presence of an ISO type I label certificate or proximity sensors).~~

1939 Rationale for the proposed PC7(o) criterion (formerly O12)

1940 This optional criterion is important because it ensures that consumable goods supplied to clients
1941 meet recognised environmental standards. By requiring high minimum shares of ISO 14024 Type I
1942 ecolabelled products, the criterion promotes the use of more sustainable, lower-impact
1943 consumables at client sites, directly supporting resource efficiency and waste reduction.

1944 Summary of changes

1945 • Product categories and thresholds are mostly unchanged, but references to specific
1946 Commission Decisions for EU Ecolabel criteria have been removed, with only general
1947 reference to EN ISO 14024 type I ecolabels used instead.

1948 • The electric hand dryer option has been removed, it is not a consumable or temporary
1949 service that would normally be part of an indoor cleaning service.

1950 • Verification requirements are more detailed.

1951 Stakeholder feedback on O12 (now PC7(o))

1952 Key takeaways about the optional procurement and use of ecolabelled products in supplied
1953 consumables that are required as part of the service contracts with clients from the preliminary
1954 stakeholder survey are:

1955 • 67% recommended keeping O12 optional as-is; 19% suggested minor updates; 7% major
1956 updates; 4% suggested making it mandatory; 4% suggested removal.

- 1957 • Among those asked about difficulty, 53% reported no difficulty, 26% reported difficulties,
1958 and 21% had no opinion.
- 1959 • market availability was reported as mixed across sub-items—soaps and paper goods often
1960 seen as easier, while ecolabelled textile towel rolls and dryers were reported as scarce in
1961 some contexts. Respondents flagged administrative burden in tracking percentages,
1962 suggested allowing other certifications (e.g., in cosmetics), and requested
1963 clarifications/adjustments (e.g., energy efficiency criteria for dryers, revisiting the proximity
1964 sensor requirement, and revising required percentages).

1965 Comparison of existing ecolabels

1966 A comparison with other relevant ecolabel criteria on the use of ecolabel consumables for direct
1967 client use are provided in the table below, together with references to relevant criteria in those
1968 ecolabels.

1969 Table 18. Ecolabel consumables comparison of existing ecolabels criteria

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O12(a) 1 point per ecolabel product (up to 3 points) for defined minimum shares for (a) hand soaps; (b) paper goods (c) textile towel rolls; (d) electric hand dryers.	Partial match: O16 (tissue paper) and P5 (hand soap, cloth hand towel rolls, plastic bags, etc.) cover many consumables; no parallel requirement for electric hand dryers.	Partial match: 4.1 includes hand soap and paper products (tissue/paper towels/napkins); no hand-dryer requirement.	Partial match: 5.3(b) covers sanitary paper products, soaps and toiletries supplied as part of service; no hand-dryer requirement.

1970 *Source: Own elaboration*

1971 The EU Ecolabel is the only one here explicitly including electric hand dryers in the scoring. The other
1972 schemes focus mainly on consumables (paper, soap, textiles) rather than client-installed equipment.

1973 General comments

1974 The removal of electric hand dryers from the scope seems well justified due to: (a) irrelevance to
1975 the subject matter of the provision of indoor cleaning services; (b) the lack of competency and
1976 control of service providers themselves regarding these products; and (c) it is not a “consumable” as
1977 such, but rather a durable appliance that is wired into the electricity network and bolted onto the
1978 wall in client buildings.

1979 The other main changes proposed relate to simplifications of the legal text and alignment with
1980 similar text constructions in other criteria proposals like PC5(o). References to specific legal texts (as
1981 for example, Commission Decisions containing the EU Ecolabel criteria) have been removed as an
1982 strategy to avoid situations where they become obsolete over time. Instead, it is proposed to keep
1983 an up-to-date list of relevant ISO Type I ecolabels and their criteria for different product groups that
1984 are specified within the EU Ecolabel ICS criteria in its associated User Manual.

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Points for discussion 19 – PC7(o): Ecolabelled consumables supplied to the client (up to 3 points)

Stakeholders are invited to reply to the following consultation question/s:

— Question 51 (Q51) - Does this criterion seem relevant to you? Should it be removed ? Please, justify your answer.

— Question 52 (Q52) - Please, provide any other comments that you deem relevant to any aspect of *PC7* criterion.

1994 PC8(o): Use of undiluted cleaning products (up to 3 points)

Existing criterion from Commission Decision (EU) 2018/680:

Criterion O2: Use of concentrated undiluted cleaning products (up to 3 points)

Only products directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.

The applicant shall earn points based on the percentage by volume at purchase of all cleaning products used per year, excluding wet wipes, other pre-moistened products and products used for the impregnation and conservation of mops (during the laundry process), that have a minimum dilution rate of 1:100, as follows:

- At least 15 %: 1 point
- At least 30 %: 2 points
- At least 50 %: 3 points

Assessment and verification

The applicant shall provide annual data (commercial name and volume of products) and documentation (including relevant invoices or site inventories) indicating the cleaning products used. For each product, documentation on the dilution rate used shall be provided (safety data sheets, user instructions or other relevant means). If a product can be used at multiple dilution rates, the most commonly used dilution rate, as justified by internal staff instructions, shall be provided. For ready-to-use products the dilution rate shall be marked as one.

Proposed criterion for TR1:

Criterion O2PC8(o): Use of ~~concentrated~~ undiluted-cleaning products (up to 3 points)

Note: Only products directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion.

The applicant shall earn points based on the percentage by volume at purchase of all liquid undiluted hard surface cleaning products used per year, ~~excluding wet wipes, other pre-moistened products and products used for the impregnation and conservation of mops (during the laundry process), that have a minimum dilution rate of 1:100,~~ as follows:

- At least 15 %: 1 point
- At least 30 %: 2 points
- At least 50 %: 3 points

Percentage shares shall be determined based on an equivalent “ready to use volume” basis (1).

Assessment and verification

The applicant shall provide annual data (commercial name and volume of products) and documentation (including relevant invoices or site inventories) indicating the cleaning products used. For each product, documentation on the dilution rate used shall be provided (safety data sheets,

user instructions or other relevant means). If a product can be used at multiple dilution rates, the most commonly used dilution rate, as justified by internal staff instructions, shall be provided. ~~For ready to use products the dilution rate shall be marked as one.~~

The share of all liquid undiluted hard surface cleaning products used per year (UND_{share}) shall be calculated as:

$$UND_{share} (\%) = (UND_{year} / Total_{year}) \times 100$$

The total volume of products used per year ($Total_{year}$) shall be calculated as the sum of the total volume of products in ready to use form (RTU_{year}) plus the total volume of undiluted products converted to "ready to use volume" basis (UND_{year})⁽¹⁾.

(¹) The ready to use volume basis is a way to convert all liquid hard surface cleaning products into a common unit. Any liquid hard surface cleaning products supplied in ready to use form will simply be counted as the volume they are supplied in.

1995 Rationale for the proposed PC8(o) criterion (formerly O2)

1996 This optional criterion aims at priming the use of "undiluted" products, namely those products that
1997 required dilution prior to use. Due to its concentrated form, they offer comparatively with HSC
1998 products in ready to use form a set of environmental benefits (e.g. reduced transport emissions;
1999 less packaging used per cleaning dose).

2000 Summary of changes

- 2001 • The scope of the criterion is focused now on on hard surface cleaning (HSC) products in
2002 liquid form.
- 2003 • The criterion keeps promoting the use of products that need dilution before use, thus using
2004 the term "undiluted" instead of "concentrated".
- 2005 • The minimum dilution rate (1:100) is removed;
- 2006 • The way in which the shares (%) are to be calculated is defined and explained (i.e. *ready-to-*
2007 *use volume* basis).

2008 Stakeholder feedback on O2 (now PC8(o))

2009 Key takeaways about the optional procurement and use of concentrated products in supplied
2010 consumables that are required as part of the service contracts with clients from the preliminary
2011 stakeholder survey are:

- 2012 • 74% recommended keeping O2 optional as-is; 19% suggested minor updates; 4% major
2013 updates; 4% suggested making it mandatory; 0% suggested removal.
- 2014 • Among those asked about difficulty, views were evenly split: 33% reported difficulties, 33%
2015 reported no difficulty, and 33% had no opinion.
- 2016 • Key takeaways: respondents proposed higher thresholds for awarding points (including
2017 illustrative ranges such as 65%/75%/95% for 1/2/3 points), clearer accounting for
2018 powders/tablets, and clearer examples for interpreting the 1:100 dilution concept. Some
2019 suggested making O2 mandatory, particularly if concentrated products become standard
2020 under revised EU Ecolabel detergents criteria.

2021 Comparison of existing ecolabels

2022 A comparison with other relevant ecolabel criteria on the use of concentrated cleaning products are
 2023 provided in the table below, together with references to relevant criteria in those ecolabels.

2024 Table 19. Use of concentrated cleaning products comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O2: 1, 2 or 3 points when 15%, 30% or 50% of relevant products used are in concentrated form and need to be diluted at ratios of 1:100 or more.	No direct equivalent for a 1:100 dilution threshold. Related: O4 dosing and O5 consumption cap can incentivise concentrates/low-use products.	Related but not equivalent: concentrates handled via dilution control (2.7.1); definition of “concentrate” is typically at least 1:16; no 1:100 share requirement.	Related but not equivalent: dilution instructions and systems required (5.4(c)-(d)); no 1:100 minimum dilution-rate scoring.

2025 *Source: Own elaboration*

2026 The EU Ecolabel uniquely scores concentration/dilution at the rate of 1:100 or more. Other schemes
 2027 emphasize correct dilution and reducing overall consumption rather than rewarding very high
 2028 dilution ratios.

2029 General comments

2030 There was a lack of clarity about the scope in the existing criterion O2. Cleaning products are very
 2031 broad, and while some categories are explicitly excluded, it is not clear exactly what is included. For
 2032 this reason, the scope is now clearly limited to liquid hard surface cleaning products. This means
 2033 there is no need to explicitly exclude products such as wet wipes or additives for laundry cycles.

2034 There are already an incentives for cleaning service providers to use concentrated cleaning
 2035 products, for examplesimpler logistics and reduced storage space needed at both client and
 2036 applicant premises). Furthermore, the use of concentrated products brings other important
 2037 environmental advantages when considered on a function unit basis with ready to use equivalents,
 2038 such as:

- 2039 • Less packaging.
- 2040 • Less transport emissions.
- 2041 • Reduced or avoided need for in-can preservatives.

2042 These benefits are all linked to the reduced water content in concentrated liquid products. However,
 2043 there also risks of unintended higher environmental impacts due to overdosing of concentrated
 2044 products. Measures to prevent or minimise this are included in criterion GM2 on staff training, and
 2045 GM3 on access to cleaning product dosing equipment and instructions.

2046 On the “downside”, undiluted products may be less likely to carry ecolabels because they have
 2047 inherently higher levels of substances, some of which may be restricted. Also, there are a series of
 2048 aspects that could difficult setting proportionate but ambitious thresholds and their verification:

- 2049 • Depending on the exact scope, the criteria are very easy to meet or very difficult. For
 2050 example, dilution ratios of 1:100 or more are common for floor cleaners, but much rarer for

2051 other types of cleaning product (e.g. toilet gels, glass cleaners etc.). No specific dilution ratio
2052 is set at this stage, though it would be ideal to set this by relevant product category.

2053 • Setting % shares by volume (and not value) would be an inherent disadvantage for
2054 concentrated products because for a given job, far less concentrated product would need to
2055 be purchased than an equivalent ready-to-use product (100 times less) or products that use
2056 lower dilution rates. The JRC has proposed converting to equivalent “ready to use” units and
2057 has introduced explicitly how to perform the minimum shares calculations.

