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J R C T E C H N I C A L R E P O R T S

Development of the EU Ecolabel Criteria for Indoor Cleaning Services

Technical report and criteria areas proposal
for the 2nd AHWG meeting

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Terms and definitions

Cleaning	'Cleaning' has the meaning defined by the EU Detergents Regulation (EU/259/2012) and is 'the process by which an undesirable deposit is dislodged from a substrate or from within a substrate and brought into a state of solution or dispersion' (Article 2(3)).
Routine	'Routine' refers to regular activities that are performed at least once a month. With regard to the present project, any cleaning activity, with the exception of window cleaning, that is performed less frequently than once a month is considered to be out of scope.
Cleaning services	'Cleaning services' refers to the commercial activities that generate revenue by maintaining the cleanliness of a defined space or object at a desirable level. The focus of this project is on routine indoor cleaning activities, including the cleaning of commercial (e.g. offices, shopping centres, hotels), institutional and other publically accessible buildings (e.g. libraries, schools, museums, churches, hospitals).
Outsourced auxiliary services and products	'Outsourced auxiliary services and products' refers to services and products that are not directly used in the provision of cleaning services but are used to support the everyday business operations of the cleaning service provider (e.g. external laundry services, laundry detergents, dishwasher detergents).
Floor cleaning	'Floor cleaning' refers to the routine cleaning of indoor floors in commercial and public spaces using either dry or wet methods.
Sanitary cleaning	'Sanitary cleaning' refers to the routine maintenance of the cleanliness of sanitary facilities. Key cleaning tasks include the cleaning of sinks, toilet bowls and urinals, washing floors, emptying rubbish and sanitary bins and cleaning vertical surfaces. Disinfection and sanitization activities are excluded.
Sanitization	The process of destroying <i>most</i> micro-organisms and removing dirt and germs through the use of chemicals and/or heat – this does not include disinfection practices and products that remove <i>nearly all</i> micro-organisms and germs and sterilization techniques that eliminate <i>all</i> micro-organisms and germs.
Glass/window cleaning	'Glass/window cleaning' refers to the routine* cleaning of glass surfaces, including mirrors. With regard to the present project, glass/window cleaning is limited to the cleaning of indoor glass and window areas that can be accessed without the use of any specialised equipment or machines. *As window cleaning might be performed less frequently than on a monthly basis, the term "routine" is used here in a more flexible way than how it is defined above. Any window cleaning activities corresponding to the definition and that are performed regularly under an indoor cleaning service contract are considered to fall within the scope of this EU Ecolabel.
Surface cleaning	'Surface cleaning' refers to the routine cleaning of vertical surfaces, furniture (e.g. desks, chairs) and desk equipment (e.g. phones).
Routine cleaning products	'Routine cleaning products' refers to cleaning products that are used on a routine basis in cleaning. With regard to this project, the scope of 'routine cleaning products' includes but is not limited to all the products within the scope of the EU Ecolabel for hard surface cleaning products (previously EU Ecolabel for all-purpose cleaners and sanitary cleaners).

Specialised cleaning products	'Specialised cleaning products' refers to cleaning products that are used for specialised and/or non-routine cleaning tasks (e.g. paint remover).
Cleaning accessories	'Cleaning accessories' refers to reusable cleaning goods such as cloths, mops and water buckets.
Cleaning supplies	'Cleaning supplies' refers to disposable goods used for cleaning, such as wipes, paper towels (used for cleaning, not hand drying) and disposable vinyl gloves.
Consumable goods	'Consumables' refers to consumable products that are used by the end users of the facility, such as toilet paper, paper towels (used for hand drying, not cleaning) and hand soap.
Cleaning power equipment	'Cleaning power equipment' refers to tools used in cleaning that require energy to operate.
Standard	'Standard' refers to a "document established by consensus and approved by a recognised body that provides, for common and repeated use, rules, guidelines or characteristics for activities or their results, aimed at the achievement of the optimum degree of order in a given context (ISO/IEC Guide 2, 2004)
Public buildings	'Public buildings' refers to buildings such as schools and other educational establishments, places of public worship, and other buildings destined for public use, benefit, and access (e.g. hospital, library). For hospitals, only publicly accessible areas are considered within the scope of this EU Ecolabel, such as waiting and office areas. All areas that require disinfection and sterilisation are considered out of scope.
EU Ecolabel	'EU Ecolabel' refers to a voluntary ecolabelling award scheme developed and managed by The European Commission intended to promote products and services with a reduced environmental impact during their entire life cycle and to provide consumers with accurate, non-deceptive, science-based information on the environmental impact of products or services. There are three types of voluntary labels identified by ISO with the EU Ecolabel falling under the Type I category.
Green Public Procurement	'Green Public Procurement (GPP)' is defined in the Communication (COM (2008) 400) as "Public procurement for a better environment" - "a process whereby public authorities seek to procure goods, services and works with a reduced environmental impact throughout their life cycle when compared to goods, services and works with the same primary function that would otherwise be procured."
Type I Ecolabel	'Type I Ecolabel' is defined by the ISO 14024 standard as a voluntary multi-criteria-based, third party program that awards a license that authorises the use of environmental labels on products indicating overall environmental preferability of a product within a particular product category based on life cycle considerations.
Domestic Buildings	'Domestic buildings', in the context of the present project, refers to structures or units of residential accommodation occupied by individuals, families and other households and include households where care is provided for residents (e.g. homes, flats, dormitories, care homes).

Executive Summary

The objective of this project is to develop criterion for a new EU Ecolabel for cleaning services, and to revise the existing EU Green Public Procurement (GPP) criteria for cleaning services. The existing EU GPP Cleaning Services criteria are available in the link <http://ec.europa.eu/environment/gpp/pdf/criteria/cleaning.pdf>.

This report is the second draft of the technical report on the EU Ecolabel for cleaning services to substantiate the updated proposal for criteria of the EU Ecolabel. The first proposal of the criteria was presented to stakeholders at the first ad-hoc working group meeting held on 22nd January 2015. Stakeholder feedback was collected after the meeting and have been reflected in this report. The recommendations for the revision of EU GPP criteria for cleaning services are available in a separate technical report available on the JRC website <http://susproc.jrc.ec.europa.eu/cleaning%20services/stakeholders.html>.

This report consists of the following sections:

1. Introduction outlining the purpose of the report and a brief summary of the Preliminary Report which provides background to this document.
2. Product group specifications, namely for the product group name, definition and scope. Additionally, it is included the specifications for the EU Ecolabel applicants and the proposed general assessment and verification process.
3. Proposed criteria for the EU Ecolabel for indoor cleaning services with supporting rationale and questions to address to stakeholders.

1 Introduction

The following document is the second draft of the Technical Report for the development of the EU Ecolabel criteria for indoor cleaning services. The revision of EU GPP criteria for cleaning services is within the scope of this project and the recommendations are captured in a separate report. The GPP technical report is available on the JRC website <http://susproc.jrc.ec.europa.eu/cleaning%20services/stakeholders.html>.

The study has been carried out by the Joint Research Centre's Institute for Prospective Technological Studies (JRC-IPTS) with technical support from Anthesis UK. The work is being developed for the European Commission's Directorate General for the Environment.

1.1 Aim of this report

The main purpose of this document is to propose new EU Ecolabel criteria based on technical analysis, including reviews of Life Cycle Assessments (LCA) assessing the environmental impacts of services covered by the scope of the product group and other scientific sources, and input received from stakeholders, both before and after the 1st Ad-Hoc Working Group (AHWG) meeting. This document is complemented by the Preliminary Report, which summarises previous tasks on scope and legislative analysis (Chapter 1), market analysis (Chapter 2), technical analysis (Chapter 3) as well as improvement potential (Chapter 4) to support the development of the criteria.

Chapter 1 presents the main findings of the Preliminary Report, the links between the environmental hotspots and the proposed criteria as well as the main changes between the first and second versions of the Technical Report.

Chapter 2 details the proposed scope and definitions for the product group, "indoor cleaning services" as well as an update on the name to be given to the product group. Each proposed criteria area and criterion is outlined in Chapter 3, including assessment and verification requirements. The rationale for each criterion is based on information collected in the initial phases of the project (Preliminary Report) and feedback received from stakeholders following the 1st AHWG meeting. The Annex A contains a table showcasing the comments received on the first draft of the Technical Report and indications as to how they were incorporated in the present document.

1.2 Summary of the Preliminary Report on Cleaning Services

This section provides the proposal for the product group definition and scope as well as a summary of the market, technical and environmental evidence developed in the previous stages of the project that underpin the development of the EU Ecolabel and EU GPP criteria for cleaning services. All information detailed in the Preliminary Report can be found at <http://susproc.jrc.ec.europa.eu/cleaning%20services/stakeholders.html>

1.2.1 Market analysis

A market analysis on cleaning services was undertaken to assess market trends, initiatives or innovations to support the development of the EU Ecolabel. Key findings included:

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- The total estimated turnover of the cleaning service industry for 2010 was €81 billion for EU-27 (Eurostat, 2010). Services within scope (offices, schools and leisure organisations, windows and reception areas) constitute approximately €38 billion (47% of total turnover).
 - The five largest markets for professional cleaning services are Germany, France, Italy, UK and Spain.
 - Office cleaning dominates, representing 50% of turnover. However, the value of office cleaning has decreased by 8% since 1997, with an equivalent increase in specialised and related cleaning services.
 - The cleaning industry structure in Europe is characterised by a large proportion of very small enterprises. 202 000 enterprises in Europe, of which 75% employ fewer than 10 people (Eurostat, 2010, EFCI, 2012). Large enterprises that employ over 500 people only constitute 1.5% of the total (EFCI, 2012).
 - The estimated consumption volume of professional cleaning products for the EU28, Norway and Switzerland is estimated at 590 000 tonnes of product per year (A.I.S.E, 2014), with an estimated value of €886 million (Afidamp, 2014).
 - No specific data was available on the sales of sustainable cleaning products or services. However, the number of signatories to charters (e.g. AISE Sustainable Cleaning Charter) or voluntary schemes (e.g. EU Ecolabel, Nordic Swan) indicates that there is a market and interest for sustainable products and services.
 - No accurate data exists on cleaning equipment use. However, anecdotal evidence from stakeholders suggests the volume of equipment sales is considerably smaller than product sales as they have a longer lifespan.
 - It is estimated that the total value of cleaning supplies production in the EU28, Norway and Switzerland is €572 million, with over 75% of the value related to floor cleaning (Afidamp, 2014).
 - Key features and drivers in the cleaning service sector include the expansion of outsourcing; cost-led contracting and over-representation of part-time (and very short part-time) employment. The sector is also particularly sensitive to wage regulations due to high labour intensity.
 - Competition on price has forced cleaning services to invest in new technologies to offer efficiency and cost reduction.
 - Sustainable practices in the cleaning service industry are driven by resource and cost saving opportunities, government policies, voluntary standards and market demand.

1.2.2 Key environmental and social hotspots and improvement potential

Environmental and social impacts associated with all types of cleaning services were investigated in the technical and environmental analysis included in the Preliminary Report. Environmental hotspots for cleaning service components (i.e. cleaning products, supplies and accessories), cleaning operations/power equipment, road transport and operational management were identified and are summarised in Table 1.

Table 1: Main environmental hotspots of cleaning services

Cleaning service components	Environmental hotspots
Cleaning products, supplies and accessories	Cleaning product formulation (raw materials) Packaging of cleaning products Raw material use, manufacturing and end-of-life of disposable cleaning supplies
Cleaning operations/power equipment	Energy and water consumption in the use phase of cleaning products and power equipment
Road transport	Energy consumption and air emissions of road transport
Operational management	Wastewater discharge related to the use of cleaning products Waste treatment (solid and liquid waste sorting and collection)

Several social impact considerations were identified:

- **Wage regulation** – As a labour cost intensive industry, wage regulations and policies have a direct impact on the work and quality of life of cleaning service employees.
- **Cost-led contracting** – High pressures on costs are imposed on the cleaning service provider by clients, which can drive down profit margins and affect service quality. However, the EU Ecolabel for cleaning services might not be able to address cost-led contracting directly as it is a market issue rather than an operational one.
- **Health risks** – Employees in the cleaning service industry have increased health risks due to exposure to chemicals.
- **Staff training** – Adequate staff training can significantly improve the efficiency and environmental performance of cleaning services. Staff training can lead to practices that reduce the environmental impact of the services and also reduce the exposure of workers to health risks.

Potential improvements to cleaning services were identified in the Preliminary Report, and have been used as the basis for the development of the EU Ecolabel criteria.

Table 2 summarises the links between the proposed criteria areas, criteria and the environmental and social hotspots.

Table 2: Proposed EU Ecolabel criteria areas and criterion for indoor cleaning services

EU Ecolabel criteria areas	Criterion	Supporting evidence to environmental and social hotspots
Cleaning product, supplies and accessories	Criterion M1: Use of cleaning products with lower environmental impact	<p>Source: European Commission Joint Research Centre (2014). Other supporting evidence: ADEME (2010); Ècosi (2012); Consorzio Soligena (2011); A.I.S.E (2014); Koehler & Wildbolz (2009).</p> <p>The ingredients of cleaning products are important contributors to environmental impacts linked to cleaning services. Of all ingredients, the major part of the environmental impacts is caused by the surfactant ethoxylated alcohol, which is commonly found in general purpose cleaners and sanitary cleaners (Kapur et al., 2012). Surfactants can be of mixed origins, i.e. both oleo chemical origin (palm and coconut resources) and petrochemical, which has an effect on both natural land transformation and agricultural land occupation. For the impacts related to ozone depletion and metal depletion, the ingredient ethylene glycol diethylether causes the largest share of the environmental impact.</p> <p>Hotspots addressed: Cleaning product formulation (raw materials), Packaging of cleaning products</p>
	Criterion O2: Use of cleaning supplies and accessories with lower environmental impact	<p>Source: (ADEME, 2010)</p> <p>The manufacturing process of the gauze fibres contributes about 75% to the depletion of abiotic resources impact category for office floor cleaning (both cleaning equipment and activities).</p> <p>Raw material extraction and the manufacturing of bin bags contribute to more than 20% of the impact associated with three categories (depletion of natural resources, total energy consumption and water consumption) as this type of product is disposable and used in high volumes in cleaning services.</p> <p>Hotspots addressed: Raw material extraction, manufacturing and end-of-life of disposable cleaning supplies</p>
	Criterion O1: Use of concentrated undiluted cleaning products	<p>Source: European Commission Joint Research Centre (2014), AISE (2014), Kapur (2012)</p> <p>Water makes up a large portion of cleaning products (up to 95% of window cleaners) and therefore its transport makes up a large portion of the transport impacts associated to cleaning products. The use of undiluted products can reduce these impacts but this can be accentuated by using concentrated undiluted products for which the water content is even lower.</p> <p>The selected LCA studies confirmed that primary product packaging is a key environmental hotspot for cleaning products. For conventional general purpose cleaners, primary packaging can amount up to 40% of the climate change impact but a concentrated undiluted product can provide the same number of uses with a lower amount of packaging, thus lowering the associated environmental impacts.</p> <p>Hotspots addressed: Packaging of cleaning products, transportation</p>

	Criterion M3: Use of microfiber products	<p>Source: ADEME (2010)</p> <p>The manufacturing process of the gauze fibres contributes about 75% to the depletion of abiotic resources impact category for office floor cleaning (both cleaning equipment and activities).</p> <p>The manufacture of cotton cloths has a significant impact across 4 indicators (for water consumption, acidification, creation of tropospheric ozone and destruction of the ozone layer).</p> <p>Hotspots addressed: Raw material extraction, manufacturing and end-of-life of disposable cleaning supplies, water consumption</p>
Cleaning operations/ power equipment	Criterion M2: Cleaning dosage products	<p>Source: Koehler and Wildbolz (2009), European Commission Joint Research Centre (2014)</p> <p>Environmental impacts related to the formulation of products and their manufacturing can be reduced by encouraging users to only apply correct product dosages and avoid overdosing. Sensitivity analysis of LCA results has shown that overdosing products has impacts on the climate changes, agricultural land occupation, natural land transformation and fossil depletion but also contributes an unnecessary chemical loads to water ways.</p>
	Criterion O3: energy efficiency for vacuum cleaners	<p>Main source: European Commission (2009)</p> <p>Other supporting evidence: Arqum (2012); ADEME (2010); Consorzio Soligena (2011);</p> <p>For powered cleaning equipment, mainly floor cleaning machines (e.g. vacuum cleaners, rotary floor machines), the use phase dominates the lifecycle impacts of the product. Most of the impacts are associated with the consumption of energy. The use phase of cleaning equipment accounts for over 90% of energy and GHG emissions; and over 87% of the acidification impact.</p> <p>Hotspots addressed: Energy in the use phase of cleaning products and power equipment</p>
Operational management	Criterion M5: Staff training	Hotspots addressed: overall service practices. Focus on environmental practices
	Criterion M7: Environmental management measures and practices	Hotspots addressed: overall environmental management practices
	Criterion O4: EMAS registration, ISO 14001 certification of the service provider	Hotspots addressed: overall environmental management practices

	Criterion 05: solid waste sorting and disposal	Hotspots addressed: Waste treatment (solid and liquid waste sorting and collection)
	Criterion 06: Quality management	Hotspots addressed: overall management practices. Cleaning quality procedures
Social	Criterion M6: wage policy	Hotspots addressed: social issues
Other services	Criterion 07: vehicle fleet owned or leased by the applicant	<p><i>Source: Stakeholder interview, Nordic Swan (2014)</i></p> <p>The transportation of cleaning products from cleaning service companies to cleaning sites has been identified as a significant source of environmental impacts, due to the weight of liquid products. As people play an important role in cleaning services, their transport is also a significant contributor to transportation impacts.</p> <p>Hotspots addressed: Energy consumption and air emissions of road transport</p>
	Criterion 08: Efficiency of laundry washing machines owned by the applicant	Hotspots addressed: Water and energy consumption
	Criterion M4: Consumable goods	<p><i>Source: ADEME(2010), Technical report on Rinse-Off Cosmetics, Paper Products</i></p> <p>The manufacture of paper towels and other consumable goods is a significant impact for terrestrial ecotoxicity. Although not discussed in detail by the report, this relates to the resources used during the production process.</p> <p>Hotspots addressed: Cleaning goods auxiliary to the cleaning service provision</p>
	Criterion 09: Outsourced auxiliary services and products	Hotspots addressed: Products and services auxiliary to the cleaning service provision

1.2.3 EU Ecolabel and the Eco-Management Audit Scheme (EMAS)

The EU Ecolabel and the Eco-Management Audit Scheme (EMAS) are voluntary policy tools with different goals and frameworks. The EU Ecolabel acknowledges the best environmentally performing products and services on the market and EMAS recognises companies and organisations that have put in place an advanced environmental management system.

EMAS allows organisations to evaluate, report, and improve their environmental performance. Those companies that wish to participate in EMAS develop an environmental management system (EMS) and commit to continuously improve their environmental performance. They also have to regularly publish an environmental statement highlighting their progress. EMAS registration ensures that the EMS implemented by an organisation is verified by a third party, and focusses on the actions under the direct control of the company as well as actions on which it has a considerable influence. EMAS does not set targets or benchmarks for environmental goals; however, Sectoral Reference Documents are available or under development for certain economic sectors, e.g. tourism. These documents contain the description of best practices in improvement of environmental performance, as well as indicators and benchmarks to monitor the progress achieved. They aim to provide guidance and inspiration to companies on how to improve their environmental performance. EMAS-registered organisations from the sectors where Sectoral Reference Documents are available have to take these documents into account, but there is no obligation for EMAS-registered organisations to follow the best practices or achieve any benchmark.

On the other hand, the EU Ecolabel is awarded to the 10-20% best performing products or services on the market that can show that they reduce environmental impacts along the life cycle stages. Within this proposal for the EU Ecolabel for Cleaning Services, specific requirements are set for the provision of services and the related use of products and equipment. The identified thresholds constitute pass and fail requirements for awarding the EU Ecolabel. The EU Ecolabel is awarded after a third party verification.

In summary, the award of the EU Ecolabel recognises a very high level of environmental performance achieved by certain products or services provided by a company. On the other hand, EMAS registration proves that a company is committed to manage and improve its environmental performance by using a structured framework for considering its most relevant environmental impacts, monitoring, reporting publicly and continuously improving its environmental performance, and, potentially, achieving the best performance thanks to the voluntary implementation of best practices.

The two voluntary frameworks can thus be effectively used together and, moreover, be complementary: the EU Ecolabel as the tool to communicate to the market that a certain service or product achieves a very high environmental performance and EMAS as the process to improve environmental performance at the organisation level.

The proposal for the EU Ecolabel criteria for the service group of Cleaning Services is an example of how the two voluntary frameworks can complement each other. Criterion M7: Environmental management measures and practices and Criterion O4: EMAS registration, ISO 14001 certification of the service provider (new criterion) show the synergies between the EU Ecolabel criteria and EMAS. As part of a mandatory requirement, M7, the company is required to have implemented the basic requirements of an Environmental Management System. As

part of an optional requirement (Criterion O4), the company is required to provide evidence of EMAS registration or ISO 14001 certification. These two criteria help ensure that there is a company-wide awareness of environmental issues and the rest of the criteria set performance thresholds that are specific to the cleaning line that is looking to be awarded the EU Ecolabel and include aspects such as the use of cleaning products, supplies and accessories, use of microfiber cloths and the use of concentrated cleaning products, supplies.

1.3 Main changes between 1st and 2nd Technical Report proposals for criteria

The present 2nd Technical Report focuses on the main criteria areas, and the linked environmental and social hotspots, previously identified in the 1st Technical Report, namely: **cleaning products, supplies and accessories, cleaning operations/power equipment, road transport, operational management** and **social**.

A major change proposed concerns the structure of the criteria and the introduction of a point system that should allow for more flexibility for applicants. Stakeholders expressed strong interest in a point system as there is much variability in the cleaning services delivered and the market availability of products and services used in the provision of cleaning services within the EU.

The criteria are now split into two categories, **mandatory** and **optional**. All the optional criteria are assigned points. Applicants must fulfil all the mandatory criteria and can choose which aspects covered by the optional criteria they want to give priority to.

The current proposal adds a **new optional criterion for quality management** (criterion O6). This was identified as a relevant area to tackle during the 1st AHWG meeting to ensure that the EU Ecolabel services provided cover quality aspects on the service provision.

This proposal also covers **consumable goods** (criterion M4) that may be provided as part of a contract by the cleaning company to their clients. The supply of such consumable goods was shortly addressed in in the 1st Technical Report (criterion 2). However, this proposal dedicates a separate criterion to these products. A clear distinction is made between consumable goods (e.g. toilet paper) and accessories (e.g. cloths and mops) as the first ones may be eventually used in the service provision but are not specifically used to clean.

Outsourced auxiliary services and products are also more thoroughly covered in this proposal, as these types of services and products may play an important role in the provision of cleaning services. The 1st Technical Report regarded only laundry services (criterion 8 in the 1st Technical Report) and staff uniforms (criterion 11 in the 1st Technical Report). This proposals aims to cover a wider number of services and products that may assist to reduce the impact of the cleaning services provided.

The criterion on **environmental management measures and practices** (criterion 14 in the 1st Technical Report) is now split into two criteria, one mandatory and one optional that is part of the point system. It is proposed that the mandatory criterion (criterion M7) covers the basic requirements for an environmental management system, with the most important measures and practices listed as part of the requirements. It is also proposed that an optional requirement (criterion O4) covers the implementation of a third party verifiable

environmental management system according to the EMAS scheme and /or to the certification standard ISO 14001.

In order to limit the length of the criteria document, multiple criteria are proposed to be **merged or removed**. These, and the rationale behind the merging or removal, are detailed below.

Criterion on recycled content in disposable cleaning supplies

The first Technical Report proposed the draft of a criterion requiring the use cleaning accessories and supplies containing recycled plastic. This proposal was made in response to the preliminary findings that highlighted the environmental benefits of using plastics with a recycled content and the fact that the extraction of raw materials and the manufacture of cleaning supplies, especially disposable plastic supplies such as bin bags and gloves, were identified as environmental hotspots for cleaning services.

Some stakeholders suggested that bin bags should be the main focus of this criterion as it would be difficult to verify the content of recycled material in other products. Moreover, some suggested that ISO Type I ecolabelled bin bags should be considered as having fulfilled the criterion in order to facilitate the verification and assessment. Further evidence showed that some Ecolabel schemes require a minimum percentage of post-consumer recycled content (defined as the percentage of recycled plastics - post-consumer material - in the finished products (e.g. Blue Angel requires at least 80 % for bags)), although it is unclear how many, if any, bin bags are ecolabelled under these schemes. A stakeholder also suggested that the scope of this criterion should be extended to the use of biodegradable bin bags. In order to meet this criterion, companies would have to test the biodegradability of products or purchase products which have already been guaranteed by a recognised scheme. This could result in additional costs and burdens for applicants. Overall, there appears to be a lack of market availability for ecolabelled bin bags and thus it is not proposed to consider them in any of the criteria. Further discussion and research results can be found in the rationale for Criterion O2.

Due to concerns linked to health and safety implications and their availability, it is proposed to not further consider the use of disposable gloves containing recycled plastics. Disposable plastic gloves are used for sanitary cleaning or in areas where requirements in health and safety prevail, therefore it is particularly important that the quality of these gloves is not compromised and little information is available on the influence on quality of the inclusion of recycled plastic in such products.

Criterion on purchase of more durable and reusable cleaning accessories and supplies

The use of single-use cleaning supplies has been identified as an environmental hotspot for cleaning services as they require more raw materials to make and generate more waste (EC JRC, 2014d). The objective of this criterion was to encourage applicants to favour cleaning accessories (e.g. cleaning cloths and mops, gloves) that have a longer lifetime and are reusable. Nevertheless, stakeholder consultation yielded that single-use gloves are sometimes required for health and safety purposes (e.g. to limit skin contact with detergents, hazardous waste and germs). In the proposed text, no criterion states requirements on the use of reusable gloves but it is proposed that staff receive information on the topic during staff training.

Criterion on room temperature water in cleaning product dilution

This was a potential criterion for discussion in the first proposal of criteria. The majority of the stakeholder feedback agreed that the content of this criterion should be integrated in the staff training.

LCA studies and early stakeholder feedback suggested that heated water is commonly used for diluting cleaning products and the Preliminary Report for the revision of the EU Ecolabel of all-purpose and sanitary cleaners (EC JRC, 2014) suggests that the use of hot water for product dilution and rinsing is an environmental hotspot due to the energy used to heat the water. Stakeholder feedback collected at a later date suggested that cold or room water is recommended by most manufacturers in the field of industrial surface cleaning. Higher water temperature would enhance solubility but it seems not to always enhance cleaning efficiency sufficiently and as such, it is recommended that cleaning service providers should instruct their staff to use the water temperature recommended by product manufacturers, which is often room temperature water.

Feedback from the 1st AHWG meeting and further engagement with industry stakeholders suggest that using room temperature water for cleaning product dilution is now a common practice and thus a specific criterion in the EU Ecolabel is not required. Moreover, the verification is not easily feasible outside of on-site visits. This criterion is therefore proposed to be removed and the use of room temperature water in cleaning product dilution is now covered in the criterion for staff training.

Criterion on waste water discharge

This criterion was proposed to ensure that waste water is discharged in appropriate channels and is treated in water treatment plants. The majority of the stakeholder feedback agreed that this criterion should be integrated in the staff training.

Wastewater discharge in inappropriate channels was identified as an environmental hotspot due to its ecotoxicity and eutrophication impacts. During the preliminary research stakeholders suggested that wastewater is sometimes wrongly discharged into inappropriate channels (e.g. storm water drains) which could lead to the pollution of water sources and eutrophication. Follow-up stakeholder consultation yielded that the content of this criterion is important but that the proposed format was not suited. Cleaning companies have no control over the disposal facilities provided at clients' sites, potentially making this criterion difficult to implement, but also verify.