2058 • There is also room for interpretation when the same concentrated product can be diluted at
2059 different ratios, or even used neat, depending on the exact cleaning purpose. The JRC
2060 understand that the most common dilution is the one used for routine/ordinary cleaning but
2061 welcomes further insights.

2062 The JRC would like to hear stakeholders view on these regards via the dedicated question shared at
2063 the end of this section.

2064 As final note, the JRC proposes to add worked examples in the UM for clarity. The following is an
2065 example on how to extend information about the footnote about the concept and calculation of the
2066 “ready to use volume” basis.

2067 *“The ready to use volume basis is a way to convert all liquid hard surface cleaning products*
2068 *into a common unit. For example, 1 L of a concentrated product with a dilution rate of 1 in*
2069 *10 shall be considered as 10 L of ready to use product. 0.75 L of a concentrated product*
2070 *with a dilution rate of 1 in 16 shall be considered as 12 L of ready to use product. Any liquid*
2071 *hard surface cleaning products supplied in ready to use form will simply be counted as the*
2072 *volume they are supplied in.”*

2073

2074 Points for discussion 20 – PC8(o): Use of concentrated undiluted cleaning products (up to 3
2075 points)

2076 Stakeholders are invited to reply to the following consultation question/s:

2077 — Question 53 (Q53) - Do you think it should be included as a mandatory criterion? Please, justify your
2078 answer.

2079 — Question 54 (Q54) – Can you help us create a taxonomy of “hard surface cleaning products in liquid
2080 and undiluted form”? If so, please also provide suggestions for product categories and the associated
2081 dilution ratio in your response.

2082 — Question 55 (Q55) - Please, provide any other comments that you deem relevant to any aspect of PC8
2083 criterion.

2084

2085 5.3. Theme 3: Energy and climate

2086 All energy-related criteria from [Commission Decision \(EU\) 2018/680](#) ⁽⁶³⁾ (EC, 2018) have been
2087 grouped together into a common theme, titled “energy and climate”. As the title implies, this theme
2088 relates to the consumption of energy as part of the EU Ecolabel cleaning service.

2089 For the sake of practical assessment and verification, it relates to energy consumed at the applicant
2090 premises and by the vehicle fleet belonging to the applicant. This approach is a continuation of that
2091 already used in the 2018 criteria. The climate aspect has been added because of:

- 2092 • the relationship between energy consumption and greenhouse gas emissions,
- 2093 • the fact that a shift to electric or hybrid vehicles is a shift away from fossil fuels,
- 2094 • to reflect a new criterion related to the sourcing of renewable electricity at the applicant
2095 premises.

2096 The prefix “EC” has been added to each criterion so that numbering remains unaffected by changes
2097 in numbering in other themes. The “(o)” after the criterion number indicates its optional nature.

2098 Overall, the “energy and climate” theme is structured as follows:

- 2099 • EC1(o): Energy efficient laundry → Formerly criterion O10-Efficiency of laundry washing
2100 machines owned or leased by the applicant (up to 4 points).
- 2101 • EC2(o): Greening of vehicle fleet → Formerly criterion O9-Vehicle fleet owned or leased by
2102 the applicant (up to 5 points).
- 2103 • EC3(o): **New:** EC3(o): Renewable electricity.
- 2104 • ECX(n/a): **Removed:** criterion O5-Energy efficiency for vacuum cleaners (3 points)

2105

2106

2107

⁶³ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

2108 EC1(o): Energy-efficient laundry (up to 4 points)

Existing criterion from Commission Decision (EU) 2018/680:

Criterion O10: Efficiency of laundry washing machines owned or leased by the applicant (up to 4 points)

This criterion only applies to washing machines owned or leased by the applicant, either located at the applicant's premises or cleaning sites, to launder cloths, mops and staff uniforms used as part of the EU Ecolabel indoor cleaning service provision.

Sub-criterion O10(a) is only applicable if household washing machines are used that are covered by Commission Delegated Regulation (EU) No 1061/2010 ⁽⁸⁾, as well as Commission Regulation (EU) No 1015/2010 ⁽⁹⁾, as applicable on 28 February 2021, or by Commission Delegated Regulation (EU) 2019/2014 ⁽¹⁰⁾.

O10 (a) Energy label (up to 2 points)

Or the applicant shall earn points based on the percentage of the household washing machines (rounded up to the next integer) complying with EU Energy Label rated class B or A for energy efficiency under Delegated Regulation (EU) No 2019/2014 as follows:

- At least 50% of class B or better machines: 1 point
- At least 90% of class B or better machines: 2 points
- At least 50% of A machines: 2 points

The applicant shall earn points based on the percentage of the household washing machines (rounded up to the next integer) complying with EU Energy Label rated class A++ or A+++ for energy efficiency under Delegated Regulation (EU) No 1061/2010, as follows:

- At least 50% of A++ machines: 1 point
- At least 90% of A++ machines: 2 points
- At least 50% of A+++ machines: 2 points

O10 (b) Water efficiency (2 points)

Household machines: the water consumption of the household laundry washing machines, owned or leased by the applicant, shall be lower or equal to the benchmarks for water consumption set out in Annex IV to Regulation (EU) No 1015/2010. The benchmarks are measured according to EN 60456, using the standard washing cycle (60 °C cotton programme).

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

AND

Commercial washing machines: the water consumption of commercial washing machines owned or leased by the applicant shall be lower than or equal to 7 L per kg of laundry washed.

Assessment and verification:

The applicant shall provide annual data (list of all household washing machines owned and used to launder cloths, mops and staff uniforms used as part of the EU Ecolabel indoor cleaning service provision) and documentation indicating the energy efficiency class for the existing household laundry washing machines.

Product fiches in accordance with Annex II to Delegated Regulation (EU) No 1061/2010 ⁽⁸⁾, as applicable on 28 February 2021, or Annex III to Delegated Regulation (EU) 2019/2014 ⁽¹⁰⁾ may be used as proof of compliance with this requirement.

In the case that the documentation mentioned above is not available, compliance with criterion O10(b) may be shown by providing documentation on the total annual water consumption. In this case a total of 220 standard washing cycles per year shall be assumed.

⁽⁸⁾ Commission Delegated Regulation (EU) No 1061/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household washing machines (OJ L 314, 30.11.2010, p. 47).

⁽⁹⁾ Commission Regulation (EU) No 1015/2010 of 10 November 2010 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for household washing machines (OJ L 293, 11.11.2010, p. 21).

⁽¹⁰⁾ 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, p. 29).

Proposed criterion for TR1:

Criterion O10-EC1 (o): Efficiency of laundry washing machines owned or leased by the applicant Energy-efficient laundry (up to 4 points)

Laundering of reusable cleaning textiles used in the provision of the EU Ecolabel indoor cleaning service shall be carried out either through (a) in-house laundering, or (b) through outsourced professional laundry services. Points shall be awarded where the applicant can demonstrate that laundering of reusable cleaning textiles is carried out in an energy-efficient manner.

(a) In-house laundering (up to 2 points)

Where laundering is carried out in-house, points shall be awarded as follows:

1 point: when at least 80% of washing machines labelled with energy efficiency class A under Delegated Regulation (EU) 2019/2014 or are qualifying professional washing machines ⁽¹⁾;

2 points: when at least 95% of washing machines labelled with energy efficiency class A under Delegated Regulation (EU) 2019/2014 or are qualifying professional washing machines ⁽¹⁾.

(b) Outsourced professional laundry services (up to 2 points)

Where laundering is outsourced, points shall be awarded where at least 80 % by weight of the annual outsourced laundry is sent to a professional laundry service provider that applies documented measures to improve the energy efficiency of laundry operations.

Points shall be awarded as follows:

– 1 point where the professional laundry service provider:

(a) monitors and records energy consumption for laundry operations;

(b) applies documented procedures for optimising washing and, where relevant, drying operations, including load factors and temperature selection; and

(c) provides the applicant with an annual declaration confirming the application of those measures.

– 2 points where the professional laundry service provider is either EMAS-registered, ISO 14001, ISO 50001 certified, or is covered by a valid EN ISO 14024 Type I ecolabel.

Assessment and verification

The applicant shall provide, as applicable:

For point (a):

– *an inventory of the washing machines used for in-house laundering of reusable cleaning textiles;*

– *for household washing machines, documentation showing that the machine has energy efficiency class A under Delegated Regulation (EU) 2019/2014;*

– *for professional washing machines, a copy or an excerpt from the manufacturer's operating instructions showing how the machine controls are to be used to optimise the energy efficiency of washing cycles;*

– *the applicant's own operating procedures and staff training material incorporating those instructions; and*

For point (b):

– *the contract or service agreement with the professional laundry service provider;*

– *an annual declaration from the provider confirming the implementation of documented energy-efficiency measures;*

– *documentation on annual energy performance expressed per kg of dry laundry processed;*

– where applicable, copies of valid EMAS, ISO 14001, ISO 50001 or ecolabel certificates; and
– records sufficient to demonstrate the proportion by weight of the applicant's annual outsourced laundry covered by the professional laundry service.

(1) For the purposes of this criterion, a qualifying professional washing machine shall mean a washing machine outside the scope of Delegated Regulation (EU) 2019/2014 for which:

(i) the manufacturer provides documented instructions on how the equipment controls are to be used to optimise the energy efficiency of washing cycles, including, where relevant, programme selection, load optimisation, temperature selection and the avoidance of unnecessary auxiliary functions; and

(ii) those instructions are incorporated into the applicant's operating procedures and staff training material relating to in-house laundry activities.

2109 Rationale for the proposed EC1(o) criterion (formally O10)

2110 By promoting the use of energy-efficient washing machines and encouraging professional laundry
2111 services to implement documented energy-saving measures, the criterion directly supports
2112 reductions in energy consumption and associated greenhouse gas emissions. It incentivises both in-
2113 house and outsourced laundry operations to adopt best practices in energy management, aligning
2114 with EU climate and resource efficiency goals. The requirement for clear documentation and
2115 verification ensures transparency and accountability, while recognising certified providers (EMAS,
2116 ISO 14001, ISO 50001, or ecolabelled) further strengthens environmental performance.

2117 Summary of changes

- 2118 • The proposed criterion now combines in-house and outsourced laundry, whereas they were
2119 previously separated (in O10 and O11(a)).
- 2120 • The proposed criterion introduces points for outsourcing to professional laundry services,
2121 with requirements for energy monitoring, optimisation procedures, and annual declarations,
2122 and higher points for EMAS, ISO 14001, ISO 50001, or ecolabel certification.
- 2123 • Water consumption benchmarks for household and commercial machines are no longer
2124 explicitly required in the new criterion.
- 2125 • the concept of “qualifying professional washing machines” is introduced.

2126 Stakeholder feedback on O5 (now EC1(o))

2127 Key takeaways about the energy efficient and water efficient washing machines used by the EU
2128 Ecolabel indoor cleaning service provider from the preliminary stakeholder survey are:

- 2129 • 68% recommended keeping O10 optional as-is; 8% suggested minor updates; 8% major
2130 updates; 0% suggested making it mandatory; 4% suggested removal.
- 2131 • Among those asked about difficulty, 33% reported difficulties, 39% reported no difficulty,
2132 and 28% had no opinion.
- 2133 • respondents highlighted the need to address industrial/commercial machines more clearly
2134 and to update thresholds in light of changes in energy classes (e.g. many machines in top
2135 classes) and new ecodesign rules. Water-efficiency clarifications were requested (handling

2136 >8 kg capacity, multiple machines, and definitions of ‘commercial’ vs ‘household’). Some
 2137 felt the current 4-point maximum is excessive and proposed reducing points.

2138 Comparison of existing ecolabels

2139 A comparison with other relevant ecolabel criteria on energy efficient and water-efficient washing
 2140 machines is provided below, together with references to relevant criteria in those ecolabels.

2141 Table 20. Energy and water efficient washing machines comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O10(a) Up to 2 points based on energy labels of A or B. (b) Up to 2 points based on water efficiency (highly nuanced by kg load)	No direct equivalent for washing-machine energy/water performance thresholds. Laundry detergents are included in O5 consumption calculations, but not machine efficiency.	No explicit washing-machine efficiency criteria (focus is on cleaning products and service routines).	Related but not equivalent: laundering procedures required (5.4(k)) and general preference for environmentally preferable equipment in 5.3(a); no energy label or water-use benchmarks.

2142 *Source: Own elaboration*

2143 The EU Ecolabel uniquely sets measurable efficiency benchmarks for laundry machines. The others
 2144 focus on detergents, laundering procedures, and general procurement rather than specific appliance
 2145 performance.

2146 General comments

2147 The proposal differs from criterion O10 in Decision (EU) 2018/680 by replacing a criterion focused
 2148 on household washing machines and water-consumption benchmarks with a broader criterion on
 2149 energy-efficient laundry management. The previous text referred to household appliances under the
 2150 former energy-labelling and ecodesign framework and included water benchmarks derived from
 2151 Regulation (EU) No 1015/2010. Since then, household washing machines and household washer-
 2152 dryers have moved to the current A to G energy-label framework under Delegated Regulation (EU)
 2153 2019/2014, while Regulation (EU) 2019/2023 repealed Regulation (EU) No 1015/2010. The revised
 2154 proposal therefore aligns the household-machine route with the current energy label, and avoids
 2155 reliance on older water-efficiency benchmarks tied to a previous test-cycle logic.

2156 Laundry remains an environmentally relevant aspect of indoor cleaning services, as shown in the
 2157 environmental analysis of the Preliminary Report, because reusable cloths, mopheads, and
 2158 workwear are washed repeatedly throughout service delivery and can result in significant electricity
 2159 demand over time. The proposal, therefore, keeps laundry within the optional criteria but reframes it
 2160 around reducing energy use in actual operations. It rewards three routes that are relevant in
 2161 practice: use of highly efficient household washing machines where these are used, operation of
 2162 professional washing machines in accordance with documented manufacturer guidance for energy-
 2163 efficient cycle control, and use of outsourced professional laundry services that can demonstrate
 2164 energy-management practices.

2165 The revised structure is intended to be proportionate and more representative of the sector. It does
 2166 not rely solely on new household machines and therefore does not create an unnecessary incentive
 2167 for premature equipment replacement. At the same time, it recognises that there is no equivalent

2168 EU energy-labelling framework for larger professional washing machines and therefore uses
2169 documented operating controls and staff training, rather than notional label equivalence under test
2170 cycle conditions, as the basis for qualification. The outsourced-laundry route further reflects the
2171 practical reality that many cleaning-service providers rely on specialised laundry contractors whose
2172 process efficiency is managed as part of normal operations. Taken together, the proposal remains
2173 consistent with the objective of Regulation (EC) No 66/2010 to promote services with a high level of
2174 environmental performance, while updating criterion O10 to reflect the current EU product-policy
2175 framework and the operational realities of the cleaning-services sector.

2176 Points for discussion 21 – EC1(o): Energy-efficient laundry

2177 Stakeholders are invited to reply to the following consultation question/s:

2178 – Question 56 (Q56) - Does this criterion seem relevant to you? Should it be removed or moved to
2179 mandatory? Please, justify your answer.

2180 – Question 57 (Q57) - Please, provide any other comments that you deem relevant to any aspect of *EC1*
2181 criterion.

2182

2183 EC2(o): Vehicle fleet with low environmental impacts (up to 5 points)

Existing criterion from Commission Decision (EU) 2018/680:

Criterion O9: Vehicle fleet owned or leased by the applicant (up to 5 points)

Only the vehicle fleet owned and/or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning service tasks is covered by this criterion. The vehicles may include human-powered vehicles (cargo-bikes), human-powered vehicles with electric assist (e-cargo-bikes), light passenger or commercial vehicles used by managers, supervisors, cleaning staff, inspectors and any other person taking part in some aspect of the provision of the cleaning service.

Sub-criterion O9(a) also covers hybrid vehicles but not electric vehicles.

Sub-criterion O9(b) covers zero emission vehicles.

Privately owned vehicles that are used in the provision of the service are not covered by this criterion.

O9 (a) Vehicles meeting European emission standards Euro 6 (1 point)

At least 50% of the vehicles (rounded up to the next integer) owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning service tasks shall meet the European emission standard Euro 6 for light passenger and commercial vehicles.

Assessment and verification:

The applicant shall provide the relevant documentation showing which vehicles are used in the provision of the cleaning services, that they are owned or leased by the applicant, and shall indicate which vehicles meet the standard Euro 6. The vehicles' public registration can be used as proof of compliance, along with the certificate of conformity.

O9 (b) Zero emission vehicles (2 points)

At least 10% of the vehicles (rounded up to the next integer) owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning service tasks shall be zero emission vehicles as determined by new European driving cycle (NEDC) tests as described in Regulation (EC) No 715/2007/10, human-powered vehicles (cargo-bikes) or human-powered vehicles with electric assist (e-cargo-bikes).

Assessment and verification:

The applicant shall provide the relevant documentation showing which vehicles are used in the provision of the EU Ecolabel indoor cleaning services, that they are owned or leased by the applicant, and shall indicate which vehicles are zero-emission. The vehicles' public registration can be used as proof of compliance, along with manufacturer documentation showing the NEDC test results.

Proposed criterion for TR1:

~~Criterion O9~~EC2(o): Vehicle fleet owned or leased by the applicant with low environmental impacts (up to 5 points)

This criterion applies only to company-owned or company-leased vehicles used in the provision of the EU Ecolabel indoor cleaning service, including vehicles used by managers, supervisors, cleaners, or inspectors, or for the transport of cleaning products, cleaning accessories, or other materials associated with the service. This criterion shall not apply to privately owned vehicles used by staff.

Points shall be awarded where the applicant can demonstrate that the nature of their vehicle fleet and its management reduces greenhouse gas emissions, air pollutant emissions and fuel consumption.

(a) Zero-emission vehicles and cargo bikes ⁽¹⁾ (up to 3 points)

Points shall be awarded where a share of the relevant fleet ⁽²⁾ consists of zero-emission vehicles and/or cargo bikes as described below:

- 1 point where at least 20 % of the relevant fleet consists of zero-emission vehicles and/or cargo bikes;
- 2 points where at least 50 % of the relevant fleet consists of zero-emission vehicles and/or cargo bikes;
- 3 points where at least 80 % of the relevant fleet consists of zero-emission vehicles and/or cargo bikes.

(b) Fleet transition and transport management plan (up to 2 points)

Points shall be awarded where the applicant has established and implements a documented fleet transition and transport management plan covering the relevant fleet. The plan shall include, as applicable:

- an inventory of the relevant fleet, including vehicle category, powertrain and principal use;
- measures to reduce transport demand associated with the service, including route planning, consolidation of visits, site allocation of staff, reduction of unnecessary supervisory travel, or use of cargo bikes where feasible;
- procedures to minimise fuel or energy consumption, including preventive maintenance, tyre pressure checks and eco-driving instructions for relevant staff;
- a policy or target for the phased uptake of zero-emission vehicles when replacing vehicles in the relevant fleet; and
- annual monitoring of the composition of the relevant fleet and of progress in implementing the plan.

0.5 points shall be awarded for each item from the list above that is incorporated into the fleet transition and transport management plan, up to a maximum of 2 points.

Assessment and verification

In cases where points are being claimed under this optional criterion for point (a), the applicant shall provide a declaration of compliance, supported by an inventory of all the vehicles owned or leased by the applicant and clearly indicating which vehicles from their fleet are used in the provision of the EU Ecolabel indoor cleaning services. For each zero-emission vehicle, the applicant shall provide registration documents, lease documents, manufacturer documentation or equivalent

records showing that each vehicle counted as a zero-emission vehicle has zero tailpipe CO₂ emissions. For cargo bikes and electrically assisted cargo bikes counted under the criterion, purchase or inventory records shall suffice.

In cases where points are being claimed under this optional criterion for point (b), the applicant shall provide a declaration of compliance, supported by a fleet transition and transport management plan. The applicant shall clearly indicate which parts of the plan correspond to the points listed above.

(1) "Zero-emission vehicle" means a vehicle with zero tailpipe CO₂ emissions; cargo bike includes cargo cycles and electrically assisted cargo cycles used in the provision of the service.

(2) "Relevant fleet" means the vehicles owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning service.

2184 Rationale for the proposed EC2(o) criterion (formally O9)

2185 This criterion is highly relevant because transportation associated with indoor cleaning services
2186 contributes to greenhouse gas emissions, air pollution, and fuel consumption. By incentivising the
2187 use of zero-emission vehicles and cargo bikes, as well as the implementation of a fleet transition
2188 and transport management plan, the criterion directly supports the reduction of the sector's
2189 environmental footprint. It encourages service providers to modernise their fleets, adopt sustainable
2190 transport practices, and plan for the gradual uptake of cleaner vehicles.

2191 Summary of changes

- 2192 • Proposed change in criterion title.
- 2193 • Points for zero-emission vehicles and cargo bikes are now awarded on a three-tiered scale,
2194 replacing the previous fixed thresholds.
- 2195 • The previous criterion awarded points for Euro 6 vehicles; the proposed criterion is more
2196 stringent, focusing exclusively on zero-emission vehicles and cargo bikes.
- 2197 • Points can now be earned for a documented fleet management plan with specific measures,
2198 a new requirement not in the previous criterion.
- 2199 • Verification now requires a compliance declaration, detailed fleet records, and the
2200 management plan, instead of just registration and emission documents.

2201 Stakeholder feedback on O9 (now EC2(o))

2202 Key takeaways about the vehicle fleet owned or leased by the EU Ecolabel indoor cleaning service
2203 provider from the preliminary stakeholder survey are:

- 2204 • 63% recommended keeping O9 optional as-is; 19% suggested minor updates; 12% major
2205 updates; 4% suggested making it mandatory; 2% suggested removal.
- 2206 • Among those asked about difficulty, 38% reported no difficulty, 24% reported difficulties,
2207 and 38% had no opinion.
- 2208 • challenges were often economic (investment capacity) and contextual (some staff commute
2209 via public transport, reducing relevance). Respondents proposed broadening the criterion to
2210 cover cases without a fleet but strong sustainable mobility practices, and/or increasing

2211 minimum shares for zero-emission vehicles and updating requirements for new vehicle
 2212 purchases.

2213 Comparison of existing ecolabels

2214 A comparison with other relevant ecolabel criteria on owned or leased vehicle fleets is provided
 2215 below, together with references to relevant criteria in those ecolabels.

2216 Table 21. Vehicle fleets comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O9(a) Euro 6 vehicles, (b) zero emission vehicles, (c) company transport plan.	Strong match: O12 routines for purchasing/leasing low-emission vehicles; O13 maximum transport energy consumption; P4 points for low consumption/active travel; O22 includes eco-driving training.	No comparable fleet criteria in GS-42.	Partial match: procurement policy covers vehicles (5.3(a)); training includes route planning/driving style and vehicle maintenance to minimise fuel (5.5.2); energy management includes vehicle servicing/minimising fuel (5.7).