To avoid discharge in inappropriate channels, many stakeholders suggested that wastewater disposal should be included in the staff training criterion. This is in line with the previous proposal, which already referred to the importance of training staff to identify suitable wastewater disposal methods. It is proposed that wastewater disposal is covered in the staff training. The removal of this criterion will therefore not result in lowered environmental impact.

Criterion on labour standards

This criterion was proposed to require that fundamental principles and rights at work (as described in the International Labour Organisational (ILO) Core Labour Standards) were met.

Most of the stakeholder comments agreed that the cleaning service industry as a whole has significant issues on social performance. However, the majority of the stakeholder feedback suggests that the ILO standard is not entirely relevant to the European market and the requirement may cause unnecessary burdens. This criterion is therefore removed.

2 Product group specifications

2.1 Proposal for product group name, definition and scope

Proposed scope and definition:

The product group "*indoor cleaning services*" comprises: the provision of routine professional cleaning services, performed indoors in commercial, institutional and other publically accessible buildings as well as domestic residences. Areas where cleaning services are performed may include, but are not limited to, office areas, sanitary facilities, such as toilets and sinks, and publically accessible hospital areas, such as, corridors, waiting and break rooms.

It shall comprise window cleaning when it is performed on indoor or outdoor glass and window areas that can be accessed without the use of any specialised equipment or machines.

This product group shall not comprise disinfection activities or cleaning activities taking place on production sites.

In the framework of this Decision, 'routine' refers to regular activities that are performed at least once a month, with the exception of window cleaning, where 'routine' refers to regular activities that may be performed less frequently (at least once every three months).

Introduction

The first proposal for a product scope and definition was based among others on market data, a review of environmental schemes, legislation, standards and a stakeholder consultation questionnaire.

EFCI data from 2010 (EFCI, 2012) highlighted that office cleaning represents the biggest market share (50%) of professional cleaning services, followed by cleaning services performed in locations that often require specialised cleaning such as industrial sites (10%) and hospitals (7%). Domestic cleaning currently does not represent a significant market share. A breakdown of market segment data for cleaning services also showed that indoor cleaning represents the bulk of the market share. The review of the main tasks performed in indoor cleaning showed that several cleaning tasks take place routinely in order to keep an indoor space (building) clean, with floor cleaning and sanitary cleaning being among the most frequent cleaning operations. No information was found indicating that professional cleaning services performed indoor in domestic residences differ from those performed in offices and institutional buildings.

A review of the existing ecolabelling schemes, standards, statistics and regulations showed that their scope for the product group "cleaning services" generally includes all indoor cleaning activities in commercial (e.g. offices, shopping centres, hotels), public, and institutional (e.g. libraries, schools, museums) buildings – performed on a regular basis (as detailed in Section 1.3.1. of the Preliminary Report). Nevertheless it should be noted that some ecolabels, such as the Good Environmental Choice Australia Standard and the Nordic Swan, also cover domestic cleaning alongside the cleaning of commercial, public and institutional buildings (Table 4, Chapter 1 of the Preliminary Report).

A stakeholder consultation took place at the beginning of the project and several remarks were received on the shape the definition and scope of the product group should take. A number of stakeholders requested domestic buildings to be included within the scope, as is currently the practice in some other ecolabelling schemes. Moreover, some stakeholders called for "sanitisation operations" to be included but with the term meaning "the cleaning of washrooms, bathrooms and toilets", which in the scope of this work is referred to as "sanitary cleaning" (see Terms and definitions). Stakeholder feedback also suggested the inclusion of glass/window cleaning and surface cleaning as part of the tasks routinely carried out in indoor cleaning of buildings.

In respect to what should be considered out of scope, activities that are non-routine (exceptional), require special cleaning products or machinery were found to be more of a niche market. These activities include industrial cleaning (e.g. environmental remediation, manufacturing process cleaning); disinfection and sanitisation; special cleaning services (e.g. carpet shampooing, upholstery cleaning, or mould remediation services) and sanitation services (e.g. sewer sanitation, cleaning after accidents/disasters, and removal of graffiti).

The name of the product group throughout the first portion of the project was kept as "Cleaning Services" as the scope and definition were not finalised and it was in line with the name of similar product groups in other ecolabels. Stakeholders were consulted during the 1st AHWG meeting on the need to have a more specific name to highlight the scope of the EU Ecolabel.

Table 3 summarises the activities and operations carried out by cleaning service providers that would fall within the scope of Cleaning Services as proposed for the 1st AHWG meeting.

Table 3: Cleaning activities, components and operations falling in the scope for cleaning services

Cleaning services activities		Operations
Floor cleaning	Key cleaning activities:	Hard floor - vacuuming and washing; carpets - vacuuming
	Cleaning products	General purpose cleaners (align with the Hard Surface Cleaning Products product group)
	Cleaning power equipment	Commercial upright vacuum cleaners, carpet extractors, rotary floor machines, wet pick-up machines
	Cleaning accessories and supplies	Floor pads, wet mops, bucket, trolleys, brooms, brush, plastic shovel, plastic brush, vacuum bag
Sanitary cleaning	Key cleaning activities:	Cleaning sinks, toilet bowls and urinals, washing floor, emptying rubbish and sanitary bins, cleaning vertical surfaces
	Cleaning products	Sanitary cleaners including toilet cleaners (various forms) and cleaners with limescale removal function

Cleaning services activities		Operations
	Cleaning power equipment	Restroom cleaning machines; pressure washers
	Cleaning accessories and supplies	Waste handling equipment (carts/receptacles), gloves, wipes, sponges, scouring pads
Glass/windows cleaning	Key cleaning activities:	Cleaning of internal windows, glass and mirrors
	Cleaning products	All-purpose cleaners; glass/window cleaners; window washing concentrate
	Cleaning power equipment	N/A (manual cleaning only)
	Cleaning accessories and supplies	Reusable gloves; disposable gloves; water buckets; cloths rags and paper towels; sprayer bottle
Surface cleaning	Key cleaning activities:	Dusting and washing surfaces and furniture; maintenance of office and communication equipment; cleaning of contact points: handles, switches and phones; washing waste bins, wiping windowsills, dusting table legs and chairs
	Cleaning products	All-purpose cleaners
	Cleaning power equipment	N/A (manual cleaning only)
	Cleaning accessories and supplies	Dusters; mops; disposable wipes

N/A – not applicable

Relevant stakeholder comments and further research after 1st AHWG meeting

Stakeholders have expressed concerns on the following issues:

- Who can apply – stakeholder comments highlighted that the scope of the applicant was not clear in the first draft of the technical report. It was not clear who will be able to apply for the EU Ecolabel - a company or a service line/department within a company.
- Cleaning company size variation – stakeholders pointed out that cleaning companies can vary a lot in size and it was suggested that the criteria should be drafted in such a way that would not put undue burden on small companies with limited resources.
- The scope of the cleaning products included in Criterion 1 (as numbered in the 1st Technical Report – corresponds to Criterion M1 in this report) – stakeholders stated that some cleaning products that were not included in the scope of this criterion could be used in cleaning services, for example hand dishwashing detergents, dishwasher detergents and laundry detergents.
- Definition of terms – stakeholders requested the clarification of a number of key terms used in the report, such as "routine", "window cleaning" and "sanitisation".

Proposed changes

The following key changes are proposed in this 2nd draft of the Technical Report in terms of name, scope and definition of the product group:

- Product/service group name - the name of an EU Ecolabel should reflect the scope of the EU Ecolabel while remaining as concise as possible. "Indoor cleaning services" is proposed to replace "cleaning services" as it reflects that only indoor activities are covered and it also implicitly indicates that only routine tasks are covered, as these represent the bulk of the cleaning activities performed indoors.
- Scope and definition - the text indicating the scope and definition of the product group have been reworked in order to clarify the boundaries, for example by including illustrative examples and a definition of the word "routine". The scope for 'window cleaning' under this EU Ecolabel is proposed to be restricted to indoor and outdoor glass or window surface areas that can be reached from the floor and without the use of equipment (e.g. ladders). Window cleaning at heights is deemed specialised (requires special equipment and training) and falls under the jurisdiction of additional EU regulations (European Council Directive 2001/45/EC concerning minimum safety and health requirements for the use of equipment for work at height (the Temporary Work at Height Directive or TWAHD)). Moreover, auxiliary products and services that may be used by the cleaning company in order to support the delivery of cleaning services, such as laundry services, can be considered essential and are proposed to be covered by the criteria. Other services or products provided by the cleaning service company staff but that do not contribute directly to the routine maintenance of cleanliness of an indoor space are considered out of scope and are not proposed to be covered by the criteria.

2.2 Proposed specification for EU Ecolabel applicants

Proposed text specifying what can carry the EU Ecolabel

For the purpose of this Decision a company providing a professional cleaning service that falls within the definition for the product group "indoor cleaning services", as part of its business portfolio, can apply for this service to be awarded the EU Ecolabel.

Any other cleaning services provided by the company that fall outside of the scope will not be covered under the EU Ecolabel license.

The service awarded the EU Ecolabel is required to have separate financial profit centre in order to facilitate verification of compliance with the criteria.

Introduction

No applicant specification was proposed prior the 1st Ad-Hoc Working Group meeting but stakeholder feedback highlighted that such information should be clearly stated in the EU Ecolabel decision text.

Relevant stakeholder comments and further research after 1st AHWG meeting

During the 1st AHWG meeting, several stakeholders raised the issue of who would be able to apply for the EU Ecolabel (e.g. whole companies, departments, single contracts) and how the verification process would work – questioning what would happen in the case where a company offers multiple services with some of them not falling under the scope of the EU Ecolabel.

After a review of other ecolabel schemes (e.g. Green Seal, Australian Ecolabel Program, Nordic Swan) covering cleaning services, it was found that the most common defined scope for label applicants falls at a service line level (Table 4).

Table 4: Applicant specification of other Ecolabel schemes

Ecolabel	Applicant specification
Nordic Ecolabelling of Cleaning services	<p>Enterprises offering 'standard cleaning' can be Nordic Ecolabelled. 'Standard cleaning' means tasks that are necessary in order to keep an indoor space clean: regular and periodic cleaning covering maintenance of floors, collection of waste etc. are included in these tasks. In this document "standard cleaning" is referred to simply as cleaning.</p> <p>The ecolabel applies to the service as a whole – in other words a service provider cannot for example restrict the sale of Nordic Ecolabelled cleaning to certain customers while selling non-Ecolabelled services to other customers. Nevertheless, service providers may divide the service up into separate financial profit centres (e.g. where a cleaning business is divided up internally into departments, each of which produces its own accounts, such as regional departments or departments based on types of customers). In this case, the name of the profit centre(s) to which the application relates must be stated on the application.</p>

The New Zealand Ecolabelling Trust Licence Criteria for Cleaning Services	An Environmental Choice licence is not an endorsement for the cleaning company or provider itself, but applies specifically to individual cleaning contracts that the cleaning provider enters into that meet the requirements of this specification.
The Australian Ecolabel Program Good Environmental Choice Australia Standard Cleaning Services	Certification under this Standard applies only to the cleaning service of the organisation seeking certification. The label must not be associated with goods (e.g. cleaning products) or with other services excluded by the scope that are provided by the organisation, or as part of advertising material for those goods or services.

Based on these findings, it is proposed that if a company provides a professional cleaning service as part of their business portfolio and that service is covered by a separate profit centre, they can apply for that individual service to be awarded with the EU Ecolabel. Other cleaning services provided by the business that fall outside the scope of the EU Ecolabel or do not meet the requirements of the EU Ecolabel will not be covered under the EU Ecolabel license. If a company has multiple service lines (for instance in different locations) that provide services that meet EU Ecolabel requirements, the company may apply for the EU Ecolabel for all of these service lines at the same time, instead of applying for each separately. No indications are proposed to be given on the use in advertisement of the EU Ecolabel and that it should not be used in a misleading manner (i.e. to give clients the impression that an entire company has been awarded the EU Ecolabel instead of a single cleaning service) as these aspects are covered by Articles 9.2 and 10.1 of the EU Ecolabel Regulation.

When approached for feedback on this proposal, potential applicants for the EU Ecolabel (cleaning companies) and license holders of other ecolabelling schemes (e.g. Nordic Swan) stated they consider it feasible to clearly separate service lines providing ecolabelled cleaning services from their other services. Thus, this confirms that the proposed approach is applicable in the real world.

Proposed changes

A clarification text is proposed to be added to the Decision text about who can apply for the EU Ecolabel. A more explicit explanation is also proposed to be added to the User Manual at a later stage.

2.3 Proposed assessment and verification process

Proposed assessment and verification

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), as appropriate.

Where appropriate, test methods and standards other than those indicated for each criterion may be used if the Competent Body assessing the application accepts their equivalence.

Competent Bodies shall preferentially recognise documentation and certifications which are issued by bodies accredited according to the relevant harmonised standard for bodies certifying products, processes and services.

Where appropriate, Competent Bodies may require supporting documentation and may carry out independent verifications.

Competent Bodies shall carry out an on-site inspection at the applicant's premises and at least one on-site inspection of the cleaning service being provided at a client's premises.

Introduction

The EU Ecolabel for cleaning services faces unique challenges on the assessment and verification of applications as no products are being manufactured that could be assessed, but rather services are provided year-round and performed at the premises of multiple clients. An assessment and verification process was not proposed in the 1st Technical Report and stakeholders expressed the need to clarify what this process would be.

Relevant stakeholder comments and further research after 1st AHWG meeting

The key challenges and the proposed solutions are detailed below:

a) Cleaning is a contract-based service, not a product

The assessment and verification processes and requirements for the EU Ecolabel of a product can be rigid because the subject of the assessment is an object with a standardised composition and production procedure. Cleaning services are contract-based and the way the service is provided can vary between contracts and clients, complicating the establishment of the assessment and verification procedures. Indeed, contractual requirements on the use of cleaning products and the delivery of cleaning services are predominately determined by contractors.

One option for assessing the overall provision of services is for the Competent Bodies to take a multiple sample approach for on-site inspections with the number of on-site inspections increasing with the number of contracts provided by the prospective EU Ecolabel service line. As a starting point though, it is proposed that Competent Bodies shall carry out an on-site inspection at the applicant's premises to verify the provided documentation and the functioning of the company and at least one on-site visit to a client's premises during the provision of cleaning services in order to verify requirements such as the provision of dosing

apparatus and that the appropriate products are used. A list of recommended points to verify during each on-site inspection will be included in the User Manual. As cleaning companies often provide services for multiple contracts, it is recommended that CBs schedule multiple on-site visits as part of market surveillance.

b) Multiple criteria require on-site inspections to verify self-declarations

Multiple criteria, for example Criterion M2 on Cleaning Product Dosage, use declaration of compliance from the company and documents provided by the company to staff as part of the verification process. In order to verify that these documents are available to all staff and that they are familiar with their contents, on-site visits are necessary.

c) Third party certification

Some criteria can be fulfilled by using, as a means of compliance, third party certification schemes. Wherever possible, examples of such schemes have been listed and the Competent Bodies can also accept equivalent certificates from other schemes.

Proposed changes

The 1st Technical Report did not address this issue. The proposed text summarises the basics of the assessment and verification procedures and indicates the requirements in terms of on-site visits.

2.4 Proposal for the point system

The criteria proposed in this 2nd Technical Report are divided into *mandatory* and *optional* criteria. The *mandatory* criteria represent the core of the cleaning service practices and tackle the main environmental hotspots identified. The *optional* criteria will allow applicants to choose which aspects to focus on and provide flexibility when dealing with situations where trade-offs can be expected. Details on the reasoning behind the separation of mandatory and optional criteria can be found below. Annex B demonstrates the method used for assigning points to the optional criteria set and Annex C lists the points allocated. Details on the point system structure are described below.

Proposed point system structure (maximum of 23 points are available for applicants)

(1) In order to be awarded the EU Ecolabel under Regulation (EC) No 66/2010, for a service falling within the product group 'indoor cleaning services', a cleaning service shall fulfil all of the following requirements:

- (a) it shall fall within the product group "indoor cleaning services";
- (b) it shall comply with the mandatory criteria set as well as the related assessment and verification requirements;
- (c) it shall comply with a sufficient number of the optional criteria set in order to acquire the requisite number of points as referred to in paragraphs 2 and 3.

(2) For the purposes of paragraph 1(c), the applicant shall score **at least 6 points** for the main service.

(3) The total score required referred to in paragraph 2 shall be increased by 1 point for each of the following additional services. These apply, if the applicant makes use of them to support the main service provision:

- Vehicle fleet owned or leased by the applicant
- Laundry washing machines owned by the applicant
- Outsourced auxiliary services and products

Introduction

During and following the 1st AHWG meeting, stakeholders expressed strong interest for a point system to be developed in order to offer more flexibility for applicants as there is much variability in the services delivered and market availability of products and services used in the provision of cleaning services. Other ecolabelling schemes (e.g. Nordic Swan) rely on such an approach to offer this flexibility to applicants, as well as other services within the EU Ecolabel scheme such as Tourist Accommodation and Camp Site services.

Relevant stakeholder comments and further research after 1st AHWG meeting

Several motivations were brought forward by stakeholders to justify the need for considering the set of criteria based on a point system:

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- *Differences in operation* – stakeholder interviews and on-site visits have shown that the operations of different cleaning service providers can vary significantly. Cleaning companies vary in size and cleaning practices offered and only including prescriptive mandatory criteria might bring unfair disadvantages on certain applicants, for example potential applicants only catering to small contracts would function differently than those only catering to large office buildings.
 - *Differences in market availability* for ecolabelled products and services– one of the goals of this EU Ecolabel is to promote the use of sustainable products and services and the use of ecolabelled products and services is encouraged. However, the availability of ecolabelled products and services varies throughout the EU, for example ecolabelled laundry services can only be found in limited countries and ecolabelled cloths and mops are not yet widely available in all EU-28 countries.

Structure of point system

The criteria set for the EU Ecolabel of Indoor Cleaning Services is proposed to be divided into two sections: mandatory and optional criteria. This approach is already in use in the EU Ecolabel for Tourism Accommodation and Camp Sites services and is common in other ecolabel schemes that cover cleaning services (e.g. Nordic Swan). Such an approach offers greater flexibility to applicants and can be adapted to different current practices that vary greatly, especially in a wide territory such as Europe.

Mandatory criteria, as their name indicates, must all be fulfilled by the applicant. These criteria ensure that a base line is met in terms of environmental performance by the cleaning service. The method used to identify the mandatory criteria from the overall set of criteria is detailed in the section below.

After a first screening to identify the set of mandatory criteria, each optional criterion is assigned a score and a certain number of points must be reached by the applicant in order to be awarded with the EU Ecolabel. Optional criteria aim to raise the environmental performance of cleaning services to excellence while still maintaining the necessary flexibility required to take into account the great variability of how cleaning services are provided..

Points are attributed by making a distinction between aspects that are directly related to the provision of cleaning services and other aspects that are used to support a cleaning service provider's business operations but are not directly related to the cleaning service operations.

A maximum of 23 points can be scored with the proposed set of optional criteria.

These are divided as follow: Optional criteria – main service (maximum of 16 points) and Optional Criteria – additional aspects (maximum of 7 points).

- **Identification of the set of mandatory criteria**

The first step in the implementation of a point system was the assessment of the requirements in all the criteria and their division into mandatory and optional groups. This was achieved through a consideration of the specificities of this particular product group and the methodology used for the establishment of a point system in another product group – the EU Ecolabel for Tourism Accommodation and Camp Sites services. The parameters considered

for a qualitative evaluation included expected environmental improvements and the technical and economic feasibility of each criterion, as described below:

Environmental improvement. The EU Ecolabel Regulation states that criteria should focus on areas where there is great potential for reduction of negative environmental impacts. The environmental improvement potential of each criterion was evaluated on a scale from low improvement (marked as *) to a comparatively predicted high improvement (marked as ***).

Technical feasibility. Criteria may be easy or difficult to implement. The implementation feasibility was evaluated on a scale from difficult to implement (marked as *) to a comparatively easy implementation (marked as ***). A criterion was considered as difficult to implement if it requires a large amount of human resources and/or implementation time.

Economic feasibility. Criteria may require a low or high cost to implement. The implementation cost was evaluated on a scale from high investment cost (marked as *) to low investments cost (marked as ***). The rating was given based on the additional costs incurred when considering the switch from the provision of conventional cleaning services to more environmentally conscious cleaning services. A criterion was considered as having a high cost of implementation if it requires a large amount of human resources to implement (e.g. implementation of an environmental management system) or if large investments are required to purchase new equipment (e.g. more environmentally conscious vehicles). The economic feasibility of each criterion is based on information received from service providers and experts.

The whole set of proposed criteria was assigned qualitative values for each of the above mentioned aspects on environmental improvement, technical and economic feasibility.

Table 5 shows that the set of mandatory criteria (now designated as M1 to M8) were mainly identified for their comparatively larger environmental improvement potential when compared to the other criteria screened. In addition, the mandatory set of criteria chosen was also identified as having a relatively easy implementation and a low investment / cost as this ensures that companies are more likely to meet the criteria. The set of mandatory criteria identified is marked (as criterion M1 to M8) in Table 5.

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Table 5: Identification of the set of mandatory criteria

Criteria set	Environmental improvement * (low improvement) *** (high improvement)	Technical feasibility * (difficult to implement) *** (easy to implement)	Economic feasibility * (high investment/cost) *** (low investment/cost)
SET OF MANDATORY CRITERIA:			
Criterion M1: Use of cleaning products with lower environmental impact			
(a) EU Ecolabel and other ISO Type I ecolabel products	***	***	***
(b) Harmful Substances	***	***	***
Criterion M2: Cleaning product dosage	***	***	***
Criterion M3: Use of microfiber products	***	***	***
Criterion M4: Consumable goods			
a) at least 30% hand Soaps	**	***	***
(b) at least 50% paper towels and tissues	**	***	***
(c) at least 50% toilet paper	**	***	***
Criterion M5: Staff training	***	***	***
Criterion M6: Wage policy ^{a)}	---	---	---
Criterion M7: Environmental management measures and practices	***	***	***
Criterion M8: Solid waste sorting and disposal at the applicant premises	**	***	***
SET OF OPTIONAL CRITERIA:			
Criterion: Use of concentrated undiluted cleaning products	**	**	***
Criterion: Use of cleaning supplies and accessories with lower environmental impact			
(a) at least 50% mops	*	**	***
(b) at least 50% cloths	*	**	***
Criterion: Energy efficiency for vacuum cleaners	**	**	**
Criterion: EMAS registration, ISO 14001 certification of the service provider			
(a) EMAS Registration	***	*	*
(b) Certification ISO 14001	***	*	*
(c) EMAS registration + Certification ISO 14001	***	*	*
Criterion: Solid waste sorting and disposal at the cleaning sites ^{b)}	**	**	***
Criterion: Quality management	*	*	**
Criterion: Vehicle fleet owned or leased by the applicant			
(a) at least European emission standard Euro 5	*	**	**
(b) European emission standard Euro 6	*	*	*
(c) Company transport and maintenance plan	**	**	***
Criterion: Efficiency of laundry washing machines owned by the applicant			
(a) At least 50% shall comply with at least class 'A+++'	*	**	***
(b) At least 90% shall comply with at least class 'A++'	*	**	***
Criterion: Outsourced auxiliary services and	*	*	**

products			
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- a) The criterion proposed covering social aspects does not allow to be assessed by the methodology proposed as it does not cover social aspects. It was not considered judicious to develop specific indicators for social aspects as the criteria set only includes one requirement for social issues. However, due to the importance of the social aspects within the cleaning service sector, the social criterion is proposed to be part of the mandatory criteria.
- b) technical feasibility rated as ** because while it is not difficult to sort and dispose of solid waste correctly, the execution in this case highly depends on client cooperation.

- **Methodology used to attribute points to the optional criteria**

Optional criteria aim to raise the environmental performance of a cleaning service but allow applicants to focus on specific areas that are more in line with their practices, thus providing more flexibility. Each of the optional criteria is assigned a score from 1 to 3 points, with a minimum number of points needed to be reached in order to be awarded the EU Ecolabel.

Each optional criterion was scored against the same three aspects described above (environmental improvement, technical and economic feasibility) by using a quantitative scale. For each aspect, a number (integer) between 1 and 3 was attributed. For **environmental improvements**: 1 corresponds to a low potential improvement, while 3 correspond to a high potential improvement. For **technical feasibility** 1 corresponds to a difficult implementation and 3 to an easy implementation. For **economic feasibility**, 1 represents a high investment / cost and 3 corresponds to a low investment or cost.

To obtain the final score for each criterion, relative weights were attributed to each assessment aspect, as follows: environmental improvements (50%), technical feasibility (20%) and cost (30%). The weights were assigned according to the work performed for an existing EU Ecolabel (as e.g. EU Ecolabel for Tourist Accommodation and Camp Site Services) (ANPA, 2015) and they are based on the fact that environmental improvements are at the heart of the EU Ecolabel. For technical and economic feasibility similar weights were attributed, as both contribute critically to the implementation of criteria.

Table 6 summarises the points and assigned weights used in the calculation of the scores for each of the optional criteria.

Table 6: Parameters to score criteria in the proposed point system.

Assessment parameters	Environmental improvement (Scale 1 to 3)	Technical feasibility (Scale 1 to 3)	Economic feasibility (Scale 1 to 3)
Points	1 = low improvement 3 = high improvement	1 = difficult to implement 3 = easy to implement	1 = high investment/cost 3 = low investment / cost
Assigned weights	50%	20%	30%

Annex B (Table B.1) presents the score obtained for each optional criterion by using the methodology described above and reflects the potential to reduce negative environmental impacts, while also considering the ease of implementation and the incurred investment costs.

While developing the criteria, it became apparent that multiple services/products and certain equipment can be important for the provision of cleaning services but are not used by all the cleaning services providers (e.g. external laundry services, vehicles) due to questions of availability or contract size. As environmental performance improvements are linked to these aspects, it was decided to cover them through dedicated criteria. Nevertheless, in order to reflect that they are not used by all cleaning service providers, it is proposed that they are covered by separate requirements – if an applicant for the EU Ecolabel makes use of such services/products/equipment, they should score "extra" points. Annex B (Table B.2) presents the score points for these services/products/equipment.

Overall, the applicant shall fulfil as many optional criteria as needed in order to achieve the necessary amount of points set out by the EU Ecolabel. The maximum possible amount of points that can be scored is as follows: optional criteria – 16 points and optional criteria (other services) – 7 points.

In order to qualify to be awarded with the EU Ecolabel, a service provider that does not make use of the other services/products/equipment mentioned must score **a minimum of 6 points** (40% of the overall points achievable). **The total score required shall be increased by 1 point for each of the three additional services/products/equipment used**, as indicated below in Table 7.

This means that if a cleaning service provider owns a vehicle fleet it must reach a total score of 7; if they own a vehicle fleet and have their own laundry machines, a total score of 8 points must be reached, etc. Overall, this also represents around 40% of the overall number of points achievable when the extra services are considered.

Table 7: Minimum total score for optional criteria to be achieved by an applicant in order to be awarded the EU Ecolabel for Indoor Cleaning Services.

Services	Minimum number of points to be reached
Main service	6 points
Other services (other services/products/equipment):	
Vehicle fleet owned or leased by the applicant	1 additional point
Laundry washing machines owned by the applicant	1 additional point
Outsourced auxiliary services and products	1 additional point

The final proposed attribution of points by criterion can be found in Annex C.

Proposed changes

A point system is now proposed following the comments received and the further research done on the current and best practices within the sector, together with the potential for environmental improvements and the feasibility of each proposed criterion. The criteria proposed in this 2nd Technical Report are divided into *mandatory* and *optional* criteria. The *mandatory* criteria represent the core of the cleaning service practices and contribute to the environmental hotspots identified. The *optional* criteria will allow applicants to choose which

aspects to focus on and provide flexibility when dealing with situations where trade-offs can be expected. Annex C lists the points allocated to the whole set of optional criterion.

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3 Proposal for Criteria Areas and Criterion

As described in Section 2.4, the criteria are divided into mandatory and optional criteria. All applicants must meet the mandatory criteria (if applicable) and meet enough optional criteria to fulfil the indicated minimum number of points.