2217 *Source: Own elaboration*

2218 The EU Ecolabel and Nordic Swan are the most prescriptive on fleet/transport metrics. The NZ Eco
 2219 Choice addresses fleet impacts via procurement, training, and maintenance requirements. Green
 2220 Seal largely stays building-focused and does not regulate the vehicle fleet.

2221 General comments

2222 The existing O9 criterion in Decision (EU) 2018/680 was designed around late-2010s policy
 2223 references: a first tier based on Euro 6 vehicles, a second tier based on a small share of zero-
 2224 emission vehicles defined using NEDC (New European Driving Council) wording, and a transport-plan
 2225 requirement. That structure is now dated. Euro 6 remains relevant as an air-pollutant compliance
 2226 standard, but it is no longer an ambitious marker of environmental leadership for light-duty
 2227 vehicles. In current EU policy, the main strategic direction for cars and vans is the transition to zero-
 2228 emission mobility, supported by the CO2 standards for new cars and vans under Regulation (EU)
 2229 2019/631 as amended ⁽⁶⁴⁾.

2230 A revised criterion is justified because vehicle use can be a material contributor to the
 2231 environmental profile of an indoor cleaning service. Service delivery commonly requires supervisors,
 2232 inspectors and cleaning staff to travel between sites, and often also involves transporting
 2233 consumables, accessories and reusable textiles. For passenger cars and vans, the European
 2234 Commission states that these vehicle groups are responsible for around 16 % and 3 % respectively
 2235 of total EU CO2 emissions, underlining the broader policy importance of reducing emissions from

⁶⁴ European Commission, Cars and vans – road transport decarbonisation. See: https://climate.ec.europa.eu/eu-action/transport-decarbonisation/road-transport/cars-and-vans_en

2236 road transport ⁽⁶⁵⁾. In a service context, both vehicle technology and the way fleets are organised
2237 therefore matter.

2238 Market evidence shows that passenger cars and vans are evolving differently, which also supports a
2239 more modern, flexible criterion design. In the passenger-car market, diesel declined from 35.9 % of
2240 new EU registrations in 2018 to 11.9 % in 2024, while hybrids and battery-electric vehicles gained
2241 substantial market share ⁽⁶⁶⁾. In 2024, petrol cars accounted for 33.3 % of new registrations,
2242 hybrid-electric cars for 30.9 %, battery-electric cars for 13.6 %, plug-in hybrids for 7.3 % and diesel
2243 for 11.9 %. For vans, the transition is slower: ACEA reports that diesel still represented 84.5 % of
2244 new EU van registrations in 2024, while electrically chargeable vans accounted for 6.1 % and
2245 hybrids for 2.0 % ⁽⁶⁷⁾. The EEA likewise notes that electric vans remained a relatively small share of
2246 registrations in 2024 and that nearly all electric van registrations were battery-electric, while plug-
2247 in hybrid vans were negligible ⁽⁶⁸⁾.

2248 This market picture suggests that the previous O9 thresholds should not simply be updated
2249 numerically. Instead, the criterion should be reframed around the best-aligned environmental
2250 outcome, namely the use of zero-emission vehicles and cargo-bike solutions where feasible,
2251 combined with a management route that reduces transport demand and improves fleet
2252 performance in practice. This is particularly relevant because a cleaning service provider may rely
2253 on both passenger cars and light commercial vans, and these segments are progressing at different
2254 rates toward electrification.

2255 The proposed criterion is also more coherent with recent EU policy terminology. The EU Taxonomy
2256 technical screening criteria for the activity 'Transport by motorbikes, passenger cars and light
2257 commercial vehicles' move to a zero-specific-CO₂-emissions threshold from 1 January 2026, which
2258 points clearly toward battery-electric and hydrogen fuel-cell vehicles as the long-term benchmark
2259 for environmentally sustainable light-duty road transport ⁽⁶⁹⁾. Similarly, the Alternative Fuels
2260 Infrastructure Regulation states that LPG and CNG vehicles are expected to be gradually replaced
2261 by zero-emission powertrains, indicating that these technologies are no longer viewed as the main
2262 long-term endpoint for green fleet policy ⁽⁷⁰⁾. The revised Clean Vehicles Directive also reinforces
2263 the distinction between transitional low-emission vehicles and zero-emission vehicles in public
2264 procurement ⁽⁷¹⁾.

2265 Against this background, the new proposal no longer uses Euro 6 as a point-scoring threshold and
2266 no longer relies on NEDC wording. Instead, it places the highest emphasis on zero-emission vehicles

⁶⁵ ACEA, New car registrations in 2024: fuel shares for new passenger cars in the EU. <https://www.acea.auto/pc-registrations/new-car-registrations-0-8-in-2024-battery-electric-13-6-market-share/>

⁶⁶ ACEA, Economic and Market Report 2018 (full year) – passenger car powertrain shares. https://www.acea.auto/uploads/statistic_documents/Economic_and_Market_Report_full-year_2018.pdf

⁶⁷ ACEA, New commercial vehicle registrations in 2024: van powertrain shares. <https://www.acea.auto/cv-registrations/new-commercial-vehicle-registrations-vans-8-3-trucks-6-3-buses-9-2-in-2024/>

⁶⁸ EEA, New registrations of electric vans in Europe. <https://www.eea.europa.eu/en/analysis/indicators/new-registrations-of-electric-vans-in-europe>

⁶⁹ Commission Delegated Regulation (EU) 2021/2139 (EU Taxonomy technical screening criteria). https://eur-lex.europa.eu/eli/reg_del/2021/2139/2024-01-01/eng

⁷⁰ Regulation (EU) 2023/1804 on the deployment of alternative fuels infrastructure (AFIR). <https://eur-lex.europa.eu/eli/reg/2023/1804/oj/eng>

⁷¹ European Commission, Clean Vehicles Directive overview. https://transport.ec.europa.eu/transport-themes/clean-transport/clean-and-energy-efficient-vehicles/clean-vehicles-directive_en

2267 and cargo bikes, while retaining an additional route based on a documented fleet transition and
2268 transport management plan. This reflects the reality that, for indoor cleaning services, travel
2269 demand can often be reduced through better route planning, site allocation of staff, consolidation
2270 of visits, preventive maintenance and eco-driving, even where the complete replacement of vans is
2271 not yet immediately feasible. The management-plan route therefore helps maintain ambition while
2272 avoiding a disproportionate requirement to replace functioning vehicles prematurely.

2273 The proposal is also broadly consistent with the direction taken by other relevant Type I ecolabel
2274 schemes, while remaining adapted to the EU market and legal framework. The Nordic Swan
2275 Ecolabel criteria for cleaning services explicitly state that the climate impact from transport is
2276 reduced by shifting to more energy-efficient vehicles and moving away from fossil fuels. New
2277 Zealand Eco Choice requires work instructions to include vehicle servicing in accordance with
2278 manufacturer recommendations and general requirements to minimise vehicle fuel use. Green Seal
2279 GS-42 places strong emphasis on building-specific operating procedures, equipment maintenance
2280 and operational management, although it does not provide an equivalent dedicated vehicle-fleet
2281 award criterion. The proposed new criterion is therefore more specific than some of these schemes
2282 regarding fleet technology, but it remains aligned with the broader ecolabel trend of combining
2283 operational planning with demonstrable environmental improvements.

2284 Overall, the proposed revision better reflects current EU climate and transport policy, current market
2285 terminology and current vehicle-registration trends than the existing O9 criterion.

2286 Points for discussion 22 – EC2(o): Vehicle fleet with low environmental impacts

2287 Stakeholders are invited to reply to the following consultation question/s:

2288 — Question 58 (Q58) - Does this criterion seem relevant to you? Should it be removed or moved to
2289 mandatory? Please, justify your answer.

2290 — Question 59 (Q59) - Please, provide any other comments that you deem relevant to any aspect of EC2
2291 criterion.

2292

2293 EC3(o): Renewable electricity (up to 5 points)

Existing criterion from Commission Decision (EU) 2018/680:
No previous criterion in Decision (EU) 2018/680
Proposed criterion for TR1: EC3(o): Renewable electricity (up to 5 points)
<p>Points shall be awarded where the applicant can demonstrate the use of renewable electricity and/or the deployment of on-site solar photovoltaic (PV) installations at premises owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning service. Such premises may include offices, storage facilities, depots, staff facilities, premises used for in-house laundering of reusable textiles, and premises where vehicles or equipment used for the service are parked and charged when not in use.</p> <p>Applicants may combine points awarded under points (a), (b) and (c), up to a maximum of 5 points.</p> <p>(a) Renewable electricity used at applicant premises (up to 3 points)</p> <p>Points shall be awarded where the applicant can demonstrate that electricity used at their premises is covered by renewable electricity, whether through on-site renewable electricity generation, renewable electricity purchased from an electricity supplier, or a combination of both.</p> <p>Points shall be awarded as follows:</p> <ul style="list-style-type: none">• 1 point where at least 50 % of the annual electricity consumption at the applicant premises is covered by renewable electricity;• 2 points where at least 80 % of the annual electricity consumption at the applicant premises is covered by renewable electricity;• 3 points where 100 % of the annual electricity consumption at the applicant premises is covered by renewable electricity. <p>(b) Roof space used for on-site solar PV generation (2 points)</p> <p>Two points shall be awarded where at least 50 % of the usable roof area ⁽¹⁾ of buildings owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning service is occupied by operational solar photovoltaic panels.</p> <p>(c) Car park spaces covered by solar PV canopies (2 points)</p> <p>Two points shall be awarded where at least 50% of the open-air car park spaces ⁽²⁾ at the applicant's premises are covered by operational solar photovoltaic canopies.</p> <p><i>Assessment and verification:</i></p> <p><i>In cases where points are being claimed under this optional criterion for point (a), the applicant shall provide a declaration of compliance, supported by: a list of the premises covered by the criterion and a description of the activities carried out at those premises; records of annual electricity consumption for each covered premise, based on electricity bills, meter readings or</i></p>

equivalent accounting records; where renewable electricity is purchased, contractual documentation, supplier declarations, guarantees of origin, or equivalent records showing the quantity of renewable electricity supplied.

In cases where points are being claimed under this optional criterion for point (b), the applicant shall provide a declaration of compliance, supported by: a list of the buildings exclusively owned or leased by the applicant and covered by the criterion; plans, drawings, satellite images, asset records or equivalent documentation showing the total usable roof area and the area occupied by solar PV panels; where relevant, a brief explanation of any roof areas excluded from the calculation due to technical, legal or safety constraints.

In cases where points are being claimed under this optional criterion for point (c), the applicant shall provide a declaration of compliance, supported by: site plans, drawings, aerial photographs or equivalent documentation showing the total number of car park spaces and the number covered by solar PV canopies.

(1) Usable roof area refers to those parts of the roof that are deemed technically suitable for the installation of PV panels. It shall exclude areas made unavailable by shading, structural limitations, roof safety requirements, building services equipment, legal restrictions or other permanent technical constraints.

(2) Open-air car park spaces refers to the areas occupied by the parking spaces alone, not to any areas that correspond to access roads, turning areas, ingress and egress lanes, loading areas and other non-parking surfaces shall not be counted as car park spaces.

2294 Rationale for the proposed EC3(o) criterion

2295 The proposed criterion addresses a gap in Decision (EU) 2018/680. The current EU Ecolabel criteria
2296 for indoor cleaning services include optional criteria for transport and laundry-related equipment,
2297 but they do not include a dedicated criterion on the sourcing of renewable electricity at applicant
2298 premises. This omission is increasingly material because electricity use is becoming more relevant
2299 to the environmental profile of cleaning services due to the growing electrification of end-use
2300 sectors, notably where premises are used for in-house laundering of reusable textiles, charging of
2301 electric vehicles, charging of battery-powered cleaning equipment, or routine office and depot
2302 operations.

2303 Summary of changes

- 2304 • No previous criterion

2305 Stakeholder feedback on new criterion EC3(o)

2306 No feedback on this criterion was received in the preliminary survey, as it was not part of EU
2307 Ecolabel criteria established in Commission Decision (EU) 2018/680, currently in force.

2308 Comparison of existing ecolabels

2309 A comparison with other relevant ecolabel criteria on this criterion is provided below, together with
2310 references to relevant criteria in those ecolabels.

2311 Table 22. Renewable electricity comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
Not part of the previous EU Ecolabel criteria	No direct criterion on the topic	No direct criterion on the topic	No direct criterion on the topic

2312 *Source: Own elaboration*

2313 General comments

2314 The proposal is intentionally structured in two layers. The first layer rewards the actual use of
 2315 renewable electricity at applicant premises, whether sourced through on-site generation, renewable
 2316 electricity purchased from a supplier, or a combination of both. This reflects the current EU
 2317 framework under the Renewable Energy Directive, in which guarantees of origin are the standard
 2318 instrument for substantiating the renewable share or quantity of electricity supplied to final
 2319 consumers and are issued, transferred and cancelled electronically in units of 1 MWh. The second
 2320 layer rewards the occupation of suitable roof space and car-park spaces by on-site solar PV. This
 2321 recognises the additional long-term value of visible on-site solar deployment, while avoiding the
 2322 need to make on-site generation a prerequisite for scoring under the criterion.

2323 The proposal is also designed to be realistic for cleaning service providers of different sizes. Not all
 2324 applicants have sufficient control over their buildings to install PV, and not all leased premises are
 2325 technically suitable for rooftop generation. By allowing renewable grid electricity to qualify, the
 2326 proposal remains accessible to small and medium-sized operators through mechanisms that are
 2327 already available in the market, such as supplier-backed renewable electricity contracts supported
 2328 by guarantees of origin. At the same time, the criterion gives additional recognition to applicants
 2329 who control suitable assets and deploy solar PV on usable roof space or as car-park canopies. The
 2330 thresholds proposed for on-site solar are therefore based on site occupation rather than on a
 2331 required annual generation yield, which would be more burdensome and more sensitive to
 2332 differences in geography, orientation and shading.

2333 The proposal also sits coherently within wider EU policy. The [Renewable Energy Directive](#) ⁽⁷²⁾ (EC,
 2334 2023) supports renewable self-consumption and the use of guarantees of origin to disclose
 2335 renewable electricity. In parallel, the recast [Energy Performance of Buildings Directive](#) ⁽⁷³⁾ (EC,
 2336 2024b) has strengthened the policy signal for solar energy in buildings and requires Member States
 2337 to establish criteria for the deployment of solar installations on buildings, taking account of
 2338 technical and economic potential and other roof uses. Against that background, a criterion
 2339 rewarding renewable electricity use and substantial occupation of usable roof and car-park space
 2340 by PV is consistent with the Union's broader direction of travel on building decarbonisation,
 2341 electrification and distributed renewable generation.

⁷² Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652 (OJ L, 2023/2413, 31.10.2023). Available at [this link](#).

⁷³ Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings (recast) (OJ L, 2024/1275, 8.5.2024). Available at [this link](#).

2342 Compared with other ecolabel schemes for cleaning services, the proposal would extend current
2343 practice rather than duplicate it. The Nordic Swan criteria for cleaning services contain requirements
2344 on transport-related energy use and the purchase of lower-emission vehicles, but no direct criterion
2345 on renewable electricity sourcing or on-site solar PV at applicant premises. Green Seal GS-42
2346 contains requirements for environmentally preferable products, powered cleaning equipment and
2347 operational procedures, but no dedicated criterion on renewable electricity procurement or solar
2348 deployment. The New Zealand Eco Choice includes an energy management requirement focused on
2349 work instructions and vehicle servicing, but it does not include a requirement on renewable
2350 electricity purchasing or the use of roof or car-park space for on-site PV. The proposed criterion
2351 would therefore fill a gap not explicitly addressed by the other ecolabel schemes reviewed.

2352 For these reasons, a new optional criterion on renewable electricity and on-site solar generation
2353 appears justified. It is environmentally relevant to the decarbonisation of cleaning service
2354 operations, aligned with current EU renewable-energy and building policy, and realistic in market
2355 terms because it combines a broadly accessible route based on renewable electricity supply with
2356 additional reward for applicants able to deploy PV on premises under their control.

2357 Points for discussion 23 – EC3(o): Renewable electricity

2358 Stakeholders are invited to reply to the following consultation question/s:

2359 — Question 60 (Q60) - Do you agree with the addition of this new optional criterion? Should it be
2360 removed or moved to mandatory? Please, justify your answer.

2361 — Question 61 (Q61) - Is your company already investing or considering the possibility to invest on the
2362 installation and use of renewable electricity? If so, which is your experience?

2363 — Question 62 (Q62) - Would you support including in the requirement energy management system
2364 certification such as ISO 50001? Please, justify your answer.

2365 — Question 63 (Q63) - Please, provide any other comments that you deem relevant to any aspect of *EC3*
2366 criterion.

2367

2368 ECX(removed): Energy efficiency for vacuum cleaners

<p>Existing criterion from Commission Decision (EU) 2018/680: Criterion O5: Energy efficiency for vacuum cleaners (3 points)</p>
<p>Only vacuum cleaners covered by the scope of Commission Regulation (EU) No 666/2013 are covered by this criterion. Exempted from the scope of that Regulation are wet, wet and dry, robots, industrial, central and battery operated vacuum cleaners and floor polishers and outdoor vacuum cleaners.</p> <p>At least 40 % of the vacuum cleaners (rounded up to the next integer) owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning services shall have an annual energy consumption (AE) as laid down in Annex II, point 3 of Regulation (EU) No 666/2013:</p> <ul style="list-style-type: none">— below 28 kWh/year for vacuum cleaners bought before 1 September 2017,— below 22 kWh/year for vacuum cleaners bought after 1 September 2017. <p><i>Assessment and verification</i></p> <p><i>The applicant shall provide documentation demonstrating compliance with the annual energy consumption requirements (such as a manufacturer declaration), along with a full list of vacuum cleaners used in the provision of EU Ecolabel services.</i></p>
<p>Proposed criterion for TR1: Criterion O5: Energy efficiency for vacuum cleaners (3 points)</p>
<p>Proposed to remove this criterion</p>

2369 Rationale for the proposed ECX(removed) criterion (formally O5)

2370 This criterion is included in the current EU Ecolabel criteria due to the importance of vacuum
2371 cleaners as most frequently used pieces of energy-powered equipment used by the cleaning service
2372 sector and the contribution of the energy consumption linked to vacuum cleaners to the potential
2373 environmental impacts of these services. However, a number of concerns related to current criterion
2374 O5 on the energy efficiency of vacuum cleaners has been identified, leading to the proposal of its
2375 removal.

2376 Summary of changes

- The criterion is proposed to be removed

2378 Stakeholder feedback on O5 (now ECX(removed))

2379 Key takeaways about the energy efficient vacuum cleaners used by the EU Ecolabel indoor cleaning
2380 service provider from the preliminary stakeholder survey are:

- 65% recommended keeping O5 optional as-is; 16% suggested minor updates; 7% major updates; 4% suggested making it mandatory; 9% suggested removal.

2383 • Among those asked about difficulty, 45% reported difficulties, 25% reported no difficulty,
2384 and 30% had no opinion.

2385 • a recurring theme was potential obsolescence/poor fit with current market and regulation
2386 (e.g. difficulties using kWh/year values, missing data on technical sheets, and limited
2387 compliant products). Respondents suggested updating references to obsolete regulation,
2388 potentially extending to other equipment (washer-dryers, carpet cleaners), considering
2389 repairability, and aligning with other ecolabel criteria (e.g. tourist accommodation energy
2390 criteria). Some argued the requirement should be mandatory where applicable.

2391 Comparison of existing ecolabels

2392 A comparison with other relevant ecolabel criteria on energy efficient vacuum cleaners is provided
2393 below, together with references to relevant criteria in those ecolabels.

2394 Table 23. Energy efficient vacuum cleaners comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
O5 At least 40% of vacuum cleaners owned or leased by the applicant that are covered by the scope of Regulation (EC) No 666/2013 shall be rated with energy consumption <28 or <22 kWh/yr depending on when purchased	No comparable vacuum energy-efficiency criterion (future work noted in the criteria).	Related but not equivalent: 4.2 specifies vacuum performance/criteria (CRI program) and noise (<70 dBA), rather than energy consumption.	Partial: procurement policy should prefer environmentally preferable equipment (incl. energy efficiency) in 5.3(a), but no vacuum-specific thresholds.

2395 *Source: Own elaboration*

2396 The EU Ecolabel is the only scheme with vacuum cleaner energy-consumption thresholds. The Green
2397 Seal focuses on performance/noise, whereas the NZ Eco Choice uses a general ‘prefer efficient
2398 equipment’ approach.

2399 General comments

2400 The main concerns related to the criterion on energy efficiency for vacuum cleaners are:

2401 • Criterion O5 now relies only on fallback thresholds under the ecodesign regulation. In the
2402 current EU Ecolabel decision, O5 is an optional 3-point criterion requiring only 40% of
2403 relevant vacuum cleaners to meet specified annual energy-consumption thresholds.

2404 • Vacuum cleaners are no longer supported by an active EU energy label on the market in the
2405 framework of [Regulation \(EU\) 2017/1369](#) ⁽⁷⁴⁾ (EC, 2017). The Commission’s current product

⁷⁴ Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU (OJ L 198, 28.7.2017, pp. 1–23). Available at [this link](#).

- 2406 listing shows vacuum cleaners under ecodesign only, whereas other product groups
2407 continue to appear under both ecodesign and energy labelling where applicable.
- 2408 • Moreover, the current ecodesign regulation for vacuum cleaners ([Regulation \(EU\) No](#)
2409 [666/2013](#) ⁽⁷⁵⁾ (EC, 2013)) is only partially relevant to indoor cleaning services, as it does not
2410 cover several types of vacuum cleaners commonly used in professional cleaning, such as
2411 wet, wet-and-dry, battery operated, robot, industrial or central systems.
 - 2412 • There is therefore no clear European Product Registry for Energy Labelling (EPREL)-based
2413 market evidence base for ambition-setting. EPREL is the Commission database for products
2414 bearing an energy label; in the absence of an active energy label for vacuum cleaners, it
2415 does not provide the same transparent basis for assessing market distribution and
2416 calibrating threshold ambition for this product group.
 - 2417 • The remaining ecodesign framework is not, by itself, a strong basis for a dedicated EU
2418 Ecolabel service criterion. Ecodesign requirements primarily set minimum product
2419 requirements, rather than providing the market-differentiation function normally used to
2420 justify ecolabel ambition levels.
 - 2421 • Furthermore, the current ecodesign regulation is already only of partial relevance to indoor
2422 cleaning services. Wet, wet and dry, battery operated, robot, industrial, or central vacuum
2423 cleaners are not covered by the current ecodesign regulation.

2424 Based on these considerations, and also noting that none of the other ecolabels had quantitative
2425 energy consumption related criteria for vacuum cleaners, the removal of this criterion at this stage
2426 appears well justified.