3.1 Mandatory criteria

3.1.1 Criterion M1: Use of cleaning products with lower environmental impact

Criterion M1: Use of cleaning products with lower environmental impact

Only products directly related to indoor cleaning service operations are covered by this criterion. Both M1(a) and M1(b) must be fulfilled by the applicant.

M1 (a) EU Ecolabel and other ISO Type I ecolabel products

At least 50% by volume at purchase of all cleaning products used per year shall have been awarded with the EU Ecolabel for Hard Surface Cleaning Products or with another ISO Type I Ecolabel.

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 cleaning service contracts and marking which products have been awarded with the EU Ecolabel for Hard Surface Cleaning Products or another ISO Type I Ecolabel and the corresponding license numbers.

M1(b) Harmful Substances

All products that have not been awarded with the EU Ecolabel for Hard Surface Cleaning Products or another ISO Type I Ecolabel shall not be classified and/or labelled as being:

GHS Hazard Statement
H300 Fatal if swallowed
H301 Toxic if swallowed
H304 May be fatal if swallowed and enters airways
H310 Fatal in contact with skin
H311 Toxic in contact with skin
H330 Fatal if inhaled
H331 Toxic if inhaled
H340 May cause genetic defects
H341 Suspected of causing genetic defects
H350 May cause cancer
H350i May cause cancer by inhalation
H351 Suspected of causing cancer
H360F May damage fertility
H360D May damage the unborn child
H360FD May damage fertility. May damage the unborn child

H360Fd May damage fertility. Suspected of damaging the unborn child
H360Df May damage the unborn child. Suspected of damaging fertility
H361f Suspected of damaging fertility
H361d Suspected of damaging the unborn child
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.
H362 May cause harm to breast fed children
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
H400 Very toxic to aquatic life
H410 Very toxic to aquatic life with long-lasting effects
H411 Toxic to aquatic life with long-lasting effects
H412 Harmful to aquatic life with long-lasting effects
H413 May cause long-lasting harmful effects to aquatic life
H59 Hazardous to the ozone layer
EUH029 Contact with water liberates toxic gas
EUH031 Contact with acids liberates toxic gas
EUH032 Contact with acids liberates very toxic gas
EUH070 Toxic by eye contact
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
H317 May cause allergic skin reaction

Assessment and verification:

The applicant shall provide a declaration of compliance with this criterion supported by the safety data sheets for all products that that have not been awarded with the EU Ecolabel for Hard Surface Cleaning Products or another ISO Type I Ecolabel.

Introduction

The use of cleaning products has been identified as an environmental hotspot for cleaning services. For example, Kapur *et al.* (2012) highlights that cleaning products have dominant impacts on human toxicity and ecotoxicity, while ADEME (2010) concludes that the manufacturing of cleaning products is an environmental hotspot for sanitary cleaning. Thus the aim of this criterion is to reduce undesirable effects on the environment by limiting the use of cleaning products containing ingredients that are harmful to the environment and human health.

As ISO Type I ecolabels put strict limitations on the chemical composition and formulations of cleaning products, a requirement on their use can easily ensure that cleaning companies limit the chemical load resulting from their activities. In addition, such a requirement does not represent a high administrative burden on companies as these products are readily available and identifiable and companies already track which products are used and in which amounts.

Relevant stakeholder comments and further research after 1st AHWG meeting

Stakeholder feedback gathered during and following the 1st AHWG meeting was in favour of the inclusion of this criterion. The comments received following the meeting are summarised below (see Annex A: Stakeholder feedback following 1st Ad Hoc Working Group for full list of comments).

Scope and definitions

A number of comments were received requesting clarification over the type of products that should be included under this criterion. The inclusion of laundry detergents and consumable goods (e.g. hand soaps) was suggested as some of the cleaning service companies also provide these products within their contracts or use them in activities supporting the cleaning activities. However, these products have not been identified as products that directly contribute to the maintenance of cleanliness of an indoor space and it is proposed to tackle them in separate criteria. Laundry detergents are now proposed to be addressed in Criterion O9 on auxiliary services and products that support the delivery of indoor cleaning services. Consumable goods (e.g. hand soaps, paper towels) are now proposed to be addressed in Criterion M4 on consumable goods.

Other comments requested the alignment of the scope and definitions used in this criterion to the updated scope and definitions proposed for the EU Ecolabel for all-purpose cleaners and sanitary cleaners (proposed to be renamed to "Hard Surface Cleaning Products" following the 1st AHWG meeting held in January 2015 and the new product group name is used henceforth). While the scope of the EU Ecolabel for Hard Surface Cleaning Products covers the majority of products used in cleaning services, some products that do not fall under that scope are also commonly used (e.g. specialised floor cleaning products). Thus, it is proposed that this criterion's scope is not directly aligned with that of the EU Ecolabel for Hard Surface Cleaning Products but is rather limited to cleaning products that are directly related to maintaining cleanliness in cleaning services.

On a similar topic, it was suggested that natural products such as vinegar should be considered as "environmentally friendly" products in the scope of this criterion. This suggestion was also made as part of the revision work for both EU Ecolabels for Tourist Accommodation Services (TAS) and Hard Surface Cleaning Products. In the first case, it was decided that only products that have been awarded an EU Ecolabel can be considered as contributing towards the percentage of environmentally preferable products (European Commission Joint Research Centre, 2015). The revision for Hard Surface Cleaning Products is evaluating whether these types of products should be included in the scope of the product group (European Commission Joint Research Centre, 2014). It is not currently proposed to allow products that have not been awarded an EU Ecolabel or another ISO Type I ecolabel to be counted towards the percentage in Criterion M1(a).

Concerns were raised over the inclusion within the scope of this criterion of products for which ISO Type I ecolabels are not currently available, therefore making it more difficult to obtain the required threshold percentage. During the 1st AHWG meeting it was clarified that this EU Ecolabel would only apply to routine cleaning activities that mainly require products that do fall under the scope of the updated EU Ecolabel for Hard Surface Cleaning Products. Nevertheless, during discussions with cleaning service providers, it was also highlighted that some products that do not fall under the EU Ecolabel for Hard Surface Cleaning Products, such as wooden floor cleaners, may be requested by clients. Thus, it is proposed that the percentage requirement of mandatory ecolabelled products be lowered to 50%, making the fulfilling of Criterion M1(a) easier. Finally, specialised tasks such as disinfection do not fall

inside the scope of this product group and therefore the fact that the specialised products required cannot be awarded an EU Ecolabel should not cause problems as they are not expected to be used in quantities surpassing 50% of all the cleaning products used by a company that wishes to be awarded with the EU Ecolabel.

Harmful Substances

Several stakeholders expressed concern over the possible presence of harmful ingredients in the percentage of cleaning products used that would not be ecolabelled. For this reason further research was undertaken to establish how other ecolabels for cleaning services address this issue and how the presence of these ingredients might be curbed.

Both the Nordic Swan and the Australian Ecolabel Program for cleaning services use similar approaches - cleaning products that are not ecolabelled must still meet a set of requirements to ensure they are not harmful to the environment or humans. The Nordic Swan criteria require that the overall product should not be classified as a number of different hazardous codes, while the Australian Ecolabel looks at an ingredient level for hazardous classifications. The Green Seal standard only requires products to be 'environmentally preferable' with no additional details are provided within the standard document.

The existing EU GPP criteria for cleaning products and services follow the same approach used by the Australian Ecolabel Program, with criteria that exclude the use of products that contain ingredients that are classified with certain hazardous phrases. The approach taken by the existing EU GPP document and the Australian Ecolabel Program would result in a significant burden both to applicants and Competent Bodies as, before ordering products, the purchasing team within a company would be required to analyse the all the Safety Data Sheets (SDS) of products used and ensure that ingredients with specific classifications are not used. In addition, during the application process, all this information would have to be collated and supplied to Competent Bodies.

The Nordic Swan approach, which looks at the classification of the whole product rather than that of single ingredients, is much simpler for applicants and would not be as time consuming as the latter approach as most hazardous phrases are also represented using a pictogram that is easily identifiable on an SDS. As time and administrative burdens have been raised as serious concerns by stakeholders, it is proposed to adopt the approach taken by the Nordic Swan.

Analysis of the criteria for Nordic Swan, Australian Ecolabel Program and the current EU GPP for cleaning services shows that the list of banned hazardous phrases differs in all three instances. These are also different from the proposed list of hazardous phrases in the criterion on hazardous substances in the EU Ecolabel for the Hard Surface Cleaners (EC JRC, 2014). The latter offers the most comprehensive and up-to-date list of banned hazardous phrases and it is proposed to consult this list and any updates to it in establishing criterion M1(b).

The introduction of this criterion should not compromise the ability of applicants to meet both this criterion and Criterion O1 on concentrated undiluted products, meaning that concentrated undiluted products that are not labelled according to the proposed list should be available on the market. As no definitive list has emerged yet, the latest EU Ecolabel for Hard Surface Cleaning Products was used in this assessment. During consultation with producers of professional cleaning products, it was found that the most common hazard statements found

on concentrated (dilution rated <1:80) undiluted products are related to health hazards and the corrosive properties of products (e.g. H314, H315, H216). This was corroborated through the catalogue of large manufacturers – for example the Taski Sprint Emerel QS multi-purpose cleaner (Diversey, 2013), among others.

Moreover, the labels and standards mentioned above require for some harmful substances, such as EDTA, to be banned (see example of Nordic Swan and Australian Ecolabel in Table 8). Such substances are also tackled in the revision of the EU Ecolabel for Hard Surface Cleaning products. Nevertheless, it should be noted that for this criterion, the issue of ease of verification is also important as SDS are not required to carry information on the presence of many of the substances found on those lists unless they are above a certain threshold – the absence of a substance on an SDS is not the guarantee that it is not in the product. If it is required that all the cleaning products used that are not ecolabelled are free from those substances, cleaning service providers will be required to contact cleaning product manufacturers individually in order to obtain a certificate guaranteeing the absence of those substances. Oftentimes, the producers of cleaning products would have to, in turn, contact their suppliers in order to verify that the substance was never intentionally added to other ingoing substances, even in small quantities.

Table 8: Substances that cannot be present in the cleaning products used

Excluded harmful substances	Nordic Swan	Australian Ecolabel Program
Alkylphenol ethoxylates (APEOs) and derivatives	X	X
Ethylene diaminetetraacetic acid (EDTA) or its derivatives	Including Nitrilotriacetic acid (NTA) and Pentetic Acid (DPTA)	X
Reactive Chlorine compounds	X*	(over 1%)
Organochlorine compounds	X*	
Active chlorine carriers		(over 1%)
Linear alkyl benzene sulfonates	X	
Silver-nano particles	X	
Perfluorinated and polyfluorinated alkylated substances (PFAS)	X	
Methyl dibromo Gluaronitrile	X	
Optical brighteners	X	
Ingredients carrying any of the risk phrases: R42, R43, R48, R50, R51, R53, R58, R68		X

* These can be used for specific purposes such as swimming pool cleaning, but this is outside of the scope of this proposed service group

Threshold

Although comments regarding this criterion were positive, the majority agreed that the 70% threshold proposed during the 1st AHWG meeting should be lowered as stakeholders believe market availability of EU Ecolabel/other ISO Type I ecolabel products is not yet sufficient and greatly differs from country to country.

Currently no data are available concerning professional-grade hard-surface cleaning products that have been awarded the EU Ecolabel as they are covered by the same EU Ecolabel as consumer products. Data on both consumer and professional hard-surface cleaners shows that 89 producers currently propose 536 products that have been awarded the EU Ecolabel for all-purpose cleaners and sanitary cleaners (European Commission Joint Research Centre, 2014) and these are manufactured in 14 of the EU28 (+NO) countries but sold throughout Europe. It should also be noted that professional-grade products are generally ordered remotely, bought in bulk and delivered to the premises of the cleaning company or directly to client premises, therefore the presence or absence of EU Ecolabel products on store shelves is not a sign of their availability to cleaning service providers.

Other ISO Type I ecolabels for cleaning products that fall under the scope of this criterion are present on the European market. These labels and the number of products available are shown in Table 9.

Table 9: Number of ISO Type I ecolabelled cleaning products in Europe

Country	Label	No. of products
Austria	Austrian Ecolabel	110
Czech Republic	Czech Ecolabel	4
DK/NO/SE/FI	Nordic Swan	725

Source: JRC IPTS (2014), Preliminary report for the revision of ecological criteria for all-purpose cleaners and sanitary cleaners.

However, insufficient market data does not allow for an understanding on how these are spread between different types of cleaning products and how readily available professional products are on the market. Thus, a 70% threshold could potentially pose a significant barrier to companies operating in some countries. It is proposed to lower the threshold of ecolabelled products to 50% along with the inclusion of an additional criterion on harmful substances to cover all products that are not ecolabelled.

To better understand current practices, three companies providing cleaning services that are marketed as environmentally friendly were consulted regarding their use of ecolabelled products. In two cases, the interviewees responded that over 90% of cleaning products have an ISO Type I ecolabel. The remaining 10% are specialised products such as wooden floor cleaners. In both cases, they stated that the availability of such products was not an issue but both companies are localised in countries where the market for EU Ecolabel products is quite developed. The third interviewee suggested that a 50% threshold would be suitable.

Verification and Assessment

Two issues were raised with regard to the assessment and verification procedure for this criterion. Firstly, a number of stakeholders were concerned that measuring this criterion as a percentage by volume at purchase could have a detrimental effect on the environment. This

could encourage applicants to use ready-to-use ecolabelled products in order to compensate for a large amount of undiluted non-ecolabelled products and still achieve the 50% by volume threshold. This is particularly problematic on two fronts as ready-to-use products are associated with more packaging and more transport costs and undiluted products can have a higher impact on the environment if dispersed in this form given the higher concentration of active substances.

Different methods of calculation were tested to understand the impacts these would have on volumes of detergents used and the feasibility towards meeting the requirements set in this criterion and in Criterion O1 on concentrated undiluted products. The first method is that which was initially proposed in the first technical report and simply looks at the volume at purchase without taking into account dilution rates or the percentage of active substances in the product.

The second method considers the in-use volume rather than the volume at purchase. The in-use volume refers to the volume of product after the dilution recommended by the manufacturer – for ready-to-use products, this dilution rate is 1. This would be calculated using the equation below:

$$U(i) = V(i) \times D(i)$$

$$\%U_{eco} = \frac{\sum U(i_{eco})}{\sum U(i_{eco}) + \sum U(i_{non-eco})}$$

Where:

i = cleaning product,

i_{eco} = EU Ecolabel or other ISO Type I Ecolabel cleaning product

$U(i)$ = in-use volume of product i (litres)

$V(i)$ = volume of product i used (litres)

$D(i)$ = minimum dilution rate of product i , for example if the dilution ratio is 1:10, $D(i)=10$. For ready-to-use products, $D(i)=1$.

The third approach was based on the percentage of active substances in the products used and uses the following calculation method:

$$A(i) = V(i) \times AC(i)$$

$$\%AC_{eco} = \frac{\sum A(i_{eco})}{\sum A(i_{eco}) + \sum A(i_{non-eco})}$$

Where:

i = cleaning product,

i_{eco} = EU Ecolabel or other ISO Type I Ecolabel cleaning product,

$i_{non-eco}$ = non-EU Ecolabel or other ISO Type I Ecolabel cleaning product,

$AC(i)$ = % of active content in a product formulation,

$V(i)$ = total volume used of a cleaning product i ,

$\%AC_{eco}$ = percentage of active substances coming from EU Ecolabel/other Type I ecolabel cleaning products.

In order to illustrate the results obtained with the three approaches (volume at purchase, in-use volume and by active substance content), a simulation was ran to show the impact on both Criterion M1(a) and Criterion O1. The following "worst case" assumptions were made:

- only ready-to-use products can be awarded the EU Ecolabel,
- all ready-to-use products have a dilution rate of 1:1 (hypothetical 1% AC),
- all undiluted traditional products have a dilution rate of 1:50 (hypothetical 12% AC),
- all concentrated undiluted products have a minimum dilution rate of 1:80 to meet Criterion O1 (hypothetical 20% AC).

In this scenario, the percentages of AC for traditional and concentrated undiluted products are almost pro rata with their dilution rates. The percentage of AC for ready-to-use products is higher than if calculated based on dilution rates but is lower than what is found in most ready-to-use products.

Table 10 shows the *volumes at purchase* required to meet Criteria M1(a) and O1 (50% of ecolabelled products and 30% of concentrated undiluted products) using the three different calculation methods with the worst case scenario assumptions described above. Using the in-use volume approach results in a disproportionately large difference between the amount of RTU and concentrated (and traditional) undiluted products necessary to fulfil both criteria, with Criterion M1(a) being extremely difficult to fulfil. Using the active concentration percentage also results in a large amount of RTU products being bought compared to concentrated (and traditional) undiluted products. As stated before, the aim of this criterion is to encourage the use of ecolabelled products but this should not have the counter effect of discouraging the use of undiluted products. In addition, the cleaning companies would have to request the percentage of active substances for all products use from their manufacturers as this information is not required to be indicated on SDS, and this would be a very time consuming task. Thus, it is proposed to keep the current calculation method based on the volume at purchase.

Table 10: Volumes at purchase required to meet Criteria M1(a) and O1 by calculation method

	Method 1: Volume at purchase	Method 2: In-use volume	Method 3: Active substance content
Ready-to use (L)	50	50	50
Undiluted traditional (L)	20	0.4	0.6
Undiluted concentrated (L)	30	0.15	0.67

The second issue raised by stakeholders with regard to this criterion is the feasibility for cleaning companies to provide documentation and the time that would be required to compile it. Conversations with cleaning companies suggest that data on products ordered and volumes is already tracked as the purchase of such products is an important expense; using the volume at purchase method would only require companies to compile which products are ecolabelled and which ones are not. For Criterion M1(b), SDS include information on CLP classifications and companies should already be aware of these.

Professional Products

Comments were made regarding the availability of professional and specialised cleaning products and the effect this might have on the feasibility of this criterion. Firstly, it must be clarified that only routine cleaning products fall under the scope of this criterion as those are the ones that are used in routine cleaning activities, therefore products for specialty cleaning (e.g. paints removers) could not be used and would not count towards the percentage of non-ecolabelled products.

The EU Ecolabel for Hard Surface Cleaning Products (former All-purpose Cleaners and Sanitary Cleaners) has already been awarded to products intended for professional use and more will most likely be awarded as the scope of that EU Ecolabel is proposed to be extended to all types of undiluted products, potentially greatly increasing the ecolabelling opportunities for professional products. Moreover, several manufacturers of professional cleaning products have EU Ecolabel (or other ISO Type I ecolabel) product lines that are already being used by cleaning companies.

Proposed Changes

- It is proposed to separate this criterion into two parts. Part M1(a) focuses on the minimum amount of ecolabelled products that must be used in the scope of the cleaning activities. Part M1(b) covers all other non-ecolabelled products used and sets requirements to limit the presence of substances that are harmful to the environment and human health.
- It is proposed that the threshold of ecolabelled cleaning products is lowered from 70% to 50% due to varied market availability of such products across the EU-28.
- The calculation method for the percentage of ecolabelled products used is proposed to remain the same – volume at purchase for both ready-to-use and undiluted products.

3.1.2 Criterion M2: Cleaning product dosage

Criterion M2: Cleaning product dosage

Cleaning staff shall have access to dosing apparatus appropriate for the cleaning products used on each site and the corresponding user instructions.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion supported by the appropriate documentation showing the user instructions for correct dosing, as provided to the cleaning staff.

Introduction

Cleaning service providers can lower the environmental impact, as well as health and safety concerns, of cleaning products used by ensuring that all staff respect the recommended dosage.

Relevant stakeholder comments and further research after 1st AHWG meeting

During the 1st AHWG meeting the idea of having a criterion on cleaning product dosing was presented to the stakeholders and the responses were generally positive. The two main areas of concern were:

- Existing common practice – it was suggested that the provision of dosing systems is common practice as it makes sense financially - having staff use the correct dosage helps companies minimise costs.
- The provision of different types of dosing systems - requests were made for the criterion to cover both manual and automatic dosing systems. Further stakeholder interviews also suggested that it is not always economically viable to install automatic dosing system for all cleaning sites and, thus, this criterion should not be limited to automatic apparatus but also cover manual dosing tools, such as measuring cups and beakers.

Furthermore, some stakeholders proposed to cover correct dosing in the criterion on staff training. While a section on correct dosing can be found in that criterion, the provision of the dosing apparatus is not covered there.

Finally, the development of a cleaning product consumption threshold was originally considered in order to minimise the use of chemicals. Two stakeholders proposed including a criterion identical to Nordic Swan's criterion on chemical consumption while consultation with cleaning companies highlighted that limiting the amount of chemicals used is already in the interest of these companies and the calculation of the exact amount of products used per surface would be an unnecessary administrative burden for applicants.

Proposed update

It is proposed that this criterion should function as a safety net against bad practices – while most companies will meet it easily, it ensures that companies with easily avoidable bad practices are not awarded with an EU Ecolabel.

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3.1.3 Criterion M3: Use of microfiber products

Criterion M3: Use of microfiber products

Only textile cleaning accessories that are directly related to indoor cleaning services operations are covered by this criterion.

At least 50% of the textile cleaning accessories (e.g. cloths, head mops and rags) used per year shall be made of microfiber.

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 marking which textile cleaning accessories are made of microfiber used.

Introduction

This criterion aims to encourage the use of microfiber mops and cloths in order to reduce water and cleaning product consumption during cleaning activities. Water depletion, eutrophication and ecotoxicity are key environmental impacts associated with the use of water and cleaning products in cleaning services (Preliminary Report, Chapter 3).

A study conducted by the University of California Davis Medical Centre found that the use of microfiber cloths results in significant cost savings and lowered the environmental impact of cleaning activities. For example, it was found that the use of microfiber can result in a 95% reduction in water and chemical use, a 20% reduction in labour costs per day and a 60% reduction in cost over the lifetime of a mop (UNEP, 2008). The same study also showed that the use of microfiber mops might reduce costs associated with worker injuries as microfiber mops are much lighter than conventional mops and they require less cleaning solution, reducing the requirement for repeatedly lifting heavy buckets of water. These findings have been corroborated during consultation with cleaning service providers.

The Australian Sustainable Procurement Product Guide for Cleaning Services estimates that the use of reusable microfiber cloths can also lead to labour cost reductions of up to 10% for the cleaning service provider (Queensland Government Chief Procurement Office, 2010)

Relevant stakeholder comments and further research after 1st AHWG meeting

Scope and definition

In the 1st draft of the Technical Report, this criterion focused on products that "lead to reduced water and cleaning product use" but stakeholders argued that this criterion should specifically indicate that it focuses on the use of microfiber products. This would lead to greater clarity with respect to the criterion requirements and make the verification and assessment easier. In the research mentioned above, it was shown that microfiber cloths are very effective in cleaning and have lower water and chemical use requirements and the cleaning efficiency and environmental benefits are also recognised by other ecolabels, for example:

-
- Environmental Choice New Zealand has a mandatory requirement on the use of microfiber cloths;
 - The UNEP Sustainable Public Procurement scheme recommends sustainable cleaning methods and equipment to be adopted, listed the use of microfiber cloths as an example (UNEP, 2008).

Threshold

No information regarding market availability and market penetration of microfiber cloths was found. Varying opinions were stated during stakeholder interviews. In two cases, the majority (more than 90%) of cloths used by the cleaning company were microfiber cloths. In the third case, the company's use of microfiber cloths greatly depended on the client site but in some cases only microfiber cloths were used. The same company stated that overall a reasonable percentage was achievable for all client sites. Thus, it is proposed to include a 50% threshold for the amount of microfiber cloths and mops used as this would allow companies to adapt based on their needs.

Proposed Changes

- It is proposed that the name of this criterion is changed to specifically require the use of microfiber products.
- It is proposed that 50% of textile cleaning accessories (e.g. cloths, head mops and rags) used at the customer for cleaning purposes must be made of microfiber. Stakeholder consultation (cleaning service providers) has confirmed the feasibility of this threshold.

3.1.4 Criterion M4: Consumable goods

Criterion M4: Consumable goods

This criterion is only applicable if the applicant is responsible for supplying consumable goods to be used at the clients' sites in at least one contract:

M4 (a) Hand Soaps

At least 30% by volume of hand soaps supplied per year shall have been awarded with an EU Ecolabel for Rinse-off Cosmetics or another ISO type I Ecolabel.

M4 (b) Paper towels and tissues

At least 50% by number of articles or pieces of paper towels and tissues supplied per year shall have been awarded with an EU Ecolabel for Tissue Paper or another ISO type I Ecolabel.

M4 (c) Toilet paper

At least 50% by number of articles or pieces of toilet paper supplied per year shall have been awarded with an EU Ecolabel for Tissue Paper or another ISO type I Ecolabel.

Assessment and verification

The applicant shall provide annual data (commercial name and volume or number of pieces) and documentation (including relevant invoices or site inventories) indicating the consumable goods supplied and marking which products have been awarded with the EU Ecolabel or with an ISO Type I Ecolabel and the corresponding license numbers.

Introduction

Consumable goods are not used by cleaning companies as part of their cleaning activities but in some cases they are procured and supplied by these companies on behalf of their clients as part of some contracts. The consumer goods covered under this criterion include paper products (e.g. toilet paper, paper towels and tissues) and hand soap.

Relevant stakeholder comments and further research after 1st AHWG meeting

Scope

Consultation with cleaning companies confirmed that the purchase of consumable goods is part of some of their customer contracts with hand soap, toilet paper, hand towel rolls and absorbent hygiene products being the most common products supplied.

The Nordic Swan Ecolabel for cleaning services contains a requirement for a number of consumable products to be ecolabelled (see Table 11). The Green Seal standard requires that liquid hand soap, toilet tissue and facial tissue, and paper towels and napkins purchased should be "environmentally preferable" products without providing a definition of these terms. Good Environmental Choice Australia requires cleaning service companies to provide the environmental credentials when procuring liquid hand soap, toilet tissue, facial tissue, paper towels, napkins and other sanitary paper products.

Table 11: Nordic Swan requirements for consumable goods

Product Type	Ecolabel %
Drying- paper (kitchen rolls, paper towels and toilet paper)	90%
Hand towel rolls	50%
Soap	100%

From stakeholder feedback and the review of other labels, the following products appear to be the most commonly procured by cleaning companies on behalf of their clients:

- Soap
- Toilet tissue
- Facial tissue and paper towels
- Textile hand towel rolls
- Absorbent hygiene products

Some stakeholders also suggested that hand-driers should be included in the scope of this criterion. However, from consultation with cleaning companies it appears that these are not typically procured by the cleaning company but are rather the responsibility of their clients.

Threshold

In order to determine the threshold for the proposed products, the market availability of these was investigated.

There are 490 products currently holding the EU Ecolabel for Soaps and Shampoos (ECAT, May 2015) with licensed products available in all EU-28 countries but with the number of licenses varying significantly from country to country. Moreover, the ECAT data does not allow distinction between hand soaps and the other product types falling under the scope of that EU Ecolabel. Moreover, the EU Ecolabel for this product group has recently been revised and the new criteria for Rinse-off Cosmetics came into force in December 2014. License holders have one year from this date to update their license and, at the time of writing, there were no license holders under the new product group. Due to the uncertainty about the availability of EU Ecolabel soaps, it is proposed that 30% of hand soaps should carry the EU Ecolabel or another ISO Type I ecolabel.

With respect to paper products, and according to ECAT, there are nearly 3,000 products holding a license for the EU Ecolabel for tissue paper. Figure 1 shows that a large numbers of tissue paper products are licensed in some countries but many do not have any at all. The data shown in the figure does not reflect the availability on the market of these products as many appear on multiple markets. Given the lack of data on the availability of ecolabelled tissue paper in some countries, it is proposed that a 50% threshold should be set.

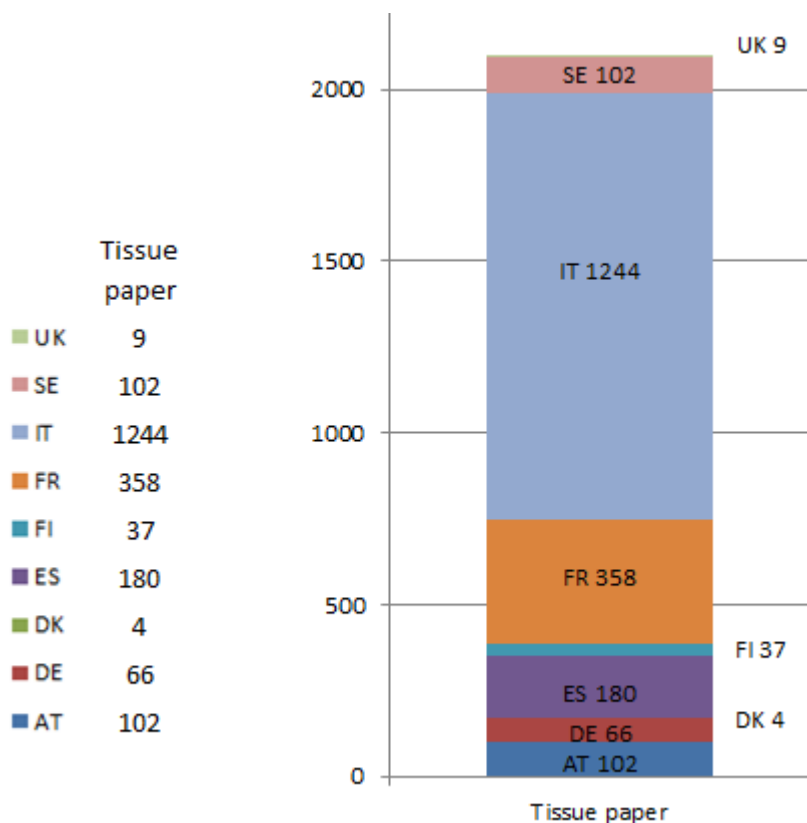


Figure 1: Split of Tissue Paper EU Ecolabel by country as of January 2014 (compiled from ECAT, 2014)

With respect to absorbent hygiene products, there are currently only three products holding an EU Ecolabel licence for this product group as the criteria only came into force in October 2014, and at the time of writing, licensed products were only available in Denmark. Thus, it is proposed to exclude absorbent hygiene products from this criterion due to low availability.

Textile hand towel rolls can be ecolabelled under the textiles product group for both the EU Ecolabel and Nordic Swan. Based on ECAT data, there are 1,162 textile products with an EU Ecolabel license, however it is not possible to understand how many of these, if any, are hand towel rolls and anecdotal evidence suggests that the number of such products is low. Given the lack of information on availability, it is proposed to exclude textile hand towel rolls from this criterion. For more information on EU Ecolabel textile products is provided in Section 3.2.2.

Finally, comments were made that cleaning service companies do not always have a choice in the type of products or brands that their clients request as part of a contract. For this reason this criterion is proposed with thresholds for the amount of ecolabelled products to be provided. This provides flexibility for the applicants while still promoting the use of ecolabelled products.

Proposed Changes

The scope of the criterion is proposed to be limited to paper products (e.g. toilet paper, paper towels and tissues) and hand soap. This is supported by a limited number of licenses for other consumable goods that can make part of the goods supplied by the services provider (as textile hand towel rolls and absorbent hygiene products).

3.1.5 Criterion M5: Staff training

Criterion M5: Staff training

The cleaning service provider shall make available information, including written procedures or manuals, and training to the cleaning staff and managers overseeing cleaning operations. In particular, staff training shall cover the following areas:

— Staff shall be made aware of what the EU Ecolabel is and are the implications for the provision of 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 how to use the appropriate dosing apparatus.

— Minimisation of the range of cleaning products used as a mean to minimise the risk of overuse and misuse of cleaning products shall be covered.

Energy saving:

— Staff shall be trained to use room temperature water for diluting products, unless otherwise specified by the product manufacturer.

— Staff shall be trained to use the appropriate cycle and temperature for both industrial and household washing machines.

Water saving:

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

Waste:

— Staff shall be trained to select appropriate durable and reusable cleaning accessories to 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 be trained to collect, separate and dispose of solid waste into the categories that can be handled separately by the local or national waste management facilities as defined by Criterion O5: Solid waste sorting and disposal. Training should include solid waste management both at the company's premises and at the cleaning sites.

— Staff shall be trained to collect and separate hazardous waste as listed in Decision 2000/532/EC and dispose appropriately as required by the local waste management authority and defined by Criterion O5: Solid waste sorting and disposal. Training should include hazardous 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 and encouraged to adopt best practices for cleaning tasks. This must include information on:

Criterion M5: Staff training

- Safety Data Sheets and handling of chemicals
- National working environment legislation
- Ergonomics and working environment
- How to remove, clean and store reusable gloves
- Road safety and eco-driving, if applicable

Adequate training shall be provided to all new staff (either permanent or temporary staff) within four weeks of starting employment.

At least once a year, staff shall be given an update on all the aspects outlined in the criterion. Although this update does not have to be a repeat of the initial training session given to all staff, it should cover all of the environmental issues listed and ensure that staff are fully aware of their responsibilities.

Assessment and verification

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

Where training courses are provided as part of national or external training schemes, certification showing participation and the content of such courses can be provided as proof of compliance as long as the topics listed in this criterion are covered in such training.

Introduction

Cleaning staff plays an important role in the delivery of cleaning service as their practices influence the final environmental footprint of the service. While the criteria on cleaning products, operations and power equipment sets standards for efficient cleaning services on the product side, this criterion aims to ensure that cleaning staff are trained to deliver efficient and effective cleaning services in order to benefit to the maximum from the environmentally preferable products.

Relevant stakeholder comments and further research after 1st AHWG meeting

Scope

Stakeholders highlighted that this criterion should detail which areas should be covered during training, information should be given as to which staff is covered by this criterion and how often they should be trained. This is essential as different companies have different policies for training staff and different countries have different legislation on this matter and offer varying levels of support (e.g. an interviewee responded that government-funded training is available for cleaning staff while another stated that no such options were

available in their country). As this kind of support isn't available in all countries, the EU Ecolabel must provide a minimum requirement for all European countries.

Nordic Swan criteria require the license holder to provide training for their personnel and have a training plan. The training plan proposed by an applicant must include indications on who is to be trained and how often, but no specific indications are stated for minimum requirements. The criterion also sets out a list of fundamental topics that should be covered and support material from European Federation of Cleaning Industries (EFCI) and UNI-Europa is provided.

The Green Seal standard for commercial and institutional cleaning services provides very detailed information on this issue. It requires all cleaning staff to be trained in addition to procurement personnel. Staff must undertake initial training, site-specific training and continued training on an annual basis. Good Environmental Choice Australia requires all staff to be trained before they can commence operation. All staff must also receive continued training at least on an annual basis.

The only other service groups for which the EU Ecolabel is available is for Tourist Accommodation Services and Campsite Services, which are being combined into a single product group. In the most recent revision of the criteria it was proposed that all new staff should be trained and that must take place within four weeks of hiring. In addition, an annual training update should also take place for all staff.

Unlike for tourist accommodation services, not all members of staff at a cleaning company or division are directly involved in the activities specified in the training. Training staff requires time and investment, and given that most European companies are SMEs, it would be excessive to require all members of staff to be involved in all required training activities. It is therefore proposed that only relevant members of staff are trained for each activity, in an approach similar to that taken by the Green Seal standard.

Finally, temporary members of staff are commonly employed in the cleaning services industry. It is proposed that they should also undergo the same approach taken for new staff members and receive adequate training within four weeks of starting employment, in order to ensure that the service provided always corresponds to high standards from an environmental point of view.

External training

One stakeholder asked whether this criterion could be met through external training. The proposed criterion specifies who, how often and the content of the training required for staff at the cleaning services company. However, this training can be carried out either internally or externally and the text of the criterion has been updated to reflect this.

Health and Safety

Stakeholders requested that more information should be included on what health and safety training should include. The following contents were proposed:

- Training on how to read Safety Data Sheets - this is particularly important for staff handling chemicals as the SDSs provide information on the safe handling of these.
- Ergonomics - correct posture is very important for health both when practicing cleaning operations and when working at a desk. This training should therefore be provided.
- Road Traffic Injuries: Where staff are given company cars and required to drive on a daily basis then training on safe and eco-driving should be provided.

Stakeholders also highlighted the importance of health and safety requirements when encouraging the use of more durable materials instead of single use items. There is a clear environmental benefit towards using items which can be used more than once, however, safety concerns and regulatory requirements should take precedence. The text of the criterion has been updated to provide greater clarity on this issue.

Waste management

Stakeholders requested that adequate waste management should be part of the training requirements. The criterion has been updated to clarify that staff should be trained to do this both at the cleaning company premise and at the customers' sites where appropriate. Additional information on waste separation has not been included as this will depend on local and national waste policies that are variable among EU members.

Chemical use minimisation and dosing

Stakeholders commented on the importance of covering chemical use minimisation and correct dosing during staff training. This latter issue was proposed in the first criteria proposal (Criterion 7, 1st Technical report) and further updated in this proposal as a mandatory criterion - Criterion M2: Cleaning product dosage. No requirements are set on the minimisation of the chemical use as no viable scientific information was found that would help set a maximum threshold for chemical use while still guaranteeing good cleaning.

Wastewater

The proposed criterion on wastewater discharge (Criterion 15, 1st Technical report) was proposed to be deleted and stakeholders agreed that this should be covered during staff training. The first proposal already included a provision on this in the staff training criterion, so no change was necessary.

Water use reduction

Stakeholders agreed with the inclusion of a water saving measure as part of staff cleaning requirements and that this should be done through an explicit requirement for the use of microfibers to be covered during training. The criterion text has been amended to reflect this.

Proposed Changes

- Following stakeholder feedback, the criterion was updated to give a clearer indication on who should participate in the required training and its frequency. It is proposed that all new staff (both permanent and temporary staff) should undergo appropriate training within four weeks of starting employment. A training update on the points listed should be provided to the staff of the EU Ecolabel cleaning service line at least once a year.
- Stakeholders and interviewees declared that in some countries national training schemes are available for members of the cleaning industry and requested that these should also count towards meeting this criterion. The text has been updated to reflect this as long as the topics in the criterion are covered in the training courses.
- Additional information on other staff training requirements was included to clarify the text of this criterion.

3.1.6 Criterion M6: Wage policy

Criterion M6: Wage policy

The applicant shall meet national or regional minimum sectorial wage standards (obtained by collective agreements). If no minimum sectorial wage agreements exist, national minimum or local minimum wage standards shall be met.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion supported by documents demonstrating compliance with relevant and recognised social responsibility standards (e.g. SA8000 and/or ISO26000)

Introduction

Stakeholders from the cleaning services sector highlighted that low wages are a significant social issue in the industry. Minimum wages exist in various forms in different EU countries but, due to competition and contractual costs, minimum wages are not always respected, leading to the exploitation of workers and unfair competition in the market place. This criterion aims to raise awareness on the minimum wage issue and to provide an incentive to tackle this problem.

Relevant stakeholder comments and further research after 1st AHWG meeting

Stakeholders were mainly concerned about two issues related to the implementation of this criterion:

- Differences in minimum wages between countries - A national minimum wage is now implemented in 22 out of 28 EU member states. The remaining countries often have minimum pay rates agreed through collective bargaining. Furthermore, for the cleaning service sector, it is common to have a sector specific minimum wage that is higher than the national minimum wage (EFCD, 2014). The complexity created by the international differences between minimum wage practices makes it difficult to develop a generic EU-level instrument (i.e. this EU Ecolabel) that can address all the policy differences.
- Difficulties in assessment and verification – Due to privacy and data protection regulations, stakeholders suggest that it would very difficult for Competent Bodies to assess and verify the implementation of national minimum sector wages or national minimum wages. The original proposal of this criterion suggested using a payslip check as a way of verifying compliance with this criterion. However, stakeholders pointed out that a certifying body, especially if it is a private or semi-public company, might not have the authorisation to check the payslips of each concerned employee as such a practice would go against data protection laws. Payslips, while being different in each country, contain sensitive information (e.g. date of birth, marital status, number of children, etc.) that is only designated for the employee in question and employees could refuse to disclose such sensitive information.

Checking for third party social responsibility standard certifications was suggested as a feasible approach by stakeholders. Relevant key standards include:

- SA8000 (Social Accountability 8000 - International Standard): voluntary standard for auditable third-party verification, encouraging organizations to develop, maintain, and apply socially acceptable practices in the workplace. Certification is only available for specific worksites.

Social issues covered by this standard include child labour, forced and compulsory labour, health and safety, freedom of association and right to collective bargaining, discrimination, disciplinary practices, working hours, **remuneration** and management systems. The following points are covered by the *Point 8* (listed below) in the standard (Remuneration) (SA8000, 2014):

(Point on remuneration): The organisation shall respect the right of personnel to a living wage and ensure that wages for a normal work week, not including overtime, shall always meet at least legal or industry minimum standards, or collective bargaining agreements (where applicable). Wages shall be sufficient to meet the basic needs of personnel and to provide some discretionary income.

- ISO 26000 (Guidance on social responsibility): international standard providing guidelines for social responsibility (SR). Its goal is to contribute to global sustainable development, by encouraging businesses and other organisations to practice social responsibility and improve their impacts on their workers, their natural environments and their communities. ISO 26000:2010 provides guidance rather than requirements, so a certification cannot be issued by a third party unlike some other ISO standards. The following point includes a guideline to be fulfilled by an organisation regarding wages (ISO 26000, 2010):

(a) An organization should provide wages and other forms of remuneration in accordance with national laws, regulations or collective agreements. An organization should pay wages at least adequate for the needs of workers and their families. In doing so, it should take into account the general level of wages in the country, the cost of living, social security benefits and the relative living standards of other social groups. It should also consider economic factors, including requirements of economic development, levels of productivity and the desirability of attaining and maintaining a high level of employment. In determining wages and working conditions that reflect these considerations, an organization should bargain collectively with its workers or their representatives, in particular trade unions, where they so wish, in accordance with national systems for collective bargaining.

Proposed changes

- Criterion text has been amended to cover minimum sector wages obtained through collective bargaining; and
- Assessment and verification through checking for compliance with third party social responsibility standards.

3.1.7 Criterion M7: Environmental management measures and practices

Criterion M7: Environmental management measures and practices

The applicant shall set the basis for an Environmental Management System by implementing the following processes:

- An **environmental policy** identifying the most relevant direct and indirect environmental impacts and the organisation's policy toward these impacts.
- A precise **action program** ensuring that the company's environmental policy is applied to the services provided. The action program shall also establish, every two years, targets on the environmental performance regarding the use of resources (e.g. reduction in cleaning products used) and actions to reduce the environmental impact. The establishment of targets and actions shall be supported by the collection of data on the use of resources and other environmental aspects (e.g. waste generation).
- An **audit process** allowing, every two years, the verification of the organisation's performances with regard to the targets defined in the action program.

The environmental policy and the performance of the organisation with regard to the targets 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 program, audit report and procedures for taking into account client comments and feedback.

Applicants registered with EMAS or certified according to ISO 14001 are considered as having fulfilled this criterion if they provide the ISO 14001 certificate and/or the EMAS registration to the Competent Body as proof of compliance with this criterion.

Introduction

The implementation of an Environmental Management Systems (EMS) is an important step toward good environmental management, as an EMS helps improve resource efficiency and reduce environmental impacts. This criterion covers the basic requirements for such a system with the most important measures and practices listed.

Relevant stakeholder comments and further research after 1st AHWG meeting

Overall stakeholders showed support for this criterion as an environmental management system provides the basis for environmental improvement at the level of the whole organisation. The comments received highlighted that the criterion text should be updated in order to better define the requirements as it would help companies that do not have an EMS set –up to put in place the most important parts of one, as listed in the criterion text. This is especially important in the case of SMEs as their limited resources can be an obstacle to getting an ISO14001 certification or EMAS registration.

UK Defra performed a study on the benefits of environmental management systems for SMEs, which is particularly relevant for the cleaning service industry (Defra, 2012). The study identified that there are significant cost saving opportunities and the return on investment period is reasonably short (3 months for certified EMS systems), however cost benefits vary significantly from case to case.

While a number of comments received from stakeholders suggested to that this criterion should be removed due to the high potential cost and time required for companies to meet this criterion, the requirement of an EMS is complementary to the other criteria proposed for the EU Ecolabel for Cleaning Services. The criterion text, as proposed, does not require the implementation of a full EMS but rather of the main aspects of one, which should limit the burdens on the company while still providing environmental benefits. Moreover, companies that take the initiative of implementing the principles of the environmental management system should be recognised.

Proposed update

The new proposed criterion text contains explicit information stating what measures the company must put in place in order to have the basis for an EMS, although not EMS is required. In order to facilitate the verification and assessment of the criterion, companies that already have a certified or registered EMS are considered as complying with the criterion.

Furthermore companies with an EMAS registration and/or ISO 14001 certification can also benefit with points awarded according to Criterion O4.

3.1.8 Criterion M8: Solid waste sorting and disposal at the applicant's premises

Criterion M8: Solid waste sorting and disposal at the applicant's premises

Only waste generated at the premises of the applicant is covered by this criterion.

Solid waste generated at the applicant's premises shall be sorted into relevant waste stream categories to be disposed in accordance with local or national waste management practices and facilities.

Assessment and verification

The applicant shall provide a declaration of compliance supported by documents indicating the different categories of solid waste collected and sorted at the applicant's premises. An indication of the different solid waste streams that can be accepted for further treatment or disposal by the local authorities, and/or by private agencies (under relevant contracts) shall also be provided.

Introduction

Handling of solid waste is a significant part of cleaning service practices. The research performed by ADEME (2010) suggests that solid waste can account for up to 91% of the freshwater ecotoxicity impact of cleaning services. This criterion aims to ensure that cleaning companies separate and dispose of relevant solid waste streams as required by the local or national waste management facilities.

Relevant stakeholder comments and further research after 1st AHWG meeting

Stakeholder comments required clarification of whether this criterion applies to the clients' or the company's premises.

For the purpose of clarity, it is proposed to split this criterion into two parts. The first part, mandatory, of the criterion relates to the requirements of relevant solid waste management at the company's premises. The cleaning company's premises are understood to be areas owned, managed or occupied by the applicant and the cleaning sites are areas the applicant is contracted to clean. The second part of this criterion is part of the optional criteria set and focuses on the relevant solid waste sorting and disposal at the clients' premises.

Other schemes also consider the issue of waste generated at the cleaning sites. Nordic Swan requires, as part of an optional criterion, all waste generated by the cleaning company (both at their premises and at the cleaning sites) to be disposed of properly. Green Seal also requires waste stream separation for waste generated as part of cleaning operations, implying this should also occur at clients' premises.

The proposed mandatory criterion on waste management in the EU Ecolabel for tourist accommodation services requires applicants to meet the local or national solid waste requirements on solid waste management. The EU Ecolabel for tourist accommodation services has a mandatory requirement on waste separation into fractions for each the local or national authorities provide the appropriate stream collection systems. Given the

difference in waste collection and disposal services throughout Europe it is proposed that the same approach is taken here. Moreover, waste sorting and discarding is also covered as part of the mandatory Criterion M5 on Staff Training.

Article 11 (1) of the Waste Framework Directive¹ requires Member States (MS) to separately collect at least paper, metal, plastic and glass by 2015. A report published by DG Environment in 2013 analysing the waste management performance of all MSs found that there was insufficient separate collection and limited available infrastructure.² Therefore, it is not likely that all Member States will meet this target by the end of 2015 and therefore the availability of these solid waste collection infrastructures could prevent some of the service providers from properly disposing of solid waste, even if the sorting is performed correctly.

Proposed changes

- This criterion is proposed to be split into two parts: one addresses relevant solid waste management at the company's premises and one addresses waste management at the cleaning sites.
- Due to differences of implementation in different member states, adequate waste management is proposed to be that dictated by local or national requirements on this matter.

¹ DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 November 2008 on waste and repealing certain Directives

² BiPro (2013), Support to Member States in Improving Waste Management based on Assessment of Member States' performance

3.2 Optional criteria

3.2.1 Criterion 01: Use of concentrated undiluted cleaning products

Criterion 01: Use of concentrated undiluted cleaning products

Only products directly related to indoor cleaning service operations are covered by this criterion.

At least 30% by volume at purchase of all cleaning products used per year shall have a minimum dilution rate of 1:80.

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, the dilution rate shall be provided (through 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 is to be marked as 1.

Introduction

This criterion aims to promote the use of concentrated undiluted products that require a high level of dilution with water before use. Evidence shows that the use of undiluted products results in reduced emissions due to lower packaging material requirements, fuel use for transportation and the lower amounts of resources that are needed to manufacture these products, resulting in lower impacts (AISE, 2013). These impacts are all-the-more lowered when high levels of concentration are achieved.

Initial stakeholder consultations revealed a trend toward the use of these products because of their lower costs, although the economies of scale are only likely to be relevant for large cleaning sites. In 2010, it was estimated that 33% of hard surface cleaning products purchased and used in the EU (plus Norway and Switzerland) were diluted before use (AISE, 2013) but no data was available as to their exact dilution rates.

Relevant stakeholder comments and further research after 1st AHWG meeting

Scope and definition

Confusion can arise between the terms ‘concentrated’ and ‘undiluted’ as formal definitions are not available. In this report, the same approach is taken as for the EU Ecolabel for Hard Surface Cleaners both to clarify the scope of this criterion and to ensure all EU Ecolabel criteria are consistent with one another. The proposed definitions are:

- ‘Undiluted’ refers to products that must be diluted before their intended use. Dilution instructions must be provided.
- ‘Concentrated’ refers to products where manufacturers claim these are ‘concentrated’ meaning that less product is required for the same function. This is common for laundry detergents but can also be used in conjunction with ‘undiluted’ meaning a product for which the dilution rate is significantly higher than usual.

This criterion refers to concentrated undiluted cleaning products and there are multiple methods of setting a minimum concentration or dilution rate. The previous proposal for this

criterion required the use of products that have a minimum active content percentage of 30%. However, some issues were identified with this definition.

The percentage of active contents is not easily available as this is not required to be present on the product SDS or label, and manufacturers may not be willing to provide exact information on the issue due to trade secrets. One way of overcoming this issue is to take the percentage shown in Section 3 of SDSs as the active content, as is done for the Nordic Swan. However, the only substances that manufacturers are required to disclose in this section are those that are hazardous and might not account for all the active content in a product. Furthermore, consultation with one of the market leaders that hold a Nordic Swan license for cleaning services revealed that they were not able to meet the Nordic Swan requirement for 30% or more of products with more than 30% of active content. Discussion with cleaning product manufacturers also highlighted that 30% of active content is very ambitious and, to their knowledge, no products used in routine professional office cleaning activities achieve such a percentage.

For these reasons, it is suggested that a minimum dilution rate is set to define the products in scope, rather than the percentage of active content. This is in line with the approach taken in AISE's Charter for Sustainable Cleaning (AISE, 2013) which requires minimum dilution rates as shown in Table 12.

Table 12: Minimum dilution rates required by AISEs Charter for Sustainable Cleaning

Product	Use	Minimum dilution Rate
Dilutable all purpose and floor cleaners	All	Approx.1: 80 (12ml per litre of water)
Professional building care products	Buckets, machines such as scrubber dryers, special equipment such as foam equipment	1:100
Professional building care products	Refillable spray bottles	1:50

The thresholds cited by AISE are based on industry experts' opinions and a survey of the undiluted all-purpose cleaners present on the European market, which found that 50% of these met the dilution threshold at the time (AISE, 2013). Product listings from companies that manufacture professional cleaning products also showed that, while still limited, a number of products met the 1:80 dilution ratio. Thus, it is proposed that the threshold for this criterion is aligned on the AISE threshold for the Charter for Sustainable Cleaning of 1:80. For the verification and assessment, it is proposed that if several dilution rates are indicated, the one that is most often used by the company is used, as justified by internal staff instructions.

Availability of concentrated Ecolabel products

A number of stakeholders expressed concern over the possibility of meeting both criterion M1(a) and this criterion given undiluted products have a lower volume at purchase and therefore would have a lower weighting when calculating the percentage by volume at purchase. In addition, stakeholders were uncertain about the availability of ecolabelled

concentrated undiluted products and the way this criterion would be assessed (calculation method).

No public data could be found on the availability of ecolabelled undiluted products and their dilution rates, but consultation with cleaning companies confirmed that these are available and that they are making use of such products. Given the lack of data, it is proposed that the percentage requirement for concentrated undiluted (dilution rate above 1:80) product use is lower than the percentage of possible non-ecolabelled products. This way, companies have full flexibility in choosing the types of products they can use and still comply with criteria M1(a) and O1. Moreover, this criterion is proposed to be part of a point system, meaning that if a company cannot meet the required threshold, it can still apply if enough other criteria are met.

CLP labelling

A stakeholder raised the issue of concentrated products being more likely to require CLP labelling and therefore special storage and safety precautions. In order to ensure that all products used within EU Ecolabel cleaning activities do not have an unreasonable impact on the environment and health, Criterion M1(b) is proposed to be added in order to ensure that a minimum level of environmental and safety standards are met for all products used. Consultation of the product catalogues from producers of professional cleaning products and the associated SDS has shown that there are products available that have a dilution rate above 1:80 and do not carry any of the CLP labels indicated in Criterion M1(b).

Verification and assessment

Stakeholders commented that cleaning companies will not be able to provide information on the exact percentage of active substances as this is not directly present on product labels and SDS. Research has confirmed that product labels and SDSs do not contain this information but Section 3 of SDSs are required to provide information on "the chemical identity of the main constituents and any impurity, stabilising additive or individual constituent which is itself classified and contributes to the classification of the substance" (ECHA, 2014). Nevertheless, the present proposal for this criterion requires a minimum dilution threshold rather than a percentage for active content. This information must be provided by the product manufacturer and therefore is easily accessible to cleaning companies and Competent Bodies.

Proposed Changes

- It is proposed that a minimum dilution threshold is set rather than a percentage of active content as this information is more easily available to cleaning companies and CBs.
- It is proposed that the minimum dilution threshold should be set to 1:80 as this figure has been vetted by industry experts and is in line with the AISE Charter for Sustainable Cleaning.

3.2.2 Criterion 02: Use of cleaning accessories with lower environmental impact

Criterion 02: Use of cleaning accessories with lower environmental impact

Only cleaning accessories directly related to indoor cleaning services operations are covered by this criterion.

02 (a) Mops

At least 50% of mops used per year shall have been awarded with the EU Ecolabel for Textiles or with another ISO Type I Ecolabel.

02 (b) Cloths

At least 50% of cloths used per year shall have been awarded with the EU Ecolabel for Textiles or with another ISO Type I Ecolabel.

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 and marking which cleaning supplies have been awarded with the EU Ecolabel for Textiles or with an ISO Type I Ecolabel and the corresponding license numbers.

Introduction

The use of cleaning supplies and accessories has been identified as an environmental hotspot for cleaning services (ADEME, 2010) and the use of ecolabelled cleaning supplies and accessories could provide a reliable way of lowering impacts associated with cleaning services.

The 1st draft of the Technical Report proposed two criteria that dealt with cleaning accessories and supplies with lower environmental impact. The first considered recycled content in these types of products while the other focused on the use of more durable and reusable products. It should be noted that this latter criterion focused on cleaning supplies that are used by the cleaning service provider as part of its cleaning activities and not on consumables - the goods supplied by the company but are intended for use by the client (e.g. hand soap, paper towels). These consumable goods are addressed in Criterion M4: Consumable goods.

Relevant stakeholder comments and further research after 1st AHWG meeting

Scope

Several stakeholder comments were received regarding the scope of the proposed criterion on more durable and reusable cleaning accessories and supplies. The criterion presented in the 1st draft of the Technical Report was intended to cover materials used to carry out cleaning operations, including paper and textile products that are used for the purpose of cleaning but not consumables. However, unclear wording resulted in most of the comments

making reference to products that are consumables and may be provided by cleaning service companies but not used as part of the cleaning activities, such as toilet paper or hand soap.