2427 Work is ongoing at EU level to revise and potentially reintroduce energy labelling for household
2428 vacuum cleaners ⁽⁷⁶⁾. However, this process is not yet complete and cannot be used as a basis for
2429 revising O5 at this stage. The possibility of including a criterion based on this hypothetical energy
2430 label may be explored later in the ongoing revision of EU Ecolabel criteria for indoor cleaning
2431 services, depending on the evolution of the initiative to review the energy efficiency and ecodesign
2432 requirements for vacuum cleaners. A requirement on this could refer to “the highest significantly
2433 populated classes of energy efficiency”, following the example of the [EU Energy Labelling](#)
2434 [Framework Regulation](#) ⁽⁷⁷⁾ (EC, 2017).

2435
2436
2437

⁷⁵ Commission Regulation (EU) No 666/2013 of 8 July 2013 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for vacuum cleaners (OJ L 192, 13.7.2013, p. 2-12). Available at [this link](#).

⁷⁶ See: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12832-Energy-efficiency-ecodesign-requirements-for-vacuum-cleaners-review- en>

⁷⁷ Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU (OJ L 198, 28.7.2017, pp. 1–23). Available at [this link](#).

2438 Points for discussion 24 – ECX(removed): Energy efficiency for vacuum cleaners (3 points)

2439 Stakeholders are invited to reply to the following consultation question/s:

- 2440 — Question 64 (Q64) - Do you agree with the removal of this criterion? Or do you think it should be
2441 included as an optional criterion or a mandatory criterion? Please, justify your answer.
- 2442 — Question 65 (Q65) – Do you think that there should be an energy efficiency requirement on cleaning
2443 machines? If so, how to develop that criterion and how to assess and verify?
- 2444 — Question 66 (Q66) – Do you have any data on energy consumption of vacuum cleaners or other
2445 cleaning machines that you could share with the JRC in order to define a minimum threshold of energy
2446 efficiency for this criterion?
- 2447 — Question 67 (Q67) - Please, provide any other comments that you deem relevant to any aspect of *EC4*
2448 criterion.

2449

2450 5.4. Theme 4: Social

2451 This theme and the proposed requirements therein are new because there were no specific criteria
2452 on social aspects of indoor cleaning service providers set out in [Commission Decision \(EU\)](#)
2453 [2018/680](#) ⁽⁷⁸⁾ (EC, 2018). All of the social requirements here are optional, and some are only
2454 applicable in cases where the applicant is a large enterprise in terms of the number of employees
2455 (i.e. 250 or more).

2456 The proposed measures are intended to go beyond compliance with applicable Union, national,
2457 regional and local legislation, collective agreements, and binding requirements concerning labour
2458 rights, social protection, equal treatment, and occupational health and safety.

2459 For clarity, the commitments referred to in this section apply to workers assigned to the EU Ecolabel
2460 indoor cleaning service contract. Where temporary substitute staff are hired, the same social
2461 requirements should apply to them to the extent practical. For example, rights to paid training would
2462 not apply to a worker supplied by a temporary staff agency who is covering the holiday leave of
2463 permanent staff. However, the temporary worker should still have access to at least some of the
2464 same mechanisms for worker participation and social dialogue as permanent staff.

2465 Compliance with the optional social criteria shall be supported by documented procedures,
2466 implementation records and, where relevant, anonymised examples demonstrating that the
2467 measures are effectively applied in practice.

2468 The prefix “SC” has been added to each criterion so that numbering remains unaffected by changes
2469 in numbering in other themes. The “(o)” after the criterion number indicates its optional nature.

2470 Overall, the “social” theme is structured as follows:

- 2471 • SC1(o): Predictable and worker-adapted scheduling (1 point).
- 2472 • SC2(o): Paid training and skills development beyond mandatory training (1 point).
- 2473 • SC3(o): Worker participation and social dialogue (1 point). (Large enterprises only).
- 2474 • SC4(o): Inclusive recruitment, retention and progression measures (1 point)

2475

⁷⁸ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

2476 SC1(o): Predictable and worker-adapted scheduling (up to 1 point)

Existing criterion from Commission Decision (EU) 2018/680:

No existing requirement

Proposed criterion for TR1

SC1(o): Predictable and worker-adapted scheduling (up to 1 point)

0.5 points shall be awarded where the applicant implements a documented scheduling policy for workers assigned to the contract that satisfies all of the following conditions:

- a) work schedules are communicated to workers at least 7 calendar days in advance;
- b) any subsequent change to a scheduled shift, start time, finish time or assigned site is communicated at least 24 hours in advance, except in duly justified cases of absence, emergency or force majeure;
- c) workers are not routinely assigned split shifts on the same day unless objectively justified by the nature of the service;
- d) individual shifts normally have a minimum duration of 2 consecutive paid hours, except where the worker has expressly requested otherwise;
- e) where the contract covers more than one site, schedules are organised so as to minimise unnecessary fragmentation of working time and avoidable travel between sites during the working day.

One point shall be awarded where the applicant satisfies the conditions set out above and, in addition:

- f) work schedules are communicated to workers at least 14 calendar days in advance;
- g) any subsequent change to a scheduled shift, start time, finish time or assigned site is communicated at least 48 hours in advance, except in duly justified cases of absence, emergency or force majeure.

The applicant shall maintain records of schedules and schedule changes for the duration of the contract.

Assessment and verification

In cases where points are being claimed under this optional criterion, the applicant shall provide a declaration of compliance, supported by:

- *a copy of the documented scheduling policy applicable to workers assigned to the contract;*
- *a description of the procedures used to communicate schedules and schedule changes to workers;*
- *anonymised examples of duty rosters covering at least 4 representative weeks;*

- *anonymised records, for the same period, showing schedule changes and the notice period given;*
 - *where applicable, a description of the measures used to minimise split shifts, short shifts and inter-site fragmentation of working time;*
 - *a declaration signed by a legal representative confirming that the commitments under this criterion are implemented for the contract workforce.*
- The schedule records shall be regularly updated and shall be provided upon request by the competent body in order to demonstrate ongoing compliance during the award period.*

2477 Rationale for the proposed SC1(o) criterion

2478 Indoor cleaning services are commonly delivered outside standard office hours, across multiple
 2479 sites, and under tight time constraints. In practice, this can lead to fragmented shifts, short-notice
 2480 changes, split shifts and poorly organised inter-site travel. A criterion on predictable scheduling is
 2481 therefore justified because it targets a core feature of service delivery that directly shapes workers’
 2482 daily conditions and the continuity of the service. This is consistent with the European Commission’s
 2483 framework on [socially responsible public procurement](#), which highlights decent work, social inclusion
 2484 and compliance with labour rights as legitimate procurement outcomes.

2485 Summary of changes

- No previous criterion

2487 Stakeholder feedback on new criterion SC1(o))

2488 Although no criterion on worker-adapted scheduling was included among EU Ecolabel criteria
 2489 established in Commission Decision (EU) 2018/680, several stakeholders highlighted the need for
 2490 including social aspects among the criteria in the preliminary survey.

2491 Comparison of existing ecolabels

2492 A comparison with other relevant ecolabel criteria on this criterion is provided below, together with
 2493 references to relevant criteria in those ecolabels.

2494 Table 24. Work life balance comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
Not part of the previous EU Ecolabel criteria	<p>O23 (Ethics and working environment), O24 (Sub-suppliers)</p> <p>The Nordic Swan recognizes that cleaning work is often physically demanding, with inconvenient hours and high work pressure. It sets ethical requirements to ensure fair and serious working</p>	<p>Criteria on operations. The standard requires structured, predictable cleaning schedules and periodic review, which can support routine work and potentially contribute to work-life balance. However, there are no explicit requirements for working-friendly schedules or broader</p>	<p>5.2 Cleaning service agreements. The standard supports routine work through scheduled cleaning activities and encourages (but does not require) daytime cleaning, which may support more worker-friendly schedules. There are no explicit</p>

	<p>conditions, aiming to protect employees from exploitation and poor working environments. There is an emphasis on compliance with national labor law standards and ensuring that both direct employees and sub-suppliers' staff have decent working conditions.</p>	<p>work-life balance measures.</p>	<p>requirements for work-life balance.</p>
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2495 *Source: Own elaboration*

2496 General comments

2497 The EU policy basis is particularly strong in light of [Directive \(EU\) 2019/1152 on transparent and](#)
2498 [predictable working conditions](#) ⁽⁷⁹⁾ (EC, 2019b) and the Commission's summary of the [transparent](#)
2499 [and predictable working conditions framework](#) ⁽⁸⁰⁾, which were adopted to improve working
2500 conditions through more transparent and predictable employment, particularly for workers in
2501 precarious jobs. The proposed criterion does not replicate the Directive; rather, it rewards providers
2502 that go beyond the legal minimum through longer notice periods, reduced fragmentation and better
2503 work organisation.

2504 Comparison with other relevant ecolabel schemes only reveals indirectly related requirements. The
2505 current [Nordic Swan Cleaning Services criteria](#) emphasise structured operations, training and quality
2506 management; [Green Seal](#) requires comprehensive cleaning plans and communication procedures;
2507 and [Eco Choice Aotearoa](#) requires service agreements, work instructions and quality monitoring.
2508 None appears to set explicit thresholds for advance scheduling notice, split shifts or minimum shift
2509 length. SC2 therefore builds on the management-system logic already used in existing schemes,
2510 while extending it into the social dimension.

2511

2512 Points for discussion 25 – SC1(o): Predictable and worker-adapted scheduling (up to 1 point)

2513 Stakeholders are invited to reply to the following consultation question/s:

- 2514 — [Question 68 \(Q68\)](#) - Do you agree with the addition of this new optional criterion? Should it be
2515 removed or moved to mandatory? Please, justify your answer.
- 2516 — [Question 69 \(Q69\)](#) - Do you consider the proposed criterion to be burdensome for your company? Are
2517 there specific challenges for SMEs? Please explain which aspects, if any, would be particularly
2518 challenging for your business.

⁷⁹ Directive (EU) 2019/1152 of the European Parliament and of the Council of 20 June 2019 on transparent and predictable working conditions in the European Union (OJ L 186, 11.7.2019, p. 105-121). Available at [this link](#).

⁸⁰ See: https://employment-social-affairs.ec.europa.eu/policies-and-activities/rights-work/labour-law/working-conditions/transparent-and-predictable-working-conditions_en

2519
2520

— Question 70 (Q70) - Please, provide any other comments that you deem relevant to any aspect of *SC1* criterion.

2521

2522 SC2(o): Paid training and skills development beyond mandatory training (1 point)

Existing criterion from Commission Decision (EU) 2018/680:
No existing requirement
Proposed criterion for TR1
SC2(o): Paid training and skills development beyond mandatory training (1 point)
<p>This requirement applies to cleaning staff and supervisors directly responsible for delivering the cleaning service.</p> <p>One point shall be awarded where the applicant provides each worker assigned to the contract with the rights to at least 12 hours per year of paid training that is additional to any training required by law.</p> <p>The training shall be relevant to the delivery of indoor cleaning services and options shall cover at least two of the following areas:</p> <ul style="list-style-type: none">a) ergonomic working methods and prevention of musculoskeletal disorders;b) safe, efficient and low-impact use of cleaning products, including dosing methods where relevant;c) hygiene and infection prevention procedures relevant to the premises cleaned;d) communication with clients, supervisors and building users;e) language, literacy or digital skills relevant to the service;f) career development and progression to team leader or supervisory functions. <p>All training hours claimed under this criterion shall be remunerated as working time.</p> <p><i>Assessment and verification</i></p> <p><i>In cases where a point is being claimed under this optional criterion, the applicant shall provide a declaration of compliance, supported by a copy of the general company policy for employees that enshrines this as an employee right or, provide copies of employee contract clauses that clearly state this right to remunerated training beyond the any mandatory minimum training stipulated by law.</i></p> <p><i>The training records shall be regularly updated and shall be provided upon request by the competent body in order to demonstrate ongoing compliance during the award period.</i></p>

2523 Rationale for the proposed SC2(o) criterion

2524 Training is one of the clearest social and service-quality levers available in indoor cleaning services.
2525 Service quality depends heavily on workers' understanding of site-specific procedures, safe chemical use, equipment handling, hygiene protocols, communication and ergonomics. Rewarding paid
2526 training beyond legal minimum requirements improves both worker capability and job quality and
2527

2528 aligns with the Commission’s guidance on [social procurement](#) ⁽⁸¹⁾ as a tool to create decent work
 2529 and social value in service delivery.