As a review of life-cycle studies for cleaning services showed that the use of cleaning supplies and accessories is an environmental hotspot, it is proposed to still keep a criterion on cleaning accessories and supplies used on a regular basis in cleaning operations but clarifying the criterion text to remove ambiguity about the scope.

Finally, a number of stakeholder comments were received regarding the previously proposed criterion on recycled content (Criterion 4 as proposed in the 1st Technical Report) and highlighted the existence of various ecolabels for plastic bin bags and suggested these should be used instead of requiring a certain percentage of recycled content.

Threshold

With regard to cloths and mops, all stakeholders agreed that a 70% threshold was too high. These products can be labelled under the EU Ecolabel for textiles and the ECAT catalogues show that there are 1,162 ecolabelled textile products available. However, it is not possible to say how many of these are textiles that can be used in the scope of cleaning services.

Cloths and mops can also be ecolabelled under the "Supplies for microfiber based cleaning" Nordic Swan product group. Table 13 summaries the number of these products available in Nordic countries and, due to the high numbers, the Nordic Swan Ecolabel for Cleaning Services requires, as an optional criterion, for 70% of cloths and mops to be ecolabelled.

Table 13: Number of Nordic Swan licenses for supplies for microfiber based cleaning by country *Source: National Ecolabel websites (2015)*

Country	Number of License
Sweden	133
Norway	12
Denmark	20
Finland	204

In the scope of the EU Ecolabel, a 50% threshold is proposed for ecolabelled textile supplies and accessories in order to render the criterion within reach of countries where the availability is not as high.

Issues related to bin bags

Further research yielded that currently only three national ecolabels can potentially award ecolabels to bin bags (

Table 14) but two of them have very wide scopes and it is impossible to know how many, if any, bin bags are ecolabelled under those schemes. While including a criterion requiring the use of ecolabelled bin bags could drive the market, currently availability is too low to set a threshold and it would be impossible to meet in many countries.

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Table 14: Ecolabels that include bin bags in their scope and number of licenses (Blue Angel, Generalitat de Catalunya (2015)).

ISO Type I Ecolabel	Country	Number of Licenses
Blue Angel – Products from recycled plastic	Germany	27 (unknown how many of these are bin bags)
NF Environnement – Bin bags	France	21
Distintiu de garantia de qualitat ambiental - Raw materials and recycled plastics products	Catalonia (Spain)	2 (not bin bags)

Textile Durability

One comment was received highlighting the importance of encouraging the use of materials which have stronger resistance to washing and therefore last longer. Textile durability is already addressed in the EU Ecolabel and Nordic Swan criteria therefore additional requirements should not necessary.

Proposed changes

The final scope of this criterion is proposed to be reduced to textile cleaning supplies and accessories and the thresholds for both types of products covered lowered to 50%.

3.2.3 Criterion 03: Energy efficiency for vacuum cleaners

The following criterion cites Commission Delegated Regulation (EU) No 665/2013 of 3 May 2013 with regard to energy labelling of vacuum cleaners (both domestic and commercial).. The label format is set in two stages (Label I and Label II). Label I, currently in place and since September 2014, request suppliers to place in the market energy labels from A to G. Label II, in force from September 2017 request suppliers to place in the market energy labels from A+++ to D. Energy labelling of vacuum cleaners is due to be reviewed by 2018.

The criteria for the EU Ecolabel for Cleaning Services will have to be amended in order to reflect any changes to the energy efficiency labels and the energy labelling regulation foreseen to occur in 2018.

Criterion 03: Energy efficiency for vacuum cleaners

Only vacuum cleaners covered by the scope of the Commission Delegated Regulation (EU) No 665/2013 of 3 May 2013 with regard to energy labelling of vacuum cleaners (domestic and commercial cleaning) are covered by this criterion. Exempted from the scope of this Regulation are wet, wet and dry, robots, industrial, central and battery operated vacuum cleaners and floor polishers and outdoor vacuums.

At least one vacuum cleaner used in the provision of the cleaning service operation shall meet class A on energy efficiency as defined in Commission Delegated Regulation (EU) No 665/2013 of 3 May 2013 with regard to energy labelling of vacuum cleaners (domestic and commercial cleaning)

Assessment and verification

The applicant shall provide relevant documentation to show the compliance with the energy class (e.g. invoice of vacuum purchase and product fiche according to Commission Delegated Regulation (EU) No 665/2013 (Annex III)).

Introduction

Vacuum cleaners are the most frequently used pieces of energy-powered equipment used by the cleaning service sector and energy consumption linked to vacuum cleaners has been identified as an environmental hotspot (ADEME, 2010; Consorcio Soligena, 2011). Depending on the cleaning situation, the energy consumption of floor cleaning, of which vacuum cleaners are a major contributor, can account for up to 52% of the total energy consumption for cleaning services (ADEME, 2010).

Relevant stakeholder comments and further research after 1st AHWG meeting

In general, stakeholders were supportive of this criterion but suggested that it should only be applicable to vacuums used during the validity period of the license.

One stakeholder proposed that the criterion should request that newly purchased vacuums fulfil all of set levels of energy class labels required by the Commission Delegated Regulation

(EU) No 665/2013 (currently vacuums are marked with labels from A to G). However, considering the Regulation 665/2013 in force this requirement is already mandatory. Manufacturers are placing in the market energy labels from A to G. This criterion instead proposes that points should be awarded to companies which already have class A energy efficient vacuum cleaners.

Several stakeholders have expressed specific concerns regarding the following technical aspects of the requirement:

Unit of measurement - multiple stakeholders highlighted that the criterion should encourage the use of more efficient vacuum cleaners and energy consumption alone is not an effective measurement unit of the efficiency of this type of machine. . It was referred that dust pick-up performance of vacuum cleaners plays a major role in the overall energy consumption as a vacuum cleaner with poor dust pick-up performance would require additional time to clean the same area compared to one with efficient dust pick-up, leading to higher energy consumption. It is therefore essential for this criterion to take into account dust pick-up efficiency.

The cleaning performance (dust pick up) is a parameter that is taken into account in the Commission Delegated Regulation (EU) No 665/2013 of 3 May 2013 (Annex III). The Regulation in Annex III, identifies the parameters present at the label, showing that the cleaning performance class appears in the energy label format. The label parameters include, besides the cleaning performance classes (dust pick-up for carpet and hard floors), also the dust-re emission class and the sound power level.

Market research was carried out into the classes available for commercial vacuum cleaners. It shows that energy efficient class A is ready available for two of the largest producers of commercial vacuums. Table 15 presents the results obtained.

For the criterion proposal, the energy class was analysed together with the performance levels for distinct vacuum models from two important manufacturers (Table 15). The results show that energy efficient Class A vacuums have in general comparatively better performance levels. Vacuums rated A have the same of better class of performance for carpet and hard floor cleaning, when compared with class B or less than class B energy efficient vacuums (Table 15). Annex D, provides further support on the overall better performance for the class A energy efficiency vacuums by presenting the label characteristics for commercial vacuums rated C, or lower, for energy efficiency.

Table 15: Characteristics of the energy label for several models of commercial vacuum cleaners, rated with A and B for energy class (Kärcher, 2015) and (Nilsfisk, 2015)

Type of vacuums:	Kärcher					Upright brush type vacuums	Nilsfisk							
	Dry vacuums						Dry dust						Portable	
Model	T7/1 eco! efficiency	T10/1 eco! efficiency	T 12/1 eco! efficiency	T15/1 eco! efficiency	T 17/1 eco! efficiency	ID CV 48/2	VP 300 HEPA b)	VP 600 BASIC	VP 600 STD2	VP 600 STD3	GD 930 Q c)	GD 930 Q d)	UZ 964	GDS 5Fly
Rated input power (W)	750	750	750	750	750	1050	900	800	350/800	350/800	800	800	700	800
Energy efficiency (class)	B	B	A	A	A	B	B	A	A	A	A	B	A	B
Carpet cleaning performance (class)	F	F	D	D	D	D	n.a.	D	B	B	n.a.	E	n.a.	E
Hard floor cleaning performance (class)	C	C	D	C	D	*	D	n.a.	E	E	D	D	D	F
Dust re-emission (class)	E	E	E	D	E	E	F	A	A	A	G	G	G	E
Annual energy consumption kWh/year a)	28.1	28.1	24.4	23.9	24.4	31.5	29	23	15	15	23	32	22	29
Sound power level dB(A)	67	67	72	70	71	80	67	71	66/71	66/71	66	66	75	78

a) Indicative annual energy consumption (kWh per year), based on 50 cleaning processes. The actual annual energy consumption depends on how the machine is used.

b) item no. 41600800 ; c) item 107412664; d) item 107410420

Household and commercial vacuum cleaners – Stakeholders have pointed out that there are significant regulatory and performance differences between household and commercial vacuum cleaners. Household and commercial vacuum cleaners are regulated by the energy labelling regulation (Commission Regulation (EU) No 665/2013) and eco-design regulation (Commission Regulation (EU) No 666/2013). There is no differentiation between household and commercial vacuum cleaners in both Regulations (EC, 20014) Although both types of vacuums are used by cleaning companies, they have very different performance requirements. Household vacuums are used to clean smaller areas and are used less frequently. Commercial vacuums are being used daily covering a much larger area (over 1,000m² per day). The eco-design and energy labelling regulations already set ambitious energy caps for household vacuums: the current cap is 1,600W and it will be further lowered to 900W in 2017. Stakeholders have suggested that the requirements imposed by the eco-design regulations are sufficient to ensure that the compliant machines are efficient.

Further evidence collected confirms that the regulations include requirements on various performance aspects of vacuum cleaners, including dust pick-up carpet/hard floor, dust re-emission, energy consumption, two energy caps, sound power level (noise) and durability/material efficiency. Therefore, the current energy label format considers requirements, namely on, carpet and hard floor cleaning performance.

Proposed update

- Amendment was done to the criterion text in the first proposal. In the current proposal it was made clearer the requirement on the energy efficient class A. It was also better specified that after 2017 this criterion needs to be revised to reflect any changes to the energy efficiency labels and the energy labelling regulation foreseen to occur in 2018. Also, the text was amended to cover the existing vacuum cleaners and not the newly purchased ones. This was done to adapt the criterion to a point system requirement aiming to award points to applicants that prove to own vacuums marked as class A for energy efficiency.
- The energy labelling (Commission Regulation (EU) 665/2013) and eco-design requirements (666/20113) regulations came into force on 1 September 2014. This applies to domestic and commercial vacuum cleaners placed on the market. To promote the use of highly efficient vacuum cleaners, it is proposed to awards points to applicants showing to use within the service provision showing to use within the service provision Class A vacuum cleaners on energy efficiency. According to the Commission Regulation (EU) 665/2013, class A vacuums are currently the best performers for energy efficiency. Further research showed that class A energy efficient vacuums are available in the market (Karcher, 2015; Nilfisk, 2015). This criterion, however, is proposed to be an optional requirement. This is due to the fact of the recent legal binding requirement on the energy class labelling of vacuums cleaners and also on the cost implication of upgrading vacuums in use (as example the life time of a vacuum can be about 8 years).
- The assessment and verification mechanism for on-going compliance of the criterion is a concern for some stakeholders. It is however, recommended to request the purchase invoices of vacuum cleaners and the product fiche indicating the energy class according to Annex III from the Commission Delegated Regulation (EU) No 665/2013 as a mean of proof for this criterion.

3.2.4 Criterion 04: EMAS registration, ISO 14001 certification of the service provider (new criterion)

Criterion 04: EMAS registration or ISO 14001 certification of service provider

04 (a) EMAS

The applicant shall be registered under the Community eco-management and audit scheme (EMAS).

OR

04 (b) ISO 14001

The applicant shall be certified according to the ISO 14001 standard.

OR

04 (c) EMAS and certification according to ISO 14001

The applicant shall be registered under the Community eco-management and audit scheme (EMAS) and also certified according to the ISO 14001 standard

Assessment and verification

The applicant shall provide the EMAS registration or ISO 14001 certificate as a proof of compliance with, respectively, Criterion 04(a) and 04(b). Both the EMAS registration and ISO 14001 certificate shall be provided to show compliance with criterion 04(c).

Introduction

The implementation of an Environmental Management Systems (EMS) is a common requirement for good environmental management, as it improves resource efficiency and reduces the environmental impacts associated to a service.

Relevant stakeholder comments and further research after 1st AHWG meeting

The stakeholder feedback on the original proposed criterion is captured in the text for Criterion M7 above (Section 3.1.7). The decision of splitting the original criterion (Criterion 14 in the 1st Technical Report) and making the requirement of a certified/registered EMS an individual optional criterion was made to address the concerns that the limited resources of small companies could be an unreasonable obstacle due to the high costs of obtaining a certification (or registration) of an environmental management system.

A UK DEFRA study (Defra, 2012) found that certified EMSs delivered cost savings for the majority of the study sample, with an annual average saving over 2 years of €4,875 per €m turnover. The costs of certifying and implementing the EMS were calculated at €1,362 per €m turnover (annual average over 2 years), therefore suggesting a payback period of 3 months. However the report also pointed out that there was considerable variation in the

savings observed and that not all SMEs in the study achieved savings and those SMEs that invested more in implementing the EMS upfront achieved the highest savings (Defra, 2012).

Thus, this criterion is proposed to be optional as most cleaning companies are not EMAS registered or ISO14001 certified and companies might choose that it is not in their business' best interest to invest in such a certification. Throughout Europe 80 cleaning companies (classified with the NACE codes 81.21, 81.22 and 81.29) present in eight countries have EMAS registrations, with Austria, Italy and Spain being in the lead with over 20 companies each (EC helpdesk, 2015). Not data specific to cleaning companies was available for ISO14001 certificates, although it is known that ISO14001 certificates have been issued (DG ENV, 2015) for all activity sectors.

Proposed update

This criterion is an extension of Criterion M7: Environmental management measures and practices and is proposed to be part of the point system in order award companies that do invest in a certified/registered EMS but not render the EU Ecolabel out of reach for smaller companies that do not invest in such certifications.

3.2.5 Criterion 05: Solid waste sorting and disposal at the cleaning sites

Criterion 05: Solid waste sorting and disposal at the cleaning sites

Only waste generated at the cleaning sites, whenever the client provides the means for cleaning staff to sort waste into relevant solid waste streams, is covered by this criterion.

Solid waste generated at the cleaning sites shall be sorted into relevant waste stream categories wherever the client provides the means (e.g. waste containers for distinct solid streams) for the sorting of different solid waste. When waste disposal is the responsibility of the applicant, this shall be done in accordance with local or national waste management practices and facilities.

Assessment and verification

The applicant shall provide a declaration of compliance supported by documents indicating the different categories of solid waste collected and sorted at the cleaning sites. An indication of the different solid waste streams that can be accepted for further treatment or disposal by the local authorities, and/or by private agencies (under relevant contracts) shall also be provided.

Introduction

Handling of solid waste is a significant part of cleaning service practices. The research performed by ADEME (2010) suggests that solid waste can account for up to 91% of the freshwater ecotoxicity impact of cleaning services. This criterion aims to ensure that cleaning companies separate and dispose of relevant solid waste streams as required by the local or national waste management facilities.

Relevant stakeholder comments and further research after 1st AHWG meeting

Stakeholder comments required clarification of whether this criterion applies to the clients' or the company's premises. Stakeholders also expressed concern that, with the proposed criterion wording, the solid waste sorting facilities are not always present at the cleaning sites and thus the solid waste sorting and consequent disposal is out of the control of the cleaning service provider and its staff.

For the purpose of clarity, it is proposed to split this criterion into two parts. This part of the criterion focuses on the relevant solid waste sorting and disposal at the clients' premises.

Other schemes also consider the issue of waste generated at the cleaning sites. Green Seal also requires waste stream separation for waste generated as part of cleaning operations, implying this should also occur at clients' premises.

Article 11 (1) of the Waste Framework Directive³ requires Member States (MS) to separately collect at least paper, metal, plastic and glass by 2015. A report published by DG Environment in 2013 analysing the waste management performance of all MSs found that there was insufficient separate collection and limited available infrastructure.⁴ Therefore, it is not likely that all Member States will meet this target by the end of 2015 and therefore the availability of these solid waste collection infrastructures could prevent some of the service providers from properly disposing of solid waste, even if the sorting is performed correctly.

The proposed criterion on waste management in the EU Ecolabel for tourist accommodation services requires companies to meet the local or national solid waste requirements. Given the difference in waste collection and disposal services throughout Europe it is proposed that the same approach is taken here to award best practices.

As previously mentioned, the cleaning company has no control over the waste management sorting schemes available at the clients' premises. In addition, these will vary depending on a client's own arrangements and also on the waste management facilities made available locally. Thus this criterion cannot set out a requirement for how waste sorting should be carried out. However, it can be required that all cleaning staff to separate relevant waste streams from cleaning operations according to the facilities available in the client premises. Moreover, waste sorting and discarding is covered as part of the mandatory Criterion M5 on Staff Training.

Proposed changes

- It is proposed to split the first proposal of this criterion into two parts. This one addresses waste management at the cleaning sites.
- Due to differences of implementation in different member states, adequate waste management is proposed to be that dictated by local or national requirements on this matter.
- Given the lack of control over waste collection facilities present at the cleaning sites, it is proposed that cleaning staff must sort and dispose of relevant waste from cleaning operations according to the system provided by the clients.

³ DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 November 2008 on waste and repealing certain Directives

⁴ BiPro (2013), Support to Member States in Improving Waste Management based on Assessment of Member States' performance

3.2.6 Criterion 06: Quality management (new criterion)

Criterion 06: Quality management (new criterion)

The applicant shall have appointed a service manager and put in place a management plan for a quality management system that includes procedures for monitoring, assessing and improving cleaning quality, as further described below. Additionally, written instructions for cleaning staff shall be made available. The manager can be the facility manager, a foreman/woman, or a co-ordinator nominated to organise and supervise the cleaning.

The applicant shall have implemented a quality management system that shall at minimum include the following components;

- An agreement between the service provider and the client describing the way the quality of the work is to be assessed
- Procedures for monitoring, assessing and improving the cleaning tasks carried out by the service provider (detailed below)
- Internal audits
- Follow up improvement actions for cleaning quality
- Survey of client satisfaction

The service provider shall draft written work instructions, signed off on by the applicant's management team, that cover the work tasks encompassed by the service. This requirement shall at minimum consist of the following components:

- Description of the task (e.g. office, sanitary, windows cleaning)
- Quality (e.g. 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)

The company shall maintain records demonstrating the compliance with this requirement.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion supported by:

- A document identifying the manager responsible for the compliance with this criterion (an organogram may be used to describe the organisational structure of the service provider and identify the manager).
- Copies of documents showing the company's quality management plans (e.g. quality policy, procedures and quality check forms).
- The company documents showing the procedures linked to cleaning quality. Note: In case these procedures are compliant with the requirements from 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 shall provide the certificate of compliance.

Applicants certified according to ISO 9001 are considered as having fulfilled this criterion if they provide the ISO 9001 certificate to the Competent Body as proof of compliance with this

critterion.

Introduction

The implementation of a quality management system is good practice in cleaning services because of the subjective and intangible nature of how quality, in other words cleanliness, is perceived and assessed. Implementing a quality management system can help cleaning service providers establish robust quality benchmarks and work with clients and their staff in a systematic and effective manner, which is essential for EU Ecolabel service.

Relevant stakeholder comments and further research after 1st AHWG meeting

During the 1st AHWG meeting and in the written comments stakeholders stated that a criterion on cleaning quality management and monitoring is needed. Further stakeholder interviews (service providers) have identified the current industry practices as follows:

Responsibility and management processes

- Dedicated positions, such as regional managers and quality assurance managers, are set up to manage and perform quality checks. These personnel often perform quality checks with clients.
- Regular quality management processes and activities were in place for all cleaning companies that were interviewed. Quality management processes and activities are also affected by the terms and requirements of client contracts.
- The implementation format of quality management measures greatly varies among cleaning service providers.
- Frequency of quality checks varies between companies and contracts. They range from weekly to yearly and the frequency is primarily determined by client size and requirements. Different record keeping tools are used for quality assessments, such as tablets, PDAs and paper forms.
- Cleaning service providers suggested that it is useful to make quality checks more frequently but it is not done due to cost and/or lack of interest from the client side.

Cleaning quality monitoring

- The biggest challenge for the quality control of cleaning is making an objective assessment on cleanliness as there is no single objective standard and requirements are mostly defined by clients.
- Published cleaning quality standards are used by some cleaning service providers to demonstrate that their services are delivered with a certain level of quality. Cleaning service providers also mentioned that competitive advantage is one of the key drivers for external accreditation. Some of the interviewed companies claimed to use the following standards: EN 13549:2001 - *Cleaning services. Basic requirements and recommendations for quality measuring systems* or INSTA800 - *Cleaning quality - System for the establishment and assessment of cleaning quality*.

Further research was performed to assess the suitability of using quality management standards principles for this criterion. [ISO 9001 \(Quality management systems – Development of EU Ecolabel Criteria for Indoor Cleaning Services\)](#)

Requirements) is the most recognised international quality management system standard and it has more comprehensive requirements on the development, documentation, implementation and maintenance of a quality management system than the other two standards investigated. ISO 9001 is a generic standard that can be applied to any product or service.

In addition to the quality management system some companies address cleaning quality issues by using others standards such as EN 13549:2001 (Cleaning services. Basic requirements and recommendations for quality measuring systems) and INSTA 800:2010 (INSTA 800 Cleaning quality - System for the establishment and assessment of cleaning quality). These were designed specifically for the cleaning service industry and focus more on cleaning quality matters than on management systems implementation. The EN 13549:2001 standard provides basic requirements and recommendations for quality measurement systems for cleaning performance. The INSTA 800:2010 is based on the general principles stipulated in EN 13549:2001 and describes two main principles: visual inspection and inspection using measuring instruments.

Other ecolabels for cleaning services have also been reviewed to assess how they tackle the issue of quality. The Nordic Swan scheme has an obligatory criterion on quality requiring the applicant to put in place a system for monitoring cleaning quality that includes details of the way in which the quality of the work is assessed and how the result is monitored, procedures for management and control and procedures for drafting inspection reports. In addition, detailed written instructions are required to be provided. For verification and assessment purposes, certificates must be provided of compliance with cleaning quality requirements in accordance with INSTA 800 proven.

The New Zealand Ecolabel has an obligatory requirement for the provider to have in place a system for monitoring the quality of the service delivered and for taking corrective actions. Verification and assessment consists of a written statement on compliance accompanied by supporting documentation including the identification of cleaning quality standards, measures for monitoring and records for clients' feedback, complaints and corrective actions taken.

For this criterion, it is proposed that the assessment and verification is done by the provision of relevant documents (e.g. existing quality management systems, quality policy, procedures and quality check forms) demonstrating compliance with the requirements of this criterion or an ISO 9001 certification.

For applicants who do not have an ISO 9001 certificate, cleaning quality issues are specifically addressed by requiring them to show the Competent Bodies the procedures used for monitoring, assessing and improving cleaning quality as a complementary step to the implementation of the quality management system.

Proposed changes

No proposed changes. This is a new proposal for a criterion on quality management.

Optional criteria (additional aspects)

3.2.7 Criterion 07: Vehicle fleet owned or leased by the applicant

Criterion 07: Vehicle fleet owned or leased by the applicant

Only the vehicle fleet owned and/or leased by the applicant and used in the provision of the cleaning service operations is covered by this criterion. The vehicles can include 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-criteria 07(a) and 07(b) also cover hybrid vehicles but not electrically powered vehicles.

Privately owned vehicles that are used in the provision of the service are not covered by this criterion.

07 (a) Vehicles meeting European emission standard Euro 5

At least one vehicle owned or leased by the applicant and used in the provision of the cleaning service operations shall meet the European emission standard Euro 5 for light passenger and commercial vehicles **(0.1 points per vehicle, maximum 1 point)**

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 leased by the applicant and that they meet standard Euro 5. The vehicles' public registration can be used as proof of compliance.

07 (b) Vehicles meeting European emission standard Euro 6

At least one vehicle owned or leased by the applicant and used in the provision of the cleaning service operations shall meet the European emission standard Euro 6 for light passenger and commercial vehicles **(0.2 points per vehicle, maximum 1 point)**.

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 leased by the applicant and that they meet standard Euro 6. The vehicles' public registration can be used as proof of compliance.

07 (c) Company transport plan

The provider shall have a company transport plan to minimise fuel consumption and maintenance records for the vehicle fleet. **(1 point)**

Assessment and verification

The applicant shall provide a copy of the company transport plan, including fuel consumption evolution. The applicant shall provide a copy of the maintenance plan for the vehicle fleet (vehicle service records can be used as proof of compliance).

Introduction

Evidence from stakeholders and other ecolabelling schemes, including Good Environmental Choice Australian, Good Environmental Choice New Zealand and Nordic Swan, reveal that the transport of cleaning staff and equipment between cleaning sites is prevalent in the provision of cleaning services and there is a margin for improvement in terms of environmental impacts. This optional requirement focuses on aspects that are in line with policy instruments available for improvement of the impact of transports in the EU.

Relevant stakeholder comments and further research after 1st AHWG meeting

Several stakeholders raised concerns regarding the type of vehicles covered (e.g. passenger cars, vans) and also the applicability of this criterion to all the vehicles used for the provision of cleaning services. This criterion covers the vehicle fleet, including the most common vehicles such as light passenger and commercial vehicles (max 3,500 kg), owned or leased by the applicant and used in the provision of the EU Ecolabel cleaning service. However, the criterion does not apply to private vehicles owned by any member of the cleaning team, even if it is used in the provision of the service, as this is out of the influence sphere of the applicant.

Further research was carried out to respond to a stakeholder comment on the carbon emissions levels set in the first proposed criterion (criterion 12B in the 1st technical report). The EU first introduced binding targets for CO₂ emissions for new passenger cars in 2009 (Regulation (EC) No 443/2009 of the European Parliament and of the Council of 23 April 2009) (ICCT, 2014). A similar CO₂ emission standard for new light-commercial vehicles was introduced in 2011 (ICCT, 2014). On February 15, 2011 the European Parliament adopted legislation regulating CO₂ emissions from light commercial vehicles (LCV) in Europe.

More recently at the end of 2013, the European Parliament and the Council of the European Union reached an agreement regarding two regulatory proposals that will implement mandatory 2020 CO₂ emission targets for new passenger cars and light-commercial vehicles in the European Union. The passenger car standards are 95 g/km of CO₂, phasing in for 95% of vehicles in 2020 with 100% compliance in 2021. The light-commercial vehicle standards are 147 g/km of CO₂ for 2020 (ICCT, 2014). Due to the mandatory implementation, a separate sub-criterion on carbon emission is not required and therefore the sub-criterion that settled, in the first criterion proposal, requirements on carbon emissions has been removed.

Stakeholders also highlighted that transport arrangements vary between companies and most cleaning staff use public or private transport to the client premises. Thus, in this second proposal the criterion on vehicles is part of the point system and it will up to the applicant to assess whether complying with it is beneficiary.

In the original proposal of the criterion, "alternative low carbon intensity fuels" referred to fuels that have a lower carbon intensity than the conventional fossil fuel, such as petrol and diesel. Low carbon intensity fuels are mainly biofuels, such as bioethanol and biodiesel. However, stakeholders expressed that the use of alternative low carbon intensity fuels would be hard to verify and their availability might greatly vary on the location. The sub-criterion on this aspect is therefore to be removed.

Hybrid vehicles are covered by this sub-criterion as they are covered by the European emission standards. Although the regulation on vehicle emissions (Regulation 715/2007) is applicable to vehicles for light passenger and commercial vehicles not exceeding 2601 kg,

electrically powered vehicles are excluded from this criterion as the associated emissions are not from the engine of the vehicle but rather from the electricity generation site. The number of vehicles excluded is nevertheless small as data suggests that the market for alternative vehicles is still very limited. In 2012, hybrids, electrics, natural gas and ethanol-fuelled vehicles together only represent 3% of the vehicle market (ICCT, 2013).

In order to make the criterion relevant and applicable, it has been rewritten. Further research has shown that one way of assessing vehicle emissions is through their compliance with European emission standards, Euro 5 and Euro 6. The Euro 5 standard applies as of 1 September 2009 for the approval of vehicles and as of 1 January 2011 for the registration and sale of new types of cars and vans sold in the EU market. As for Euro 6, it is binding for the approval of vehicles as of 1 September 2014 and for the registration and sale of new types of cars and vans as of 1 September 2015. Thus, new vehicles on the market have reduced emissions and it is proposed to reward companies that make use of such new vehicles.

This proposed approach is partially in line with the approach of Nordic Swan, which requests that at least 95% of the vehicles meet the Euro 4 (indicated as "Euronorm IV" in the criteria text) standard. Alternatively 95% of the kilometres driven should be done on a Euro 4 vehicle. Other requirements linked to fuel consumptions are also indicated (the total consumption of petrol and diesel for transport purposes must not exceed 9.0 l/100 km or 0.75 ml/m² (or 1.00 ml/m² if 80% of a service provider's customers have a cleaning area of less than 200 m²)).

A new sub-criterion on transport plan and maintenance records has also been developed, following stakeholder comments, as it is important to cover both the technical side (i.e. what vehicles to use) and the strategic and management side (i.e. the transport plan) of transport. A good transport plan can encourage better transport behaviours (e.g. cycling instead of driving for commuting; more efficient transport of cleaning equipment) and lead to direct environmental impact reductions (ETA, 2015). Other ecolabels for cleaning services, including Nordic Swan and Good Environmental Choice Australian, also have specific criteria on this area.

Proposed update

- Sub-criterion 07(a) and 07(b) are proposed to be updated to cover all owned or leased vehicles and are related to different levels of compliance with the European emission standards (i.e. Euro 5 and 6).
- The original sub-criterion 07(c) on alternative low carbon fuels is proposed to be removed.
- A new sub-criterion 07(c) on a transport plan and maintenance records is proposed in order to cover all aspects related to transports.

3.2.8 Criterion 08: Efficiency of laundry washing machines owned by the applicant

The following criterion cites *Commission Delegated Regulation (EU) No 1061/2010 of 28 September 2010 with regard to energy labelling of household washing machines*. Energy labelling of household washing machines is currently under revision and, at the time of writing, is expected to be completed in late 2016 or early 2017. Once the new regulation goes into force, the criteria for the EU Ecolabel for Cleaning Services will have to be amended in order to reflect any changes to the energy labelling regulation (for example, it is expected that very few, if any, machines will comply with the top energy class).

Criterion 08: Efficiency of laundry washing machines owned by the applicant

Only household washing machines owned by the applicant to launder cloths, mops and staff uniforms used as part of the cleaning service provision and covered by the Commission Delegated Regulation (EU) No 1061/2010 of 28 September 2010 with regard to energy labelling of household washing machines are covered by this criterion.

08 (a): A+++ washing machines (maximum 2 points)

At least 50% of the existing in-house household washing machines shall comply with at least EU Energy Label class 'A+++' for energy efficiency under the energy labelling regulation for household washing machines ((EU) No 1061/2010).

08 (b): A++ washing machines (maximum 2 points)

At least 90% of the existing in-house household washing machines shall comply with at least EU Energy Label class 'A++' for energy efficiency under the energy labelling regulation for household washing machines ((EU) No 1061/2010).

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 cleaning service provision) and documentation indicating the energy efficiency class for the existing household laundry washing machines.

Product fiches according to Commission Delegated Regulation (EU) No 1061/2010 (Annex II) can be used as proof of compliance with this requirement.

Introduction

The water and energy used for washing textile cleaning accessories (e.g. mops, cloths) are an environmental hotspot for cleaning services as the washing/drying of reusable mop heads accounts for up to 66% of the total water consumption (ADEME, 2010). This criterion therefore focuses on encouraging applicants to improve the energy efficiency of their household washing machines.

Relevant stakeholder comments and further research after 1st AHWG meeting

Stakeholders asked for the scope of this criterion and the products washed to be clarified. The proposed criterion title and text have been amended to clarify that all types of laundry activities associated with the provision of cleaning services are covered, including the washing of textile cleaning accessories (e.g. cloths, mop heads) and staff uniforms. Moreover, it is proposed that this requirement shall apply whenever the products are washed using household washing machines owned by the cleaning service provider.

The criterion proposed for the 1st AHWG meeting only covered domestic washing machines as initial research showed this type of machines is primarily used by cleaning staff to launder accessories and uniforms. Stakeholder feedback following the 1st AHWG meeting and stakeholder interviews suggested that professional and semi-professional washing machines are also installed on larger sites. Further investigation was undertaken to identify regulations or standards for the verification of efficient professional washing machines. Currently Eco-design Requirements of Energy-using Products for non-household washing machines are under development (ECEEE, 2015), as well as a standard for measuring their energy efficiency (REF: personal communication with Oko-institute). The potential for energy labelling for professional machines was studied (ECEEE, 2015b) but the development of the corresponding classes had not yet begun at the time of writing. Thus professional washing machines are proposed not to be covered by this criterion but their efficient use is proposed as part of the criterion on Staff Training.

Energy efficient household washing machines are increasingly present on the market with A+++ energy class machines, already accounting for 8% of new appliances sold in 2011, 22% at the start of 2013 and it is estimated that 43% of the EU 2014 sales are A+++ (Topten, 2015). The optional sub-criterion O8(a) requests the purchase of washing machines belonging to the best class in terms of energy efficiency. Due to the prevalence of class A++ and A+++ washing machines, sub-criterion O8(b) requests that 90% of the domestic washing machines fulfil at least class A++. The sales of class A++ or above washing machines (64% in 2014, presenting over 9.7 million machines sold on the EU market (Topten, 2015)) justify the amendment made to the proposal made in the 1st Technical Report (Class A).

Criterion O8(b) also aligns with the optional requirement in the EU Ecolabel for Tourism Accommodation Services on the domestic washing machines.

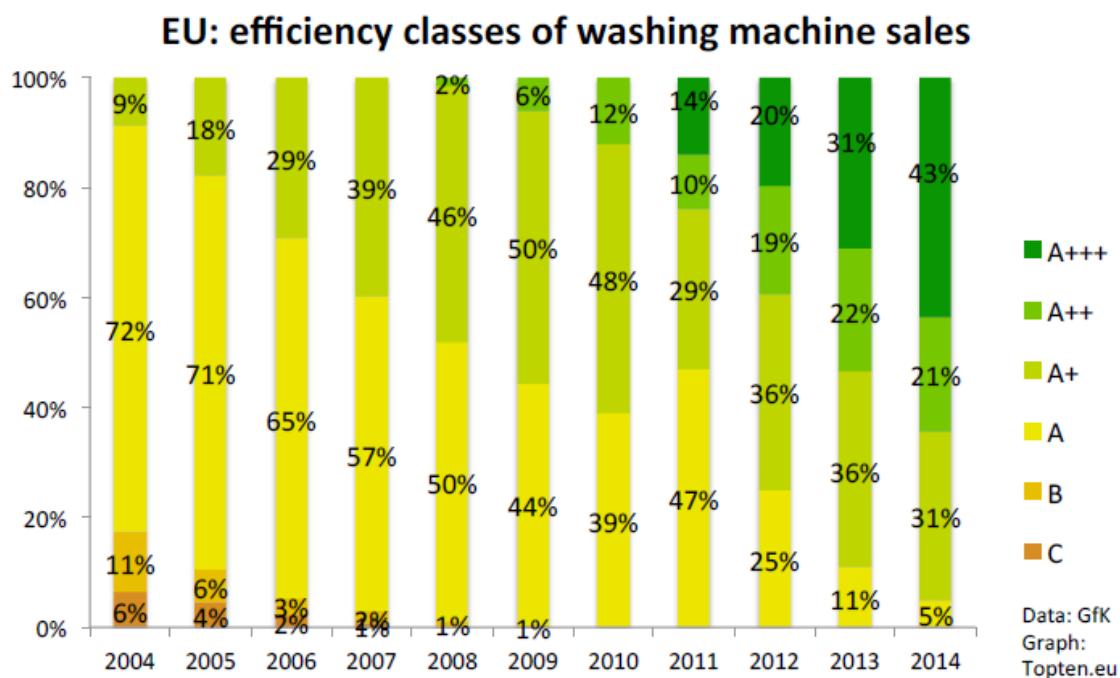


Figure 2: EU: efficiency classes of washing machine sales (Topten, 2015)

Proposed update

- The scope of this criterion is proposed to be updated in order to clarify that only household washing machines used to wash cleaning accessories (e.g. cloths, mop heads) and staff uniforms are covered.
- The requirement on the use of ecolabelled laundry services (proposed in criterion 8A in the 1st Technical Report) is now proposed to be moved to Criterion 09, which covers outsourced auxiliary services and products.
- Professional washing machines are not proposed to be covered by this criterion due to the absence of an energy labelling regulation or other appropriate verification instruments, nevertheless it is proposed that the efficient use of professional washing machines should be covered as part of Staff Training (Criterion M5).
- The criterion 08(b) was reworked in order to fit into the point system. The first proposal required that newly purchased washing machines were class A+++ . This new proposal sets a threshold of 50% for the existing in-house washing machines to be class A+++ . The threshold was set by supporting evidence on the last figures for sales of house hold washing machines (43%) in EU in 2014 were class A3+.
- The energy class in Criterion 08(b) (corresponding to Criterion 8C in the 1st Technical Report) is proposed to be more ambitious in order to reflect the successful market uptake of best performers in energy efficient washing machines. The new proposal for the energy class is A++ (by opposition to the request of class A in the first proposal). Also due to the successful market uptake of the best performers in energy efficacy, the proposed threshold is now set at 90% (class A++) for in-house washing machines (opposed to the requirement for 50% for Class A in the first proposal).

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- In terms of assessment and verification, the requirements are proposed to be updated to allow Competent Bodies to verify the applicant's on-going compliance of this criterion by having the applicants provide a list of machines they own along with their product fiches.

DRAFT

3.2.9 Criterion 09: Outsourced auxiliary services and products

Criterion 09: Outsourced Auxiliary services and products

This criterion is only applicable if the applicant makes use of outsourced auxiliary services and products, defined as services and products that are not directly used in the provision of cleaning services but are used to support the everyday business operations of the cleaning service provider. These outsourced auxiliary services and products can include, but are not limited to, laundry services outsourced by the applicant to a third party, laundry detergents and dishwasher detergents.

At least 50% by expense of auxiliary services outsourced by the applicant to a third party and/or auxiliary products purchased per year to support the delivery of the cleaning service operations shall have been awarded with the EU Ecolabel or with another ISO Type I Ecolabel.

(1 point per service, 0.5 points per product – maximum 2 points)

Note: Ecolabelled products as cloths and mops, drying paper and soap fall outside the scope of this criterion as they are covered by Criterion 02: Use of cleaning accessories with lower environmental impact (for cloths and mops) and Criterion M4: Consumable goods (for paper towels, tissue and toilet paper and had soap).

Assessment and verification

The applicant shall provide annual data and documentation (including relevant invoices or site inventories) indicating the auxiliary services and products used and marking which services and products have been awarded with the EU Ecolabel or another ISO Type I Ecolabel and the corresponding license numbers.

Introduction

Some products and services that can be used to support the delivery of indoor cleaning services, such as external laundry services, present significant opportunities for improving the environmental performance of cleaning services as a whole as they also contribute, among others, to energy and water use and waste generation.

It is proposed that a threshold is set for the minimum amount of these auxiliary services and products that should be ecolabelled. As the availability of such products is low in a large number of member states, it is proposed that this criterion should be part of the point system.

Relevant stakeholder comments and further research after 1st AHWG meeting

The following key auxiliary services and products have been identified:

- Laundry services – the washing of cleaning accessories, and occasionally staff uniforms, has been identified as a key environmental impact hotspot for cleaning services in the environmental analysis performed by ADEME (2010). This task is sometimes outsourced to a third party laundry service provider that, if possible, should be ecolabelled in order to minimise the service's environmental impacts. Nevertheless, the majority of stakeholders expressed concerns over the availability of

such ecolabelled services in many member states. Therefore it proposed that this sub-criterion not be part of a mandatory criterion.

- Laundry detergents – stakeholders have requested the inclusion of a laundry detergent requirement in the EU Ecolabel for cleaning services because laundry detergents are regularly used by cleaning service providers for washing cleaning accessories (e.g. clothes and mops). A large array of ecolabelled laundry detergents for domestic machine is available on the European market but only a very small number of such Industrial and Institutional (I&I) products are available. Moreover, a stakeholder raised the point that there are also ‘hygiene’ detergents used in cleaning services in I&I laundry equipment that cannot be awarded the EU Ecolabel due to stringent criteria. It should be nevertheless noted that the scope of the EU Ecolabel for laundry detergents not only covers consumer products but also products which are aimed at small companies and can be used in domestic-like and semi-professional machines.
- Staff uniforms - uniforms are used as livery for some cleaning service companies and are made of textiles for which multiple ecolabelling opportunities exist, such as the EU Ecolabel for textiles.

Further research on other ecolabel schemes yielded that Nordic Swan have a large range of auxiliary services and products which are covered by optional criteria (laundry services (100% of external laundry services must be ecolabelled), car washes (at least 50%), printed matter (100%), photocopying paper (at least 90%), washing machines (at least 50% of the owned washing machines), work clothes (at least one set of the work purchases for personnel), fuel for transport uses (50% of the purchased fuel for transport)). At this stage it is not proposed to list all the possible auxiliary services and products in the EU Ecolabel as in Nordic Swan as their availability is unknown outside of the Nordic countries.

Proposed Changes

In the first draft of the TR, external laundry services and in-house washing machines were covered by one criterion, staff uniforms in another and other auxiliary products were not covered. In this report, these different services and products are combined under one criterion in order to highlight the fact that they may be relevant to the provision of cleaning services by some of the cleaning service companies.

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Annex

Annex A: Stakeholder feedback following 1st AHWG meeting

If feedback left by a stakeholder tackled more than one issues, the comment might be split into two cells in the following table, for clarity's sake.

Comment area	Stakeholder feedback	IPTS response and further research
General	Criterion for Quality is missing. For that purpose, it should be useful to consider the following European Standard: EN 13549:2001 - Cleaning services - Basic requirements and recommendations for quality measuring systems	Comment accepted: A new criterion addressing quality has been developed (Criterion 06: Quality management (new criterion)) based on the suggested European Standard (EN 13549:2001 - Cleaning services - Basic requirements and recommendations for quality measuring systems) as well as other standards related to quality and cleaning services. The approaches taken by Nordic Swan for cleaning services and EU Ecolabel for Tourism Accommodations and Camp Site Services were also assessed. See Section 3.2.9 for more details.
General	Clarify who is going to apply: a licence for a company or a contract	Comments accepted: Applicant specification has been added as a new section (Section 2.2). This section defines the characteristic of potential applicants such as that the application should happen on a service line basis and not to an organisation as a whole. Moreover, it is proposed that the service awarded with the EU Ecolabel cannot
General	It has to very clear how a service in practice will apply for the EU Ecolabel. It is very important that this is clear before defining the scope.	

General	<p>There are only a few cleaning companies that only perform classical cleaning services. On the contrary, almost all companies in the cleaning market perform a lot of other services up to the whole range of Facilities Management. So the title “Cleaning Services” leads to the assumption that the single contract or single cleaning activity of a company should be eco-labelled and not the entire company. If that assumption is correct, the Ecolabel would be only awarded to a (smaller or bigger) part of the companies’ activities. This has to be kept in mind throughout all criteria and especially when setting specific thresholds / percentages! The practicability is however highly questioned, as we see no possibility for a differentiation between all the single activities of a company, for example the use of general purpose cleaners when cleaning inside or outside the focus of the Ecolabel.</p> <p>On the other side, if the Ecolabel is planned to be given for the entire company how will you differ between the activities inside and outside the scope for checking the compliance of criteria / thresholds? An easy example related to criterion 12 (purchase of new vehicles) demonstrates this: the same driver uses a vehicle to visit a customer of an eco-labelled cleaning service and another customer whose services are not under the scope of the Ecolabel.</p>	<p>simultaneously provide EU Ecolabel and non-EU Ecolabel services.</p> <p>See Section 2.2 for more details.</p>
General	<p>On-site visit/audit: there should be a requirement for audits, in particular within the premises of the customer.</p>	<p>Comment accepted: A section explaining the procedures for assessment and verification has been added. It is proposed that the Competent Bodies should make an on-site inspection of the cleaning service provider’s premises as well as at least one on-site inspection at a client’s premises.</p> <p>See Section 2.3 for more details.</p>

General	<p>The overall cleaning market in Europe is characterized by a low price structure. This goes equally for private and public clients. Especially in public procurements, the contracting authorities are early adapters in demanding whatever is available as a label or standard. Once an Ecolabel for cleaning services is available, a lot of public tenders will demand this Ecolabel – without being willing to pay more than before! So if cleaning companies want to participate in public tendering in the future, they will be forced to reach for an Ecolabel. Although they will not reach better prices or even defray their costs. Even worse: in case the Ecolabel will not be given for single contracts but for the entire company, bidders will have to handle all efforts for the whole turnover. Customers who never demanded an Ecolabel will get eco-labelled services without paying or appreciating it. This is a totally different situation when selling products: customers are aware of buying eco-labelled products and in most of the cases are willing to pay more for that.</p> <p>We do strongly deny the argument of the Technical Institute in Seville, according to which the request of such an Ecolabel in tender documents would not be possible. On the contrary, we are convinced that this will be the case with a detrimental effect on cleaning companies.</p>	<p>Comment rejected: The EU Ecolabel is a voluntary scheme and is not an instrument to drive the market to comply with any benchmark, but to identify the best performers and provide that information to consumers. As stated in the EU Ecolabel regulation 66/2010, Annex I, A.2, the EU Ecolabel is awarded to the best 10-20% of the products available on the EU market in terms of environmental performance. Therefore is unrealistic to assume that EU Ecolabeled Services will become pervasive in the market. Ecolabeled products will cover 10% to 20% of the market supply and will be an element of market differentiation as intended.</p> <p>As stated in Section 2.2, it is proposed that the EU Ecolabel is awarded on a service line basis and not to the whole organisation meaning that a company is free to choose to also offer a "conventional" service line to customers not requiring EU Ecolabel services.</p> <p>Concerning the potential requests of EU Ecolabel Cleaning Services in tenders, as indicated in the Buying Green Hand book, procurers cannot explicitly request for a company to offer EU Ecolabel services but can only draw inspiration from EU Ecolabel and EU GPP criteria. Only when the new Public Procurement Directive (214/24/EU) is transposed into national legislation and enters into force will it be possible for procurers to request a label, but even in this case with the restriction that every single criterion used in the award of the said label respects the public procurement principles and is directly related to the subject matter of the procurement contract. Since the EU Ecolabel for Cleaning Services has a broader scope than the subject matter of Cleaning Services procurement contracts, some of its criteria will not be directly related to the subject matter of the procurement contract and, consequently, it will not be possible for procurers to demand Ecolabeled services.</p>
General	<p>General concern: Cleaning companies can vary a lot in size. We would like to share our concern that the criteria should be drafted in such a way that a small company with limited resources available should be able to obtain the EU Ecolabel. For example the burden on the applicant is very different to verify that 2/3 cleaning products used carry the EU Ecolabel compared to 70% by volume. The latter requires a much more complicated calculation than the first.</p>	<p>Comment accepted: As much as possible, the information asked to be provided by the applicant is limited to information that any company should collect in order to run their business in an efficient and safe manner. Regarding calculations, the volume-at-purchase is proposed to be considered in Criterion M1: Use of cleaning products with lower environmental impact, this volume is known to companies when they make purchases and should be present on invoices. A User Manual will also be developed later on with tables that are easy to fill in and that help with calculations.</p>
General	<p>We should consider that some of the cleaning companies are very small. How will they collect the necessary evidence with the lowest administrative burden possible?</p>	

General	Why are other cleaning products not taken into account like hand dishwashing detergent (HDD), dishwasher detergent, laundry detergent? If a cleaning service washes the cups and glasses of the staff in an office, this could be done the EU Ecolabel HDD. When they wash the uniforms of their staff or the mops that have been used for cleaning, this could also be done with EU Ecolabel products. The scope should reflect in a clear way what is covered by the criteria and what isn't. If we can set a criterion on the energy efficiency of washing machines, we can also set a criterion on the type of detergent used for washing.	Comment partially accepted: The main focus of the EU Ecolabel is the cleaning of indoor spaces such as offices, etc. and not dishes or laundry. Nevertheless, it is accepted that auxiliary products and services (e.g. laundry detergents, external laundry services) may be used by cleaning service providers in order to provide a good cleaning service. Thus, a new criterion has been introduced to tackle this issue: Criterion 09: Outsourced auxiliary services and products. Dishwashing performed by the cleaning service provider has not been found to be a common occurrence but hand dishwashing detergents can be considered under the criterion cited above.
General	The criterion would lead to an unbelievable bureaucratic effort, which would not at all be feasible in practice.	Comments accepted: A proposal for a point system is made in this second Technical Report in order to offer more flexibility on certain criteria. See Section 2.4 for a detailed description of the proposal, how the difference was made between mandatory and optional criteria and how the points were assigned.
General	Envisage the flexibility of points system, in addition to mandatory requirements.	
General	The criteria should be drafted in a way they are applicable in many different situations. A point system could be an option perhaps a combination of some mandatory criteria and a point system as in the criteria for tourist accommodation services.	
General	General concern: Not only the size of cleaning companies can vary. A point system could be an option perhaps a combination of some mandatory criteria and a point system as in the criteria for tourist accommodation services.	
General	Generally, we would like to have criteria based both on mandatory (absolute limits) and on optional (points requirements) requirements. All areas do not have the same weight from the environmental perspective and with only absolute requirements the less important areas get too high importance. The criteria must work in whole Europa where the differences may be high in this particular product group between different countries. Therefore a points system could give a flexibility that can even out the differences	
General	Until now, all existing EU Ecolabels concern the labelling of products. The project to develop an EU Ecolabel for cleaning services is treating for the first time a service provision. Contrary remarks by the Technical Institute in Seville, according to which two other EU Ecolabels on services already exist (EU Ecolabel for campsites and tourist accommodations), are not suitable, as these two Ecolabels deal with static buildings/sites where the consumption of water, electricity and the use and consumption of specific products etc. can be easily assessed. The development of an EU Ecolabel for cleaning services is much more difficult, if not impossible to carry out, as it concerns a service that is provided thousands of times in thousands of different premises all over	Comment accepted: The changes proposed in this update Technical Report reflect the fact, mentioned in the comment, that cleaning service providers rely on infrastructures provided by the clients and cannot easily assess such aspects as water or electricity use. It is proposed to tackle the reduction of resource use in Criterion M5: Staff training. Concerning the assessment of product use, efficient business practices call for records of products purchased and assigned to cleaning sites to be kept. Thus, the assessment of product use is proposed to be kept as part of the criteria.

	Europe. In addition, cleaning activities are performed in the customer's premises, so a lot of aspects with effect on the environment are out of the responsibility of the cleaning service provider.	
Executive summary	Should be criteria	Comment accepted.
Terms & definitions	Hospitals are considered as public structures? I think it is better to explicitly mention hospitals in definitions. In Italy the GPP market is driven by Hospitals requests.	Comment accepted: The definition of 'public buildings' has been updated to clarify how hospitals are being considered, "Terms and definitions". Moreover, the scope of the criteria is proposed to explicitly provide the example of publically accessible hospital areas, see Section 2.1.
Terms & definitions	Are there duplicate sentences here or do you want to indicate that external window cleaning is excluded?	Comments accepted: The definition has been updated to remove repetition and offer more clarity, see "Terms and definitions".
Terms & definitions	What about other intervals? e.g. bi-weekly, monthly etc.	Comment accepted: The definition has been updated to refer to "routine cleaning", which is defined as at least monthly in the case of surface cleaning, see "Terms and definitions".
Terms & definitions	This definition is not correct and does not accord with the definitions below for routine and specialised cleaning products.	Comment accepted: The term has been removed from the list in order to avoid repetition and confusion.
Terms & definitions	Why is it only reusable? In Hospitals and some other public institutions, the accessories may deliberately be single-use.	Comment accepted: Single-use non-chemical products used in the cleaning services fall under "cleaning supplies", see "Terms and definitions".
Terms & definitions	This looks more like a generic definition for a Type 1 Ecolabel - if we want to specifically define the term 'EU Ecolabel' please use the definition on the EU Ecolabel website or in Regulation 66/2010.	Comment accepted: The definition has been updated as suggested.
Product Group definition and scope	What is the definition of sanitized? Is disinfection included in? The disinfection products are a huge market for I&I public procurement.	Comments accepted: The product group scope is no longer proposed to include the word "sanitised" in order to avoid confusion as originally it was meant to mean "the cleaning of sanitary installations, e.g. bathrooms". A difference is now made in "Terms and definitions" between "sanitary cleaning" and "sanitation" but also "disinfection". It is also now proposed to explicitly exclude disinfection activities from the EU Ecolabel, see Section 2.1.

Product Group definition and scope	Include "and prevent disease transmission"	Comments rejected: The EU Ecolabel has a vocation to deal with environmental issues and not health and safety issues, thus this phrase has been added to the scope of the product group.
Product Group definition and scope	Please define the word "periodically". For us it refers to carpet cleaning that we learned was not in the scope yet and to thorough cleaning	Comments accepted: The word "periodical" has been replaced with "routine", which is defined in the proposed scope. See Section 2.1 for more details.
Product Group definition and scope	The Nordic Ecolabel criteria cover the domestic cleaning but there is almost license holders offering that kind of service. We think that domestic cleaning operation must not be included in the scope, the operations cannot be verified and under control.	Comment partially accepted: Although market research has shown that professional cleaning services in domestic settings represent a very small portion of the market, no specific differences were found in the provision of services in public/commercial building and houses, especially concerning the control of operations as mentioned by one stakeholder. Thus, it is proposed to include domestic cleaning in the scope in order not to limit a potential market. See Section 2.1 for more details.
Product Group definition and scope	Hospital and disinfection process must be in the scope and considered because the procedures are mainly different while textile products are the same.	Comment partially accepted: Disinfection activities are not proposed to be included inside the scope of the product group as the EU Ecolabel focuses on environmental issues and not health and safety issues. Moreover, many environmental issues have been associated with products used for disinfection. Due to this, only publically accessible areas of hospitals that do not require routine disinfection are proposed to be included within the scope of the product group. See Section 2.1 for more details.
Product Group definition and scope	Schools are not 'commercial' buildings	Comment accepted: The text related to the scope of the product group has been updated and no longer makes reference to schools as commercial buildings. See Section 2.1 for more details.
Product Group definition and scope	This needs to be clearly defined. Sanitising goes beyond cleaning and could involve sterilising etc. Do we want to include such activities? Suggest just cleaning.	Comment accepted: The definitions of sanitary cleaning and sanitisation have been updated in "Terms and definitions". The text related to the product group scope no longer makes reference to "sanitisation" as originally it was included to mean "sanitary cleaning" (the cleaning of sanitary facilities). See Section 2.1 for more details.