2530 Summary of changes

- 2531 • No previous criterion

2532 Stakeholder feedback on new criterion SC2(o))

2533 Although no criterion on paid training and skills development beyond mandatory training was
 2534 included among EU Ecolabel criteria established in Commission Decision (EU) 2018/680, several
 2535 stakeholders highlighted the need for including social aspects among the criteria in the preliminary
 2536 survey.

2537 Comparison of existing ecolabels

2538 A comparison with other relevant ecolabel criteria on this criterion is provided below, together with
 2539 references to relevant criteria in those ecolabels.

2540 Table 25. Staff training beyond mandatory training comparison on existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
Not part of the previous EU Ecolabel criteria	The Nordic swan requires staff training on criterion O22 but do not require additional training.	Criteria on training mandates initial, site- specific, and ongoing training for all employees, supporting skill development and professional growth. While career development is not explicitly mentioned, the required continuing education and professional development contribute to staff advancement.	5.5.2 Staff training. Requires initial, site- specific, and annual in- service training for all staff. Training must cover health, safety, environmental hazards, work instructions, waste management, vehicle fuel efficiency, and communication channels. Training must respect unique needs (e.g., limited English proficiency). The standard mandates comprehensive and ongoing training for all staff, supporting skill development. There is no explicit mention of career development or progression

2541 *Source: Own elaboration*

⁸¹ See: https://commission.europa.eu/funding-tenders/tools-public-buyers/social-procurement_en

2542 General comments

2543 In addition to the above-mentioned link with Commission's guidance on [social procurement](#), the
2544 broader policy link is reinforced by the [European Pillar of Social Rights](#), especially its principles on
2545 education, training and lifelong learning. The Commission's material on [skills, education and lifelong](#)
2546 [learning](#) and [upskilling pathways](#) supports the idea that training should be inclusive, accessible and
2547 linked to labour market quality. The proposed criterion remains appropriately framed as a beyond-
2548 compliance incentive rather than a direct labour-law obligation.

2549 Other relevant ecolabel schemes provide especially strong support here. [Green Seal GS-42](#) requires
2550 staff training for new hires and annual training covering safe and effective procedures. [Eco Choice](#)
2551 [Aotearoa EC-45-18](#) requires initial, site-specific and annual in-service training, records of training,
2552 and attention to needs such as limited English proficiency. The [Nordic Swan Cleaning Services](#)
2553 [criteria](#) also include staff training in environmentally friendly driving and cleaning methods. The
2554 proposed SC2 criterion therefore sits squarely within established ecolabel practice, but strengthens
2555 the social dimension by making paid skills development an explicit criterion.

2556

2557 Points for discussion 26 – SC2(o): Paid training and skills development beyond mandatory
2558 training (1 point)

2559 Stakeholders are invited to reply to the following consultation question/s:

2560 — [Question 71 \(Q71\)](#) - Do you agree with the addition of this new optional criterion? Should it be
2561 removed or moved to mandatory? Please, justify your answer.

2562 — [Question 72 \(Q72\)](#) - Do you consider the proposed criterion to be burdensome for your company? Are
2563 there specific challenges for SMEs? Please explain which aspects, if any, would be particularly
2564 challenging for your business.

2565 — [Question 73 \(Q73\)](#) - Please, provide any other comments that you deem relevant to any aspect of SC2
2566 criterion.

2567

2568 SC3(o): Worker participation and social dialogue (1 point)

Existing criterion from Commission Decision (EU) 2018/680:

No existing requirement

Proposed criterion for TR1

SC3(o): Worker participation and social dialogue (1 point)

This requirement only applies to applicants which are large enterprises in terms of numbers of full-time equivalent employees (i.e. ≥ 250 employees).

One point shall be awarded where the applicant has established a formal mechanism for worker participation in relation to the contract and implements it throughout the contract period.

The mechanism shall satisfy each of the following conditions:

- a) workers assigned to the contract, and/or their representatives where such representatives exist, are consulted at least twice per year on matters relating to work organisation, workload, occupational safety and health, training needs and service implementation;
- b) workers have the possibility to raise proposals or concerns in a structured manner, either directly or through worker representatives;
- c) the employer reviews the issues raised, documents any follow-up actions and communicates outcomes to the workers concerned within a timeframe not exceeding 30 calendar days;
- d) one responsible person or function is designated to organise consultation, record outcomes and follow up agreed actions.

The participation mechanism may include meetings, structured worker forums, representative consultations, or equivalent documented arrangements.

Assessment and verification

In cases where a point is being claimed under this optional criterion, the applicant shall provide a declaration of compliance, supported by a copy of a documented procedure describing the worker participation mechanism. The documented procedure shall include:

- *a description of the frequency of consultations, the participants involved and the topics covered.*
- *templates or anonymised examples of meeting agendas, minutes, consultation notes or worker feedback forms;*
- *a description of the procedure for follow-up and communication of outcomes to workers;*
- *identification of the person or function responsible for implementation;*
- *a declaration signed by a legal representative confirming that the participation mechanism is implemented for workers assigned to the contract.*

The worker participation records shall be regularly updated and shall be provided upon request by the competent body in order to demonstrate ongoing compliance during the award period.

2569 Rationale for the proposed SC3(o) criterion

2570 Cleaning work is often characterised by dispersed workplaces, limited visibility to supervisors, lone
 2571 working or semi-isolated work, and dependence on client-controlled premises. In this context, formal
 2572 worker participation has practical value because it gives workers a structured route to raise issues
 2573 about workload, site practices, occupational risks, training gaps and service design.

2574 Summary of changes

- 2575 • No previous criterion

2576 Stakeholder feedback on new criterion SC3(o))

2577 Although no criterion on worker participation and social dialogue was included among EU Ecolabel
 2578 criteria established in Commission Decision (EU) 2018/680, several stakeholders highlighted the
 2579 need for including social aspects among the criteria in the preliminary survey.

2580 Comparison of existing ecolabels

2581 A comparison with other relevant ecolabel criteria on this criterion is provided below, together with
 2582 references to relevant criteria in those ecolabels.

2583 Table 26. Worker participation and social dialogue comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
Not part of the previous EU Ecolabel criteria	<p>O23 (Ethics and working environment), O24 (Sub-suppliers)</p> <p>The criteria require that employees are provided with a good working environment and that their rights are protected. While there is no explicit mention of worker representatives or formal social dialogue structures, the document stresses the importance of fair conditions, employee communication, and collaboration with labor inspectorates and industry organizations to professionalize the sector and improve working conditions</p>	<p>Green Seal GS-42 requires internal procedures for staff feedback about workplace issues and external communication procedures with building management and tenants.</p>	<p>Eco Choice Aotearoa EC-45-18 requires quality monitoring and a system allowing written communication and feedback between the client and the service provider</p>

2584 *Source: Own elaboration*

2585

2586 General comments

2587 The proposal of this new criterion is consistent with the Commission's concept of [socially responsible public procurement](#) ⁽⁸²⁾, which aims to improve social outcomes through contract design and
2588 management.
2589

2590 For the cleaning sector specifically, EU-OSHA materials on [measures to prevent psychosocial risks to cleaners](#) ⁽⁸³⁾ and [managing psychosocial risks in the cleaning sector](#) ⁽⁸⁴⁾ emphasise that preven-
2591 tive measures should be based on risk assessment with the participation of cleaners, and that psy-
2592 chosocial and musculoskeletal risks are better addressed together. The SC3 proposal translates that
2593 broad policy logic into a simple, verifiable contract-level mechanism.
2594

2595 The reasons why this this criterion is only applicable to large operators is that the requirements
2596 may be too burdensome for SMES, while visibility to supervisors and difficulties to communicate
2597 issues are considered to be less important in this case.

2598 Existing ecolabel schemes support this direction indirectly as presented on Table 26. SC3 comple-
2599 ments those approaches by introducing a dedicated worker-participation mechanism focused on the
2600 workforce itself.

2601

2602 Points for discussion 27 – SC3(o): Worker participation and social dialogue (1 point)

2603 Stakeholders are invited to reply to the following consultation question/s:

2604 — [Question 74 \(Q74\)](#) - Do you agree with the addition of this new optional criterion? Should it be
2605 removed or moved to mandatory? Please, justify your answer.

2606 — [Question 75 \(Q75\)](#) - Do you consider the proposed criterion to be burdensome for your company? Do
2607 you agree with restricting its application to large companies, only, so as to avoid administrative burden
2608 for SMEs? Please explain which aspects, if any, would be particularly challenging for your business.

2609 — [Question 76 \(Q76\)](#) - Please, provide any other comments that you deem relevant to any aspect of SC3
2610 criterion.

2611

⁸² See: https://single-market-economy.ec.europa.eu/single-market/public-procurement/strategic-procurement/socially-responsible-public-procurement_en

⁸³ See: <https://osha.europa.eu/en/oshwiki/measures-prevent-psychosocial-risks-cleaners>

⁸⁴ See: <https://oshwiki.osha.europa.eu/en/themes/managing-psychosocial-risks-cleaning-sector>

2612 SC4(o): Inclusive recruitment, retention and progression measures (1 point)

Existing criterion from Commission Decision (EU) 2018/680:
No existing requirement
Proposed criterion for TR1
SC4(o): Inclusive recruitment, retention and progression measures (1 point)
<p>One point shall be awarded when the applicant implements documented measures to promote at least two of the measures listed below regarding the inclusive recruitment, retention, and progression of workers under the EU Ecolabel contract(s).</p> <ul style="list-style-type: none"> a) recruitment of persons facing barriers to labour market participation, such as long-term unemployed persons, young persons entering the labour market, older workers, migrants, refugees, persons with disabilities, or other disadvantaged groups identified in accordance with applicable national frameworks; b) adapted induction, supervision or training arrangements for workers with different linguistic, educational or professional backgrounds; c) mentoring, onboarding or other retention measures designed to support newly recruited workers during their first months of employment; d) measures to support progression to more skilled or better remunerated functions, including access to supervisory training or internal promotion pathways; e) measures to support equality and non-discrimination in recruitment, training access, task allocation and career progression. <p><i>Assessment and verification</i></p> <p><i>To qualify for a point, the applicant shall demonstrate that at least one of the selected measures is applied in a structured manner to workers assigned to the EU Ecolabel indoor cleaning service contract(s) and is supported by documented procedures or implementation records.</i></p> <p><i>In cases where a point is being claimed under this optional criterion, the applicant shall provide a declaration of compliance, supported by a copy of the relevant policy or documented procedure covering inclusive recruitment, retention, equality or progression. A description of measures implemented under at least two of the areas listed above shall be included.</i></p> <p><i>The policy and/or documented procedures shall be regularly updated and shall be provided upon request by the competent body in order to demonstrate ongoing compliance during the award period.</i></p>

2613 Rationale for the proposed SC4(o) criterion

2614 Indoor cleaning services are often an important entry point to the labour market for groups that
 2615 may face barriers to employment, including migrants, people with limited formal qualifications,
 2616 older workers and people returning to work. A criterion on inclusive recruitment, retention and

2617 progression is therefore justified because it recognises not only access to jobs, but also the quality
 2618 and sustainability of those jobs.

2619 Summary of changes

- 2620 • No previous criterion

2621 Stakeholder feedback on new criterion SC4(o))

2622 Although no criterion on inclusive recruitment, retention and progression measures was included
 2623 among EU Ecolabel criteria established in Commission Decision (EU) 2018/680, several stakeholders
 2624 highlighted the need for including social aspects among the criteria in the preliminary survey.

2625 Comparison of existing ecolabels

2626 A comparison with other relevant ecolabel criteria on this criterion is provided below, together with
 2627 references to relevant criteria in those ecolabels.

2628 Table 27. Inclusive recruitment, retention and progression measures comparison of existing ecolabels

Existing EU Ecolabel (Decision (EU) 2018/680)	Nordic Swan (076)	Green Seal 42	NZ Eco Choice (45-18)
Not part of the previous EU Ecolabel criteria	O23 (Ethics and working environment), O24 (Sub- suppliers) The document acknowledges the vulnerability of cleaning staff, many of whom have a foreign background and limited education. It requires ethical employment practices and fair working conditions for all, including sub- suppliers. The focus is on general protection from exploitation and ensuring all employees have access to training and a safe, fair workplace.	The standard requires training to be accessible and adapted to diverse employee needs, supporting inclusion. Training must be matched to the needs of each employee, including those with limited English proficiency, physical challenges, or learning disabilities.	The standard requires training to be accessible to staff with unique needs, supporting inclusion.

2629 *Source: Own elaboration*

2630

2631

2632 General comments

2633 This proposal is directly relevant to the Commission's framework on [socially responsible public](#)
2634 [procurement](#) ⁽⁸⁵⁾, which identifies promoting employment opportunities, social inclusion and better
2635 conditions for disadvantaged people as legitimate procurement objectives.

2636 The policy link is also consistent with the [European Pillar of Social Rights](#), particularly its principles
2637 on equal opportunities, active support for employment and education, training, and lifelong learning.
2638 The SC4 proposal is intentionally flexible. Instead of imposing rigid quotas, it rewards documented
2639 measures in recruitment, onboarding, retention and progression that can be adapted to national la-
2640 bour-market conditions.

2641 Other ecolabels provide useful supporting logic. The [NZ Eco Choice](#) explicitly requires training to take
2642 account of unique needs, such as limited English proficiency, while [Green Seal GS-42](#) requires sub-
2643 stantial training for new hires and site-specific work. The [Nordic Swan background document for](#)
2644 [Cleaning Services 076](#) also situates cleaning services in a structured service-management frame-
2645 work. The proposed criterion extends this logic from training and procedures into broader inclusion
2646 and retention policy, making more explicit a social value that is only implicit in existing schemes.

2647 Points for discussion 28 – SC4(o): Inclusive recruitment, retention and progression measures (1
2648 point)

2649 Stakeholders are invited to reply to the following consultation question/s:

2650 — [Question 77 \(Q77\)](#) - Do you agree with the addition of this new optional criterion? Should it be
2651 removed or moved to mandatory? Please, justify your answer.

2652 — [Question 78 \(Q78\)](#) - Do you consider the proposed criterion to be burdensome for your company? Are
2653 there specific challenges for SMEs? Please explain which aspects, if any, would be particularly
2654 challenging for your business.

2655 — [Question 79 \(Q79\)](#) - Please, provide any other comments that you deem relevant to any aspect of SC4
2656 criterion.

⁸⁵ See: https://single-market-economy.ec.europa.eu/single-market/public-procurement/strategic-procurement/socially-responsible-public-procurement_en

6. Conclusions

This first Technical Report (TR1) provides the technical basis for revising the EU Ecolabel criteria for indoor cleaning services, established in [Commission Decision \(EU\) 2018/680](#) ⁽⁸⁶⁾ (EC, 2018) and supports the forthcoming stakeholder consultation and policy decision-making process. It addresses the requirements of the [EU Ecolabel Regulation \(EC\) 66/2010](#) ⁽⁸⁷⁾ (EC, 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 and/or any of them should be revised, amended, removed or added. TR1 provides elements supporting the revised EU Ecolabel criteria for indoor cleaning services.

The analysis confirms that clearly defined scope and alignment with NACE codes are essential for ensuring transparency and regulatory compliance in the indoor cleaning services sector. Public procurement is shifting from lowest-price to "best value" approaches that prioritize sustainability criteria, driving change across the EU. A restructured criteria framework has been proposed, organized into four themes, namely "General Management," "Procurement of consumables," "Energy and climate," and "Social criteria". Each theme includes mandatory requirements and optional criteria evaluated through a score system. The proposals are grounded in comprehensive analysis of the policy and legal context, market trends, technical assessments, environmental impacts, and stakeholder feedback. More ambitious requirements for ecolabelled products in procurement, targeted SME support, and measurable environmental and social performance indicators are recommended.

This TR1 provides a first proposal of revised criteria and sets the scene for the 1st Ad-Hoc Working Group (AHWG) meeting, scheduled for 30th of April 2026, and the following stakeholder consultation. Continued research and stakeholder engagement will be crucial to refine policy measures, address emerging challenges like microplastic emissions, and ensure the sector benefits from innovation in automation and digital tools.

⁸⁶ Commission Decision (EU) 2018/680 of 2 May 2018 establishing EU Ecolabel criteria for indoor cleaning services (OJ L 114, 4.5.2018, p. 22–38). Available at [this link](#).

⁸⁷ EU Ecolabel Regulation. 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](#).

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List of abbreviations and definitions

Abbreviations	Definitions
CAM	Criteri Ambientali Minimi (Minimum Environmental Criteria, Italy)
CLP	Classification, Labelling and Packaging (of substances and mixtures, EU Regulation)
CMR	Carcinogenic, mutagenic, or toxic to reproduction
CSRD	Corporate Sustainability Reporting Directive
dBA	A weighted decibels
EC	European Commission
EEA	European Environment Agency
EMAS	Eco-Management and Audit Scheme
EMS	Environmental Management System
EN	European Norm (European Standard)
EPREL	European Product Registry for Energy Labelling
EPD	Environmental Product Declaration
EPRS	European Parliamentary Research Service
EU	European Union
GHS	Globally Harmonised System of Classification and Labelling of Chemicals
GPP	Green Public Procurement
ICS	Indoor Cleaning Services
IEC	International Electrotechnical Commission
ILO	International Labour Organization
INSTA	Nordic Standard (used in cleaning sector, e.g. INSTA 800)

Abbreviations	Definitions
ISO	International Organization for Standardization
JRC	Joint Research Centre (European Commission)
kg	Kilogram
LCA	Life Cycle Assessment
LCI	Life Cycle Inventory
MECO	Materials, Energy, Chemicals, Other (analysis method used by Nordic Swan)
NACE	Nomenclature statistique des activités économiques dans la Communauté européenne
NGO	Non-Governmental Organization
EU-OSHA	European Agency for Safety and Health at Work
OSH	Occupational Safety and Health
PBT	Persistent, bioaccumulative and toxic
PCR	Product Category Rules
PEF	Product Environmental Footprint
PFAS	Poly- and perfluoroalkyl substances
PMT	Persistent, mobile and toxic
PPWR	Packaging and Packaging Waste Regulation
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
RTU	Ready-to-use
RTU _{year}	sum of the total volume of products in ready to use form (for PC8 criterion calculation)
SDG	Sustainable Development Goal

Abbreviations	Definitions
SME	Small and Medium-sized Enterprise
SVHC	Substance of Very High Concern
SWOT	Strengths, Weaknesses, Opportunities, Threats
Total _{year}	total volume of products used per year (for PC8 criterion calculation)
UND _{share}	Share of liquid undiluted hard surface cleaning products (for PC8 criterion calculation)
VOC	Volatile organic compound(s)

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Annexes

Annex I: Proposed GM1 (m) templates

Template A: Environmental Policy (minimum content)

Administrative details	
Organisation name	
Registered address / main office	
Scope of this policy (services/sites/contracts covered by the EU Ecolabel licence)	
Date of issue	
Review date (at least annual)	
Approved by (top management)	
Role responsible for implementation (Environmental Coordinator / equivalent)	
Contact details (email/phone)	
Company environmental policy on:	
Policy area	Details(*)
Compliance with applicable environmental legislation and contractual requirements	
Prevention of pollution	
Use of cleaning products (including selection and dosing)	
Supply of consumables (including hand-soap, paper towells and toilet paper)	
Waste prevention and sorting (including packaging)	
Water use (including laundering and any on-site generated solutions where applicable)	
Energy use (including equipment and laundering where applicable)	
Transport (vehicles and mobility associated with service delivery, where applicable)	
Textiles and accessories (durability, laundering and end-of-life management)	
Other (specify):	

* some areas may have no corresponding company policy, or just be limited to behaviour at the applicant premises. In either case, this should be explained in the relevant field in the template.

Signature (top management): _____ Date: ____ / ____ / ____

Template B: Environmental action programme

Note 1: The number and nature of objectives in the environmental action programme are free for applicants to define according to their own company strategies and goals.

Note 2: indicator target values for a given objective should be quantitative.

Note 3: Example objectives that provide a strong synergy with requirements in other EU Ecolabel criteria include: (i) achieve a high share of ecolabelled products in cleaning product purchasing; (ii) achieve a high share of microfibre products in textile cleaning accessory purchasing; (iii) achieve a high share of ecolabelled products in mophead and cloth purchasing; (iv) annual fuel consumption of company vehicle fleet per km travelled; (v) achieve a use of professional washing machine appliances and/or energy efficient household washing machine appliances at the service provider premises for washing of cloths, mopheads and uniforms.

Objective	Environmental aspect addressed and related policy area	Measures/ actions to be implemented	Responsible person/ role	Indicator	Target value

Add rows as needed (at least three)

The action programme can be updated periodically as company strategies evolve.

Template C: Annual internal environmental evaluation

This report shall be prepared at least annually and approved by management.

Organisation name	
Reporting year / period	
Scope covered (services/sites/contracts)	
Prepared by (name/role)	
Date prepared	
Approved by (name/role)	
Date approved	

Key performance indicators (should match to reporting requirements for EU Ecolabel criteria and, if different, to any additional indicators stated in the action plan on template B)

Indicator	Result (current year)	Target / result for previous year	Remarks	Corrective action (if target not met)
Share of ecolabelled cleaning products (as defined in M1)* ¹				
Total cleaning products purchased (ready-to-use equivalent, where applicable) * ¹				
Training completion rate for required environmental topics* ¹				
Waste sorting followed at cleaning sites where applicable/controlled by applicant* ¹				
Transport energy use (if applicable) (e.g., kWh/100 km or L fuel/year)* ¹				

Note*¹: illustrative examples

The remarks section should aim to explain why the result for the current year is as it was (positive or negative). It could be due to changes in suppliers, in requirements relating to new customers or job sites and so on. It should also flag any particular actions to be taken to ensure continued good performance or improve current performance. If actions are planned, any associated roles and responsibilities should be designated here too.

Signature (management): _____ Date: ____ / ____ / ____

Template D: Client feedback and complaint log (environmental performance)

The template below is suggested for customer complaints, but other structures can also be used if they cover the same basic elements. For the sake of criterion GM1 (m), no separate log for complaints of an environmental nature need to be provided to the customer. Instead, it should be possible to filter out the complaints that are relevant to environmental performance based on whether “Yes” has been selected in the “Relevant to environmental impact?”.

Record feedback and complaints that relate to environmental performance (e.g. chemical use, waste sorting, odours/fragrances, spill events, client sustainability requirements).

Date received	Client / site	Feedback / complaint reference	Issue description	Relevant to environmental impact? (Y/N)	Action taken / corrective action	Closure date / status

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