Product Group definition and scope	The scope of this project refers to operations that are performed on a daily or weekly basis. Within the operations identified, also “windows cleaning” is mentioned. This operation is however not applicable as such, as glass or window cleaning is not performed on a daily or weekly basis. At most, this only applies for glass doors and some indoor “windows” in walls between offices. It anyhow does not include the interior side of the window glass in buildings.	Comment accepted: The scope of the product group now includes a section that specifically discusses the periodicity of window cleaning and that “routine” window cleaning is cleaning that takes places at most every three months. See Section 2.1 for more details.
Product Group definition and scope	The activities of a cleaning company will not be limited to the scope as it is written now. Most cleaning companies are active in a broader type of cleaning (they also clean the outdoor, fill the toilet roll dispensers, clean windows, company cars, carpets, occasional cleaning tasks,...)	Comment accepted: In order to deal with this issue, a proposal has been made in order to limit the award of the EU Ecolabel on a service-line basis. Thus, a company may have activities that are not covered by the EU Ecolabel scope but these would not be awarded with the EU Ecolabel. See Section 2.2 for more details.
Criteria area 3.2 Cleaning operations/power equipment	Criterion on energy efficiency for hot and jet air dryers is missing. Efficiency of those devices should be compared considering not just the drying capability but the hygiene performances, compared to paper and textile towels. The use of more hygienic way of hand drying should be promoted and criteria for those electric devices is needed in order to avoid an unfair discrimination.	Comment rejected: Hand dryers are not considered to be in scope as these are generally not provided or maintained by the cleaning company (like other consumable goods covered by Criterion M4) and are not used in the delivery of cleaning services (like vacuum cleaners covered in Criterion O3).
Criterion 1 from the 1st Technical Report has been renamed Criterion M1: Use of cleaning products with lower environmental impact (see Section 3.1.1 for rationale)		

<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Scope of criterion</p>	<p>Why are other cleaning products not taken into account like hand dishwashing detergent (HDD), dishwasher detergent, laundry detergent?</p> <p>If a cleaning service washes the cups and glasses of the staff in an office, this could be done the EU Ecolabel HDD.</p> <p>When they wash the uniforms of their staff or the mops that have been used for cleaning, this could also be done with EU Ecolabel products.</p>	<p>Comment rejected: This criterion focuses solely on products that are directly linked to cleaning activities. All auxiliary activities and products that are performed in order to help in the provision of services are covered by Criterion 09: Outsourced auxiliary services and products.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Calculation</p>	<p>When a cleaning service uses household vinegar or soda crystals for cleaning (which are not ecolabelled) this should not be seen as a negative product, it's not because they are not ecolabelled that these products are not good and environmentally friendly cleaning products.</p> <p>A positive list and/or a negative list could be used to avoid that very environmentally unfriendly products are not used by the company.</p>	<p>Comment rejected: In order to facilitate verification, the proposed thresholds are set for products that have been awarded the EU Ecolabel for Hard-surface cleaning products or another ISO Type I Ecolabel. A section discussing this issue can be found the rationale for Criterion M1: Use of cleaning products with lower environmental impact.</p> <p>The establishment of a list of allowed or banned products would also complicate verification as a complete list would be extremely long.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Scope</p>	<p>I suppose reference is made to the old name of the product group and window cleaners, kitchen cleaners, floor cleaners, etc. are included as well?</p>	<p>Comment accepted: The new proposed scope for the criterion covers all products directly related to the routine cleaning activities performed. As such, window cleaners, kitchen cleaners, floor cleaners, etc. are covered by this criterion.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Scope</p>	<p>We agree with this approach if it only applies to general-purpose cleaners and sanitary cleaners. Fortunately there are many products awarded for Ecolabel in the European market.</p>	<p>Comment accepted.</p>
<p>Criterion 1 - Use of cleaning products with lower</p>	<p>How will it be taken into consideration when a company has to use special products following a customer's specification (disinfection in hospitals or kitchen) or because for example the manufacturer of a wooden floor is only liable for defects when using a</p>	<p>Comment accepted: Disinfection activities are excluded by the proposed scope of the EU Ecolabel. therefore the products used for such activities are not covered by this</p>

<p>environmental impacts</p> <p>Scope</p>	<p>special product? In this case, is this customer is inside or outside the scope?</p>	<p>criterion. Thus a company cannot propose an EU Ecolabel service that is performed with products that do not fulfil the requirements for this EU Ecolabel. Other specialised products (e.g. specialised floor cleaners) fall within the scope of this criterion if they are part of the products used routinely to keep an indoor area clean.</p>
	<p>Interesting to see the new phrasing a criterion according to the new directive, but I have a few questions regarding this. As the member states haven't implemented the new directive in national law yet - did you have any discussion about that producing this new criterion? And how do you interpret the article 43 in this matter, according to all the criteria for EU Ecolabel and their link to the subject matter? The way the EU Ecolabel is developed, is the process transparent, non-discriminating and is it open for all stakeholders? And are there any studies on how to interpret a relevant time limit done? And what about the market: are there labelled products in all member states? Are there labelled products in all categories of general-purpose cleaners? Are there any studies made on the market of providers of cleaning services? I suppose that the market mostly are local SMEs? How does that influence the possibility to provide labelled products and the price?</p>	<p>Comment accepted: The first criteria set proposal for EU GPP is now available and is in line with the new procurement directive: no explicit requirements for EU Ecolabel products are included in the text. The Technical Report including the criteria text proposals will be discussed in the 2nd AHWG.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Excluded/limited substances</p>	<p>However, BEUC and EEB call on the Commission to also set criteria for the remaining percent of non-Ecolabel products as those should not contain harmful chemicals.</p> <p>We remind that according to Article 6(6) of Regulation (EC) No 66/2010 the EU Ecolabel may not be awarded to any product that contains substances meeting criteria for classification with the hazard statements specified in Table 2 in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council or substances referred to in Article 57 of Regulation (EC) No 1907/2006. As a consequence, we are convinced that also no service provider should be awarded the EU Ecolabel if he makes use of non-environmental friendly products that contains hazardous compounds as this could damage to the credibility of the scheme. As many of the existing products available on the market cause damages to the environment through air emissions and water pollution, it is essential to ensure their strict exclusion EU Ecolabel cleaning services as the aim of the EU Flower is to go beyond legislation and promote products and services with the best environmental profile.</p> <p>We support the 70% level in the requirement. However, we would like to have a requirement on the rest 30% of the products as well. They should not be classified as CRM Environmentally Hazardous. The documentation should be done with SDS.</p>	<p>Comments accepted: The criterion has been split into two sub-criteria (one for the minimum % of ecolabelled products that must be used, one for the restrictions on non-ecolabelled products as not to allow very danger products to be used). The list of limited substances is based on the work performed during the revision of the EU Ecolabel for Hard-surface cleaning products.</p>

	<p>A second approach could be possible. Why not restrict the use of certain very harmful products or set criteria so that harmful products are not used or as little as possible. Apparently this is also done by the Nordic ecolabel.</p> <p>For example products containing microplastics could be forbidden.</p>	
	<p>Cleaning products containing microplastics scour agents should not be used.</p>	
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Remark</p>	<p>As a general remark, CEPI would urge better data made available on eco-labelled products on the EU market, including product types and market value.</p>	<p>Comment acknowledged.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Threshold</p>	<p>The proposed threshold seems too high, even if the offer on the French market is quite wide.</p> <p>We think that on the market there are already many products marked Ecolabel, we believe that a thresholds of 70% is appropriate but we can consider this percentage as a goal starting from a thresholds of 50% in order to give the opportunity to everyone to adapt to the rules. We have to consider first of all the benefits that the environment could reach if products will be more and more marked Ecolabel.</p>	<p>Comments accepted: Following feedback from cleaning companies, assessment of the market for professional EU Ecolabel cleaning products and other ecolabels, the mandatory threshold is proposed to be lowered (see Section 3.1.1). If a points system is introduced, other, higher, thresholds may be put in place.</p>
	<p>We strongly encourage the JRC to maintain the requirement that cleaning service providers must at least use 70% EU Ecolabelled products in the service they provide.</p>	<p>Comments accepted, nevertheless, as pointed out by other stakeholders, the threshold of 70% might be too high for part of EU28. Thus the threshold is proposed to be lowered.</p>
	<p>Yes it is feasible [a threshold of 70%], but only considering the general purpose cleaners used in routine cleaning services.</p>	
	<p>We support the 70% level in the requirement.</p>	
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Market availability</p>	<p>And what about the market: are there labelled products in all member states? Are there labelled products in all categories of general-purpose cleaners? Are there any studies made on the market of providers of cleaning services? I suppose that the market mostly are local SMEs? How does that influence the possibility to provide labelled products and the price?</p>	<p>Comment accepted: Data related the listed questions have been provided in Section 3.1.1. For more information on price variations between "green" and conventional products, stakeholders are invited to consult the Life Cycle Costing information provided in the Technical Report on the revision of the EU GPP criteria for Cleaning Services.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p>	<p>In the Technical Report it is said that 2.400 general purpose and sanitary cleaners are awarded an Ecolabel. Are these products dedicated for professional use only or does this number include those for household cleaning? In case household cleaners are included:</p>	<p>Comment accepted: No data dedicated to professional-grade products that have been awarded the EU Ecolabel are available but anecdotal data shows that multiple EU Ecolabel product lines for professional-grade cleaning products are available. This</p>

Market availability	How many of them are meant for professional use?	information has been added to the report.
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Professional products on the market</p>	<p>The Ecolabel standard certifies only products for ordinary cleaning (such as window cleaners, all purpose cleaners, laundry detergents, dishwasher detergents, hand dishwasher detergents). It doesn't allow certification to a lot of super-concentrated products with professional dosing systems, widely used by cleaning contractors.</p> <p>Moreover extraordinary cleaning products (such as paint removers, detergents, solvents, wax removers, metalized wax, etc.) are not allowed to get certification by the actual Ecolabel standard.</p> <p>That's the reason why the percentage of 70% of EU Ecolabel for general purpose cleaners and sanitary cleaners is extremely strict to permit a correct execution of the professional cleaning services.</p> <p>Afidamp proposes to study a new Ecolabel standards focused on professional chemicals specialties based on the Italian C.A.M. standard (M.E.C. minimum environmental criteria – D.L. 12 may 2012) by which it allows to require a percentage of 100% of Ecolabel products.</p>	<p>Comments partially accepted: The threshold for ecolabelled products is proposed to be lowered, in order for applicants to have more flexibility in the products they choose to use.</p> <p>Cleaning operation that would use "extraordinary cleaning products" (e.g. pain removers) are not included in the scope for the EU Ecolabel for Cleaning Products and as such these types of products should not be used in the provision of EU Ecolabel services.</p> <p>At the time of the development of this criteria, there are no plans for the development of a specific EU Ecolabel for professional hard-surface cleaning products as currently multiple professional-grade cleaning products have been awarded the EU Ecolabel with the criteria that is both valid for domestic and professional products.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p>	<p>At the moment: the share of Ecolabel products in facility management is at approximately 3.5 %. A share of 70 % for all purpose cleaners and sanitary cleaners is technically achievable. Due to different performance characteristics a too high consumption of products cannot be excluded. This criterion will impact on procurement costs. The setting of a quantitative target can be seen as a political issue.</p> <p>According to this criterion, "at least 70% by volume of general-purpose cleaners and sanitary cleaners used by the cleaning service provider shall have been awarded with the EU Ecolabel or with another ISO Type I Ecolabel".</p> <p>Is the 70% volume referred to all cleaning contracts of a company, independently from the fact if the cleaning activity is in or outside the scope? Actually in Germany, only about 3.5% of eco-labelled cleaning products are in use. It will be therefore difficult to reach a 70% threshold. In case the solution to purchase from a greater variety of cleaning products would be to buy them from other countries, it must be taken into account that cleaning products have to be labelled in the national language, as the manufacturer has to provide safety data sheets etc. in the national language (see: Ordinance on Hazardous Substances or Guidance on Labelling and Packaging in</p>	<p>Comment partially accepted: It should be noted that the EU Ecolabel only aims to highlight the top performers, therefore it is not expected that all companies throughout Europe should use ecolabelled products. The figure of 3,5% of products used being ecolabelled is an average, with some companies using high percentages of ecolabelled products and other companies using none. It is those companies using high percentages that are the aim of the EU Ecolabel.</p> <p>The text of the scope of the product group has been updated clearly delineating the fact that the EU Ecolabel concerns service lines and as such only the products used by this service line should be counted towards the percentage and not all the products used by the company.</p> <p>The threshold has also been lowered in order to offer more flexibility to applicants.</p>

	<p>accordance with Regulation (EC) No 1272/2008: „CLP requires the label to be written in the official language or languages of the Member States(s) where the substance or mixture is placed on the market, ...”). In addition, transportation throughout Europe is not eco-friendly!</p> <p>The 70% percentage is much higher than the 50% percentage referred to in the Nordic Ecolabel: Despite the lower threshold, in Sweden only 1% of cleaning companies have reached the Nordic Ecolabel in 10 years of its existence. How do you expect a significant bigger impact on the European Cleaning market and more companies to reach for an Ecolabel with such a high threshold of 70%?</p>	
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Assessment and verification</p>	<p>We should consider that some of the cleaning companies are very small. How will they collect the necessary evidence with the lowest administrative burden possible?</p> <p>The assessment and verification of this criterion is not possible. The typical purchasing routine in a cleaning company is that the person responsible for a cleaning contract on a given site/property can order cleaning products out of a list. In no way this person has an overview of how many eco-labelled products have been purchased in a given time in the company as a whole. How can a company therefore monitor the ordering of dozens or in some cases hundreds of cleaning products by its employees in order to keep the thresholds in the reporting year?</p>	<p>Comments accepted: The documentation required for the assessment and verification of this criterion is just annual data such as invoices or site inventories for the EU Ecolabel service line, indicating what are the volumes of products and if they are ecolabelled. It is proposed that the User Manual shall include a table helping with the calculations in order to assure that the percentages are calculated correctly.</p> <p>As this information is to be provided on a service-line basis, the company will most likely have to appoint a person responsible to oversee the products used and report on an annual basis back to the Competent Body.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p>	<p>You are not stimulating the companies to use as little cleaning product as possible by setting a by volume limit. They should be encouraged to use as little cleaning products as possible, and if cleaning products are used EU Ecolabel products or other environmentally friendly products should be the preferred option.</p>	<p>Comment acknowledged: It is considered that professionals in the sector are knowledgeable in the amount of products that is necessary to obtain good results and setting a maximum limit on this amount might be a hindrance. Moreover, it is in the financial interest of a company to minimise product use as much as possible.</p>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p> <p>Assessment and verification</p>	<p>By referring to volume we may discriminating against concentrated products that are being utilised by the cleaning services provider. It also contradicts Criterion 3.</p> <p>Why by volume? We are stimulating the use of ready-to-use (RTU) or poorly concentrated products. When a company uses and EU Ecolabel RTU window cleaner this will make it easier to reach the 70% by volume then if they use a highly concentrated window cleaner that has to be diluted prior to use.</p> <p>70 % refers to the volume of cleaning products. The use of concentrates will not be promoted automatically by this: to reach the volume of 70% a company applying for the Ecolabel could come to the conclusion to purchase eco-labelled products as non-concentrates (which means = higher volume) and to purchase non-labelled products as concentrates. So „70%“ of the cleaning products will lead to transportation of a lot of</p>	<p>Comments accepted: Three options were studied for the calculation of the threshold of ecolabelled products used, volume at purchase, in-use volume and active content (see "Assessment and verification" of the rationale of Section 3.1.1). While the "volume at purchase" approach has flaws, it was deemed as adequate for the assessment and verification of the criterion.</p> <p>Concerning undiluted ecolabelled products and the fact that Criteria M1 and O1 could not be met at the same time, the EU Ecolabel criteria for Hard-surface cleaning products is proposed to be updated in order to allow more undiluted products to be awarded with the EU Ecolabel, as such their market should increase. Moreover, the threshold for Criterion M1 is proposed to be lowered to 50%, therefore it will be easier for applicants to meet both criteria, if they wish to do so (Criterion O1 is optional).</p>

	water and the not-labelled products will be transported as concentrates, which can lead to a higher amount of hazardous compositions – just to get a better rate of eco-labelled products with regard to the volume.	
Criterion 1 - Use of cleaning products with lower environmental impacts	Criterion 1: Use of cleaning products with lower environmental impact We agree with this criterion.	Comment accepted.
Criterion 2 from the 1st Technical Report has been renamed Criterion O2: Use of cleaning accessories with lower environmental impact (see Section 3.2.2 for rationale) and all consumable goods are now covered by Criterion M4: Consumable goods.		
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<p>Suggested proposal: "A percentage of paper and textile cleaning supplies and accessories used by the cleaning service provider shall have been awarded with the EU Ecolabel or with another ISO Type I ecolabel. The percentage for all cleaning supplies shall be at least 50%, in those areas where there are limited supply of ecolabelled products applicants should be able to use non ecolabelled products which meet the relevant criteria"</p> <p>Rationale: 1) The percentages used in the draft are primarily based on the Nordic Swan criteria. However the situation with regard to the Nordic Swan is not representative of Europe as a whole. The penetration of type 1 ecolabel in the Nordic region is very high as compared to other regions of Europe hence the levels would not be reasonable or practical on a European basis. For example according to the Nordic Swan data it is one of the most well-known trademarks in Sweden with 96 % of Swedes both recognizing and understanding what it stands for. In Finland, the Swan label is the 5th recognized trademark. Until this is resolved it should be set at a more achievable level.</p> <p>2) There is no inherent logic for a differential rate between product types. The value of using an ecolabelled product for each type of cleaning supply should be seen as equivalent. This is particularly important when (as in this case) the products perform similar or complimentary tasks. If this is not the case it could lead to a situation where in order to achieve cleaning services ecolabel an applicant chooses a product type</p>	Comments accepted: for conThe levels set for the thresholds are proposed to be identical and lowered.

	<p>requiring less ecolabelled products.</p> <p>3) There will be areas or regions with shortages of ecolabelled products, cleaning services providers in those areas should not be excluded if they can show they use products with a similar environmental burden.</p>	
	<p>Afidamp think that the percentage of 70% of EU Ecolabel for mops and clothed is too high if related to the percentage of items with EU Ecolabel existing on the market. At the moment very few companies have such items and the risk is to favourite those big companies which have more economic resources.</p> <p>We think that EU Commission should give time to the market, and to the smaller companies, to start the process of certification.</p> <p>For this reason Afidamp ask to reduce the percentage of EU Ecolabel for mops and clothes to 50%.</p>	
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<p>BEUC and EEB welcome this criteria. We are in favour of demanding 100% of papers used are awarded the EU Ecolabel and 70% for textiles such as towels, cloths and mops. We are aware that it might be difficult to fulfil as there is no EU Ecolabel mops for now, but we believe that the cleaning services criteria will create a market for ecolabelled cleaning textiles.</p>	<p>Comments partially accepted: While it is important to create a market for ecolabelled cleaning textiles, their market availability has been shown to be too restricted to set a threshold at 70%. Due to lack of availability throughout the EU28, it is also proposed to lower the threshold for paper products (they are now covered in Criterion M4: Consumable goods).</p>
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<p>We advise the procurement units to procure consumables (paper towels, mugs, and soap for the toilets) separate to cut costs and to be able to make a better procurement. Cloths and mops are included in the service.</p>	<p>Comment acknowledged. For consumable goods in the EU GPP criteria, please consult the EU GPP report.</p>
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<p>Where eco-labelled products are not accessible, also product which is not labelled should be allowed if the supplier is able to demonstrate that the environmental performance meets the Ecolabel criteria applicable to the product.</p>	<p>Comment rejected: In order to facilitate assessment and verification, it is requested that applicants demonstrate that the products used have been awarded the EU Ecolabel or another ISO Type I Ecolabel.</p>
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<p>This criterion should be a point's requirement. The level of ecolabelled tissue paper should be 90%. The requirement should also cover soaps. The requirement should only be valid in cases where the cleaning company actually refills the toilets and the wording should be: "A percentage of purchased paper and..."</p>	<p>Comments accepted: as the criteria have been highly reworked, multiple changes suggested in the comment were taken up.</p> <p>The criterion on textile products is now an optional criterion (part of point system) with</p>

	<p>General: Maybe the whole criteria set can be partially be a point system to give companies some flexibility due to the differences between companies and between their clients. The availability of ecolabel products also varies a lot between countries.</p> <p>Drying paper: 100% seems to be quite strict, there could always be practical constraints that we are not aware of that not allow the use of EU Ecolabel paper products. A point system could be more practical.</p> <p>Textile hand towel rolls: I'm not aware of the presence of ecolabelled hand towels rolls, they don't fall into the EU Ecolabel scope to my understanding. The availability is these products is extremely low in Belgium and probably also in other countries.</p> <p>Cloths and mops: They can be EU Ecolabelled but to my understanding the availability is zero or extremely low in Belgium. The set limit is much too high. A point system could reward the companies that do use these products.</p> <p>We agree with this approach but in all cases there is an economic impact caused by increased cost in these products which in some cases can reach 70%. We therefore recommend a significant reduction in the thresholds by 50% in all cases.</p> <p>« Drying paper (paper towels and toilet paper) shall be at least 100%.”: “at least” is not useful in this sentence!</p> <p>The thresholds for textile products are not feasible in France, since we have nearly 0 EU ecolabelled products on French market.</p>	<p>lower thresholds and the other products mentioned are covered by Criterion M4: Consumable goods. The thresholds are proposed to be lowered for consumable goods as the availability of ecolabelled paper and textile products has been found to be limited throughout the EU28.</p>
<p>Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact</p>	<p>We agree on the requirement of 100% of ecolabelled drying paper. We think that could be difficult to fulfil the criterion on textiles, because of the lack of products in the European market. We propose to delete this sub-criterion by the moment.</p>	<p>Comments partially accepted: While the market presence of ecolabelled textiles is still limited, it is proposed to allow flexibility to the applicant by making the criterion optional and by lowering the thresholds from 70 to 50% and not by removing the criterion.</p> <p>For paper products, they are now tackled in Criterion M4: Consumable goods but market availability throughout the EU28 has been found to be too low to ask for 100% for ecolabelled products.</p>

<p>Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact</p>	<p>This criterion doesn't seem to be in line with the scope. The scope considers cleaning of spaces. It is not talking about refilling the paper towel dispensers. If the refilling of paper towels or soap dispensers or distribution of toilet paper are in the scope, this should be made clear from the beginning. If they can refill paper towel dispensers, then I believe washing coffee mugs could be part of the scope as well.</p>	<p>Comment accepted: The text of this criterion has been reworked and only deals with cleaning accessories which are used directly in the cleaning operations. Consumable products are now covered by Criterion M4: Consumable goods.</p>
<p>Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact</p>	<p>Other supplies and accessories to be included</p> <p>We believe in order to have a service ecolabel which does not lend itself to potential misuse; all products meeting a specific use should be included in the relevant criteria</p> <p>Given this it is surprising that there are no specific requirements in the criteria to ensure air driers meet the relevant requirements. This is particularly relevant as any ecolabel is required to include health and safety aspect. There is growing body of peer reviewed evidence that many air-dryers are inferior to paper or textile in regard to hand and washroom hygiene.</p> <p>For example;</p> <p>http://authors.elsevier.com/sd/article/S0195670114002461 http://www.journalofhospitalinfection.com/article/S0195-6701(14)00372-7/abstract</p> <p>As the service given by the different drying technologies is not just removal of liquid, but also an integral part of the process of removing bacteria from hands, there should not be an assumption that air -dryers meet these requirements, but the ecolabel should include clear requirements that they have at a minimum the same level of hygiene and environmental performance as textile or paper ecolabelled products.</p> <p>We also notice that the criterion does not mention hot and/or jet air dryers.</p>	<p>Comment rejected: The text of this criterion has been reworked and only deals with cleaning accessories which are used directly in the cleaning operations, thus all products related to hand drying are now covered in Criterion M4: Consumable goods.</p> <p>Moreover, hand dryers are not considered to be in scope of any of the criteria in the EU Ecolabel as these are generally not provided by the cleaning company unlike other consumable goods and the primary focus of the EU Ecolabel is not health and safety.</p>
<p>Criterion 2 - Use of cleaning supplies and accessories with lower environmental</p>	<p>The criterion puts in place an unfair discrimination between paper and towel products. We ask that the same % of eco-labelled products is required for both material. We also notice that the criterion does not mention hot and/or jet air dryers.</p>	<p>Comment rejected: The criteria for such products are mainly set based on the availability of ecolabelled products on the market. Ecolabelled paper products have a much higher availability than ecolabelled textile products, where the availability for hand</p>

<p>impact</p>	<p>We do not understand why JRC asks for different percentage of EU Ecolabel for drying paper (100%) and for Textile hand towel rolls (50%) because both of them have the same task: dry hands.</p> <p>For this reason the two items actually compete each other and, usually, where we find the first we don't find the second and vice versa.</p> <p>For this reason the different percentage is not acceptable according to the market rules because it would be favourite that good with a lower percentage of Ecolabel requirement.</p> <p>That's why we ask same EU Ecolabel percentage (50%) for paper and textiles.</p>	<p>towel rolls is unknown but considered to be very small. As such, it is proposed not to set requirements for textile consumable products and limit the requirements for paper products to 50% of ecolabelled products.</p> <p>See Section 3.1.4 (Criterion M4: Consumable goods) for further details.</p>
<p>Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact</p>	<p>It is necessary to specify the unit of the annual reporting. We suggest to use the unit intended as number of pieces of an articles</p>	<p>Comment accepted: A new proposal is made for the assessment and verification of the criterion that requests for annual data regarding the number of products (pieces) used in the cleaning tasks.</p> <p>See 3.2.2 for further details.</p>
<p>Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact</p>	<p>Many of these cleaning supplies and accessories are subject to restrictions imposed by the customer. Very often the vast majority of paper products underlie specification of the customers, especially depending on the dispensers in use. Furthermore, costs of paper products are calculated into the price of the service provision in most cases. Therefore, a company that wants to reach the Ecolabel has to purchase 100% eco-labelled paper although perhaps only a small percentage of their customers require the Ecolabel and – even more important - is willing to pay higher prices or use “grey” toilet paper.</p> <p>The assessment and verification of this criterion is not possible because of the customers' specification. How should a company be able to proof the demanded percentage at the end of the year, in case he wins a new contract in that given year while this customer specifies paper products without Ecolabel (same is true for wooden floor cleaning, etc.)?</p>	<p>Comment partially accepted: The texts of criterion on consumable goods (Criterion M4: Consumable goods) as well as to who can apply have been updated. The thresholds for consumable good are also proposed to be lowered.</p> <p>While it is true that the clients often dictate which products are supplied, it can be expected that if they choose an EU Ecolabel service, they would be favourable to requesting the provision of ecolabelled consumable goods.</p>
<p>Criterion 3 from the 1st Technical Report has been renamed Criterion 01: Use of concentrated undiluted cleaning products</p> <p>(see Section 3.2.1 for rationale)</p>		
<p>Criterion 3 - Cleaning product concentration at</p>	<p>Yes it is feasible but probably we will not find a lot ecolabelled cleaning products.</p>	<p>Comments partially accepted: The products referenced in this criterion do not have to ecolabelled, even though the requirements in the criterion are proposed to be changed</p>

<p>purchase</p> <p>Availability of ecolabelled products</p>		<p>(from 30% AC to a 1:80 dilution rate) and the scope of the EU Ecolabel for hard-surface cleaning products is proposed to be expanded to more undiluted products, which will most likely increase the availability of EU Ecolabel undiluted products on the market.</p>
<p>Criterion 3 - Cleaning product concentration at purchase</p>	<p>According to this criterion, "at least (...) % by volume of all cleaning products purchased shall be concentrated with at least 30% of active substance". A company could use the non-eco-labelled products as concentrate for reaching this criterion! Furthermore, it could then reach a better ratio between the volumes of labelled and non-labelled products (see comments on criterion 1). Finally, concentrates lead to a higher number of products that have to be labelled according CLP, special storage, special safety precautions, etc.</p>	<p>Comments partially accepted: The threshold proposed for this criterion is lower than the amount of non-ecolabelled products that can be used according to Criterion M1 – it is expected that some undiluted products will not be able to comply with EU Ecolabel/other ISO Type I Ecolabel requirements. In order to ensure that the undiluted products used are not extremely dangerous, it is proposed to have a second requirement in Criterion M1 addressing the issue CLP labelling.</p>
<p>Criterion 3 - Cleaning product concentration at purchase</p>	<p>This criterion corresponds to manufacturers rather than to cleaning services because it corresponds to the manufacturer sell concentrated cleaning products that can be used easily by the cleaning staff (although we agree that used products should be awarded with the Ecolabel). This criterion has not been defined the threshold (%). Regarding the 30% of active substance, we considered it feasible although in our opinion, the most important issue is to advance in dosing systems and in a rational use of chemicals.</p>	<p>Comments acknowledged: The criterion has been updated, indicating a threshold and cleaning product dosage and the use of dosing systems is now covered by Criterion M2: Cleaning product dosage.</p>
<p>Criterion 3 - Cleaning product concentration at purchase</p>	<p>Demand for the use of highly concentrated products is politically motivated. In larger projects this can provide benefits. However, here is a contradiction to criterion 1: i) highly concentrated products are normally stricter labelled / lower acceptance by "less" informed customers who want bold solutions, such as Eco certificates; ii) the implementation of a minimum percentage value, which would be useful, is difficult to assess</p>	<p>Comments acknowledged: The criterion text has been reworked to make verification easier (no long refers to active content). Concerning point i), it is proposed that this criterion should be part of the point system and it is up to the applicant to see if their customers want concentrated undiluted products to be used or not.</p>
<p>Criterion 3 - Cleaning product concentration at purchase</p>	<p>We would like a more elaborated and detailed criterion on the cleaning product concentration at purchase. We strongly support the approach requiring at least 30% active substance in the products purchased. A use of more concentrated products will mean a lower impact connected to the transport of products as more concentrated products last longer and require smaller recipients. For professional users good instructions and personal safety equipment can be given on how to handle the products in a safe way.</p>	<p>Comments accepted: The criterion text has been updated with a threshold and a new calculation method. For all products, a criterion covers appropriate dosage and the criterion on staff training also covers aspects such as health and safety.</p>
<p>Criterion 3 - Cleaning product concentration at purchase</p> <p>Calculation</p>	<p>Our experience is that this criterion is difficult to verify. The supplier's don't want to tell how much water there is in their products so it is very time consuming to get the documentation. It is not written on the packaging or SDS. The way Swan criteria is constructed promotes both the decreased amount chemicals used and the use of concentrates</p>	<p>Comment accepted: It is proposed to calculate the percentage based on volume-at-purchase. It was considered for a time that it might be possible to calculate the amount of active content based on the information on Safety Data Sheets but not all active substances are required to be listed there. Moreover, the dilution rate is a much easier</p>

	<p>Before we set a threshold it should be made clear how this will be calculated. Only producers have access to the actual composition. Will the calculations be based on the ingredients listed on the label (that are always broad ranges)? Or in another way? Which ingredients shall be considered as active substance? All ingredients including perfumes and opacifiers or only the surfactants?</p>	concept to understand and calculate.
	How should we calculate?	
<p>Criterion 3 - Cleaning product concentration at purchase</p> <p>Point system</p>	<p>This criterion could also be part of the point system.</p> <p>A minimum threshold combined with a point system could provide flexibility and reward the frontrunners.</p>	Comments accepted: This revision proposes for the criterion to be optional (part of the point system).
<p>Criterion 3 - Cleaning product concentration at purchase</p>	<p>Criterion 3: Cleaning product concentration at purchase</p> <p>We agree on this criterion.</p>	Comment accepted.
<p>Criterion 4 from the 1st Technical Report is proposed to be removed in this report</p> <p>(see Section 1.3 for rationale)</p>		
<p>Criterion 4 - Recycled content in disposable cleaning supplies</p> <p>Consumable goods</p>	We advise to procure the consumables separate to cut cost and make a better deal.	Comment acknowledged: discussion with companies in the sector yielded that while some contracting parties do prefer to procure consumable goods separately, many cleaning service contracts do include consumable goods and thus there is a criterion dealing with the issue.
<p>Criterion 4 - Recycled content in disposable cleaning supplies</p> <p>Recycled content and ecolabels</p>	<p>BEUC and EEB welcome this criterion and support the use of plastics with recycled content. We believe that it is feasible for example for waste bags.</p> <p>Bin liners: we could promote recycled content. This could be a criterion part of the point system. Sometimes bin liners need to have certain colours to enhance correct recycling. So sufficient flexibility should be given so the right bin liner can be found for each type of use. The amount of recycled content in a bin liner can vary.</p>	<p>Comments accepted: As part of the revision work, the possibility of requiring bin bags, among other items, containing recycled material was studied. Such requirements are difficult to verify though, even using ecolabels for bin bags and/or products containing recycled plastics (which remain, for the moment, very limited throughout Europe and very few products have been certified).</p> <p>See Section 3.2.2 (Criterion 02: Use of cleaning accessories with lower</p>

	<p>It is not at all clear what is meant by “recycled content”. Furthermore, the availability of these “contents” is limited and they are expensive. This criterion is therefore not applicable.</p> <p>There are few manufacturers of these products and they are expensive. We agree to use -whenever possible and permitted by costs- recycled plastic products, but we believe that this criterion corresponds to manufacturers rather than to cleaning services.</p> <p>We would like to mention the existence of NF ENVIRONMENT MARK (French ecolabel) - WASTE SACKS</p> <p>We agree with this approach for some plastic products that are broadly available in market as trash bags.</p> <p>The tenders of the framework agreement that centralised the purchasing of cleaning services of the Ministries and some public companies of the Government of Catalonia and other local administrations include a criterion on recycled content in plastic trash bags.</p> <p>It is necessary to set a percentage of recycled content. It does not exist in the market trash bags with 100% of recycled plastic. In fact, ecolabels that have a product group for plastic trash bags as Blue Angel and Catalan Ecolabel require 80% of recycled plastic.</p> <p>It is better to develop a known Ecolabelling criteria for cleaning accessories and supplies in another project and then in this criteria require that they are ecolabelled. Therefore, take this criterion out.</p>	<p>environmental impact) for a discussion on bin bags and recycled content in products.</p>
<p>Criterion 4 - Recycled content in disposable cleaning supplies</p> <p>Paper products</p>	<p>These criteria should not include paper. The environmental balance between using recycled fibre versus certified virgin fibre depends more upon availability and location than on the burden of each type of raw material.</p> <p>This criterion is not feasible as the environmentally most favourable raw material depends on the location and context of the production site which dictates the availability of raw materials (in case of paper certified virgin or recycled fibres, or a combination of both).</p>	<p>Comment acknowledged. The original scope of the criteria focused on plastic products and the new proposal (Criterion 02: Use of cleaning accessories with lower environmental impact) also does not consider paper products.</p>

<p>Criterion 4 - Recycled content in disposable cleaning supplies</p> <p>Gloves</p>	<p>Are gloves with recycled content available?</p> <p>It could be a bonus criterion. But I'm not sure their impact is very relevant. Gloves are used for safety reasons so their use should not be restricted.</p> <p>We should be careful about restricting these in certain situations e.g. use in hospitals or other similar institutions where they are required in order to maintain a certain level of cleanliness.</p>	<p>Comment accepted: Gloves are, indeed, important for health and safety reasons, thus it is proposed to address the use of single-use gloves in staff training and not require that they be partially be made of recycled materials.</p>
<p>Criterion 4 - Recycled content in disposable cleaning supplies</p> <p>Biodegradable bags</p>	<p>The chapter focuses on recycled plastic content in disposable cleaning supplies. Further emphasis should be given to disposable plastic supplies which are biodegradable according to DIN EN 13432. Bio-based feedstock for biodegradable plastics would additionally reduce resource depletion. Biodegradable disposals can be used for bio waste. They could reduce environmental impact and improve the opportunities for waste separations.</p>	<p>Comment accepted: a potential requirement for biodegradable content was studied for this criterion but it came to light that currently few certified schemes offer such bin bags and sometimes companies would have to have the bags they use tested, which could result in extra costs. Thus it is not proposed to include such a requirement.</p>
<p>Criterion 4 - Recycled content in disposable cleaning supplies</p> <p>Disposable cloths</p>	<p>Should we try to limit the use of disposable cleaning supplies? Like disposable cloths used for dusting? They aren't mentioned.</p>	<p>Comment accepted: the issue of disposable cloths is partially addressed through Criterion M3: Use of microfiber products (which requires a certain amount of cloths and mops to be made of microfibre) and also through Criterion M5: Staff training (which ensures that staff are trained to favour durable accessories, where possible).</p>
<p>Criterion 5 from the 1st Technical Report is proposed to be removed in this report and the issues it tackled to be covered by Criterion M3: Use of microfiber products and Criterion O2: Use of cleaning accessories with lower environmental impact</p> <p>(see Section 1.3 for rationale)</p>		
<p>Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies</p>	<p>In case of wipes, it is important to take into consideration that paper is recyclable and non-woven dry paper (air-laid) wipes can be reused.</p>	<p>Comment partially accepted: For paper products to be recycled, they must be correctly disposed of and that is taken into consideration in Criterion M5: Staff training. In that same criterion, the use of single-use supplies such as paper cloths is covered.</p>
<p>Criterion 5 - Purchase of more durable and reusable cleaning accessories and</p>	<p>We fully support this criterion as this is a way to reduce solid waste. However, the definition of a short-life product should be clearly stated.</p> <p>We don't understand which kind of things are meant with this criterion.</p>	<p>Comments accepted: In order to remove ambiguity about the scope of the criteria, it is proposed to always indicate precisely which products are concerned in the two criteria introduced to replace this criterion. Thus, for example, Criterion O2 states that only</p>

<p>supplies</p> <p>Scope and Definition</p>	<p>There is no possibility how to categorize these products or how to prove compliance with this criterion. This criterion is therefore not applicable.</p> <p>No comments on it until we have more information about.</p>	<p>cloths and mops are concerned.</p>
<p>Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies</p>	<p>In this approach we do not see its utility neither how to categorize these products nor how to prove compliance with this criterion, therefore, we propose to delete it.</p>	
<p>Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies</p>	<p>This criterion should be made much clearer. It should be made clear in which cases the use of single-use cleaning supplies is necessary and when a re-usable alternative is possible (and more environmentally friendly).</p>	<p>Comment accepted: This aspect is now proposed to be covered in Criterion M5: Staff training and, as such, the cleaning company management can determine what is best for their practice while still promoting the use of reusable products.</p>
<p>Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies</p> <p>Health and safety</p>	<p>Proposed addition to the criteria:</p> <p>It should include a requirement that any increase in usage of reusable products must take into consideration the potential increase in health and hygiene risk to cleaning operatives and the general public, with particular emphasis on the cleaning of the reusable product prior to reuse.</p> <p>Rationale:</p> <p>The Ecolabel regulations require the criteria to take into consideration- “Net environmental balance between the environmental benefits and burdens, including health and safety aspects”</p> <p>There is significant body of evidence that shows risks if proper cleaning and hygiene procedures are not observed.</p> <p>The concern in this area is supported by a number of important institutions. For example the ECDC is concerned cross contamination and recommends the use of single use products to dry hands in schools and nurseries in order to avoid the transmission of gastrointestinal infections. http://www.ecdc.europa.eu/en/healthtopics/food_and_waterborne_disease/communication_toolkit/Pages/index.aspx</p> <p>As one would expect there has been numerous studies on hospital cleaning –although the more specialised cleaning is out of scope of this ecolabel the studies also cover</p>	<p>Comment partially accepted: It is proposed to address the use of supplies such as single-use gloves and paper cloths through Criterion M5: Staff training. Thus, the staff should be instructed in the correct (from a health and safety viewpoint) and most environmentally efficient way of using such products.</p>

more routine cleaning. These show for example; “Detergent-based cleaning might remove microbes, but will not necessarily kill them. There are numerous examples of contaminated cleaning cloths and equipment actually spreading microbes across surfaces rather than removing them [11, 64–67]. Disinfectants are more effective at killing pathogens, particularly bacterial spores, but they tend to be expensive and environmentally unfriendly [3, 68].” <http://www.cleaning-for-health.org/files/2011/08/Hospital-cleaning-in-the-21st-century.pdf>

For cleaning tasks related to household type cleaning there is evidence of the risk.

Research carried out over the last 30 years has shown sensitive areas of kitchens and toilets are contaminated by pathogens such as E. Coli, Salmonella sp. Staphylococcus aureus, Campylobacter species, etc. Studies have shown consistently that dishcloths, rags and sponges used to clean the kitchen and bathrooms harbour bacteria and can spread.[i] It has also been shown that rinsing the cloth alone is not sufficient to remove the harmful bacteria; a study by Hilton and Austin in 2000 evaluated transfer of microorganisms from un-rinsed and rinsed cloths and sponges taken from domestic homes and inoculated with Type108 E. coli. It showed that rinsing of clothes and sponges produced a significant reduction in the numbers of organisms transferred to a chopping board surface, but even where rinsed cloths were used, significant numbers of organisms (in the range of 10,000 – 100,000) were still recovered from surfaces after wiping.[ii]

In a recent report (March 2012) published by EFSA (European Food Safety Authority) they state that a total of 5,262 food-borne outbreaks were reported in the European Union in 2010, causing 43,473 human cases, 4,695 hospitalisations and 25 deaths. Most of the reported outbreaks were caused by Salmonella, viruses, Campylobacter and bacterial toxins. In the EFSA’s fact sheet on food borne diseases, one of their key recommendations to combat these diseases is

“Good kitchen hygiene which can prevent or reduce the risk posed by these micro-organisms.”[iii]

It is this risk posed by contamination of reusable products that has caused many organisations to recommend the use of single use tissue paper products to minimise any cross contamination. A good example of this is the UK NHS as part of their living well campaign.[iv]

[1] <http://www.ifh-homehygiene.org/IntegratedCRD.nsf/111e68ea0824afe1802575070003f039/5C19993>

	<p>OF8EF1B49802579A70045ECAB/\$File/Role%20of%20hygiene%20in%20reducing%20the%20risk%20of%20infection_17022012.pdf</p> <p>ii Hilton AC, Austin E. The kitchen dishcloth as a source of and vehicle for foodborne pathogens in a domestic setting. International Journal of Environmental Health Research 2000;10:257-261</p> <p>iii http://www.efsa.europa.eu/en/corporate/doc/factsheetfoodbornezoonoses.pdf</p> <p>http://www.efsa.europa.eu/en/efsajournal/pub/2597.htm</p> <p>iv http://www.nhs.uk/Livewell/homehygiene/Pages/prevent-germs-from-spreading.aspx</p> <p>[i] http://www.ifh-homehygiene.org/IntegratedCRD.nsf/111e68ea0824afe1802575070003f039/5C19993OF8EF1B49802579A70045ECAB/\$File/Role%20of%20hygiene%20in%20reducing%20the%20risk%20of%20infection_17022012.pdf</p> <p>[ii] Hilton AC, Austin E. The kitchen dishcloth as a source of and vehicle for foodborne pathogens in a domestic setting. International Journal of Environmental Health Research 2000;10:257-261</p> <p>[iii] http://www.efsa.europa.eu/en/corporate/doc/factsheetfoodbornezoonoses.pdf</p> <p>http://www.efsa.europa.eu/en/efsajournal/pub/2597.htm</p> <p>[iv] http://www.nhs.uk/Livewell/homehygiene/Pages/prevent-germs-from-spreading.aspx</p>	
	<p>Similar to the hygiene concerns expressed above, durability vs. short life product choice should be determined by functionality and hygiene only – durability if contributing to spreading of microbes from one cleaning area to others cannot be sustainable. This essential consideration seems to be omitted in some of the reference evidence.</p>	
<p>Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies</p>	<p>This is certainly a good criterion, it is necessary to provide and choose textile products with high washing resistance (see criterion n. 23 of EU Ecolabel textile products 201/305/UE).</p>	<p>Comment accepted: A requirement regarding the use of EU Ecolabel textile accessories has been introduced in Criterion O2: Use of cleaning accessories with lower environmental impact.</p>

Textiles		
<p>Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies</p> <p>Impregnated mops</p>	<p>anyway this criterion is not always relevant, if we consider the sweeping operation before washing the use of impregnated cloths is less impacting on the environment than the washable mops if we consider waste water and energy to wash them . In this case we think that the use of impregnated cloths could be better, please note that 20.000 square meters cleaned have an impact on the environment of 2,5 kg of waste.</p>	<p>Comment acknowledged: The use of mops (impregnated or not) are considered in the criteria M3 (use of microfiber products) and O2 (use of cleaning accessories with lower impact impact). Moreover, consultation with stakeholders after the 1st AHWG meeting yielded that impregnated mops are not commonly used throughout Europe.</p>
<p>Criterion 6 from the 1st Technical Report has been renamed Criterion M3: Use of microfiber products (see Section 3.1.3 for rationale)</p>		
<p>Criterion 6 - Use of cleaning cloths, mops and rags</p> <p>Scope and definition</p>	<p>This criterion is too vague and should be clarified (“which lead to reduced water”), even the title is not explicit.</p> <p>We believe that the fulfilment to this criterion is difficult to verify, especially with regards to the measurement or estimation of the volume of water.</p> <p>We indeed support microfiber and believe that incentives should be given to companies using microfiber cloths and supplies.</p> <p>Please write it out clearly what you mean. In an assessment situation a handling office should not need to make a decision if a cloth lead to reduced water use or not. If you mean micro fibre cloth then write it.</p> <p>This criterion is not quite clear and seems to be hard to verify. I suppose is to promote the use of microfibers.</p> <p>Staff training concerning this issue could be an added value.</p>	<p>Comments accepted: The criterion has been reworked in order to be more precise – it concerns the use of microfiber products and is verified by looking at the quantities of products purchased – see Section 3.1.3.</p>
<p>Criterion 6 - Use of cleaning cloths, mops and rags</p>	<p>No comments on it until we have more information about.</p>	
<p>Criterion 6 - Use of cleaning cloths, mops and rags</p> <p>Threshold</p>	<p>We think that it could be possible to set a threshold considering the 50% of the total purchases.</p>	<p>Comment accepted.</p>

<p>Criterion 6 - Use of cleaning cloths, mops and rags</p>	<p>Currently it has been estimated that 10% of purchases of cloths, mops and suitable rags could help reducing the use of water and cleaning products, but this criterion should be applied to clean large surfaces not for all types of cleaning. Cleaning services usually used microfiber because it is the most modern product in the market but other types of products may appear in a future. In general we do not see the utility of this approach neither how to categorize these products nor how to prove compliance with this requirement.</p>	<p>Comment accepted: The criterion has been updated to refer to microfiber products explicitly in order to remove ambiguity and interpretation errors. If a new technology appears on the market that is more environmentally performant, the criteria will have to be updated and this is foreseen in the EU Ecolabel scheme.</p>
<p>Criterion 7 from the 1st Technical Report has been renamed Criterion M2: Cleaning product dosage (see Section 3.1.2 for rationale)</p>		
<p>Criterion 7 - Cleaning product dosage</p> <p>Maximum chemical consumption</p>	<p>EEB/BEUC suggest using a combination of x g/m2 cleaned surface together with a requirement that all personnel have dosing devices.</p> <p>The setting of a maximum consumption should be limited to the maintenance cleaning. The suggested value of 640 µl/m2, when calculated per cleaning, is justifiable.</p>	<p>Comments partially accepted: The approach proposed in the comments is the one used by Nordic Swan, which only covers Nordic countries and is based on the use of soft water. Due to the fact that the EU Ecolabel should cover as many practices as possible throughout the whole of EU28, it is not proposed at this point to impose a maximum threshold for chemical use.</p>
<p>Criterion 7 - Cleaning product dosage</p> <p>Dosing systems</p>	<p>We support strongly a requirement on dosage systems. Automatic or manual dosage system must be available for stuff. There should also be a requirement on procedures how (and that) they are used.</p> <p>Availability of clear dosage labels and dosage tools could add the staff in using the right dosing.</p> <p>Automatic dosing systems that can't be bypassed by the staff also exists but cannot be mandatory. Since I doubt they can always be installed in their clients' premises.</p> <p>The demand regarding the application of a dosing system basically not wrong. However, choosing the right system mainly depends on the object size and object relations.</p> <p>On the other hand, we think that could be an optional criterion about automatic dosing or one-dose use products.</p> <p>The producers already sell the appropriate dilution of chemical concentrates, limiting the exposure of workers with embedded feeders. We agree on the use of concentrated products and always where facility allows the installation of dispensing devices.</p>	<p>Comments accepted: The proposed criterion text (see Section 3.1.2) asks for appropriate dosing apparatus to be available to staff, along with appropriate instructions. The wording does not state what kind of apparatus is required as automatic dosing systems are only appropriate when large surfaces should be cleaned and stakeholder consultation yielded that other apparatus used include pumps, beakers, etc.</p>

<p>Criterion 7 - Cleaning product dosage</p> <p>Staff training</p>	<p>This is a very important issue and we believe staff training is key.</p>	<p>Comments accepted: Criterion M5: Staff training is proposed to cover the issue of correct dosing.</p>
	<p>More emphasis should be placed on the adequacy of staff training to ensure overdosing does not occur.</p>	
	<p>It would be important to include cleaning product dosage in the workers training.</p>	
<p>Criterion 7 - Cleaning product dosage</p> <p>Bundling of dosing equipment</p>	<p>Do the 2.400 eco-labelled products mentioned before have dosage systems? Or does this criterion require reducing the market for cleaning products furthermore?</p>	<p>Comment accepted: The proposed wording for the criterion does not require that the products used come with dosing equipment but rather that appropriate dosing equipment is made available by the cleaning company to staff and it can be acquired separately from the cleaning products.</p>
<p>Criterion 8 from the 1st Technical Report has been separated into two: Criterion 08: Efficiency of laundry washing machines owned by the applicant and Criterion 09: Outsourced auxiliary services and products</p> <p>(see Sections 3.2.8 and 3.2.9 for rationale)</p>		
<p>Criterion 8 - Efficiency in activities related with cleaning services (laundry services)</p> <p>Scope and definition</p>	<p>BEUC and EEB welcome this criterion.</p> <p>However, the scope of the criterion is not very clear and we are wondering if the washing of cloths and mops is included.</p>	<p>Comments accepted: The washing of all accessories and uniforms used in the delivery of the cleaning services are covered by this criterion. It is proposed to offer a list with examples of what could potentially be laundered in the User Manual.</p>
	<p>Sub-criterion 8c test " for laundry services". Are laundry services part of the scope? This becomes confusing. I suppose these machines are used to wash mops and optionally staff uniforms.</p>	
	<p>This criterion applies primarily to subcontracted laundry services or by activities used with the own customer equipment. We believe that it should not be considered as a general criterion.</p>	
<p>Criterion 8 - Efficiency in activities related with cleaning services (laundry)</p>	<p>Laundry services are not used within cleaning services. They are either performed by the own customer equipment or are subcontracted to specialized companies. This criterion has furthermore nothing to do with the contract matter and is therefore not applicable.</p>	<p>Comments partially accepted: For GPP, this criterion is not included. For the EU Ecolabel, the criteria do have to be directly related with the subject matter and here the laundering of accessories does help ensure that the cleaning services delivered are of</p>

services) Scope	The laundering of uniforms etc. is not often part of a cleaning services specification. We suggest that this Criterion is therefore not relevant to the subject matter - it is outside the scope of this project.	high quality and are part of the environmental hotspots that are associated with cleaning services.
Criterion 8 - Efficiency in activities related with cleaning services (laundry services) Professional machines	Sub-criterion 8b: What if they buy a professional machine? No requirements apply? This could be in favour of the large companies. As regards 8c. the energy classes referred to relate to 'Domestic' washing machines and not industrial washing machines. In most cases, third party laundry services will use the latter.	Comments accepted: the proposed criterion (Criterion 08: Efficiency of laundry washing machines owned by the applicant) only refers to the machines owned by the company and not those of the external cleaning service. For professional machines, no energy labelling exists as of right now (see Section 3.2.8) due to the fact that they vary greatly based on their intended use.
Criterion 8 - Efficiency in activities related with cleaning services (laundry services) Energy labelling	We believe it is relevant to refer to energy labelling for domestic vacuum cleaners and washing machines and we recommend including a mention of energy efficiency in this criterion.	Comment accepted: Energy labelling is proposed to be part of the requirement for Criterion 08: Efficiency of laundry washing machines owned by the applicant.
Criterion 8 - Efficiency in activities related with cleaning services (laundry services) Availability of laundry services	This could be a point's requirement. In Sweden the cleaning companies wash at the facility or they have a washing machine at the "headquarters" or send to external laundry services but we heard at the working group meeting that cleaning companies in Spain never wash self but send the textile to external laundry services Please note that there is no ecolabel in France for laundry services, and no laundry services are certified according to Nordic Swan in France. Number of laundry services certified according to ISO 14001, or EMAS: a rough estimation of the number of ISO 14001 certificates delivered in France is less than 100. Criterion 8: Efficiency in activities related with cleaning services (laundry services) We propose to delete this criterion or make it optional. Sub-criterion 8A. There is not ISO Type I ecolabelled laundry services in Catalonia. Sub-criterion 8a: I have serious doubts this is available in Belgium	Comments accepted: This criterion (Criterion 09: Outsourced auxiliary services and products) is proposed to be part of the point system and only applicable if the applicant makes use of such external services.
Criterion 8 - Efficiency in activities related with	If laundry machines can be part of a criterion, then using EU Ecolabel laundry detergent should be part of a criterion as well.	Comments accepted: Laundry detergents are part of the scope of Criterion 09: Outsourced auxiliary services and products. Concerning I&I products, these are

<p>cleaning services (laundry services)</p> <p>Laundry detergents</p>	<p>Regarding the Ecolabel for professional detergents we would like to emphasize that there are 'hygiene' detergents, which are used very often in professional laundry equipment, excluded from Ecolabel scheme because the criteria for this category are so stringent that currently cannot be met for that type of product.</p>	<p>meant to be used in highly professional machines, which are not normally the ones used by cleaning companies (but by the external laundry service providers).</p>
<p>Criterion 8 - Efficiency in activities related with cleaning services (laundry services)</p> <p>Energy use</p>	<p>Is the impact of the energy-consumption relevant enough to set a criterion?</p>	<p>Comment acknowledged: Yes, LCAs for laundry washing show that energy use is an environmental hotspot. As multiple accessories used in cleaning services need to be laundered in order to function properly (cloths, mops, uniforms, as applicable), it is then a hotspot for cleaning services.</p>
<p>Criterion 9 from the 1st Technical Report has been removed and the contents incorporated in Criterion M5: Staff training (see Section 3.1.2 for rationale)</p>		
<p>Criterion 9 - Room temperature water in cleaning product dilution</p> <p>Already part of normal practices</p>	<p>This criterion seems reasonable.</p>	<p>Comments accepted: As the use of cold water is already part of normal practices and it is not easily verifiable, it is proposed not have a special criterion for this requirement.</p>
	<p>In Sweden cold water is normally used in cleaning product dilution by the staff</p>	
	<p>This criterion is not applicable, as only cold or room temperature water is used for cleaning product dilution.</p>	
	<p>The demand for the use of cold or room temperature water is recommended by all manufacturers in the area of industrial surface cleaning.</p>	
	<p>Criterion 9: Room temperature water in cleaning product dilution We agree on this criterion. The recommended dosage of the cleaning products that manufacturers is based on room temperature water.</p>	
<p>Criterion 9 - Room temperature water in cleaning product dilution</p> <p>Part of training</p>	<p>This requirement shall rather be integrated into the criterion dealing with training</p>	<p>Comments accepted: Criterion M5: Staff training is proposed to contain the requirement for staff to be trained to use cold water (or the water temperature recommended by the product manufacturer) when diluting products.</p>
	<p>This could be part of the staff training</p>	
	<p>This could be part of the training the staff has to follow</p>	

	We understand that this criterion should not be applicable, both for its inability to monitoring as by a low significance in terms of environmental impact. However, the use of a suitable room for dilution of the cleaning products could help properly. We believe that it should be a part of the training plans that cleaning companies must provide to their employees.	
Criterion 10 from the 1st Technical Report has been renamed Criterion O3: Energy efficiency for vacuum cleaners (see Section 3.2.3 for rationale)		
Criterion 10 - Energy efficiency for vacuum cleaners	We welcome this criterion. We think that the time line depends on how often new machinery is bought. The criterion could be set for all new machines bought.	Comments accepted: As the requirements in the new proposed criterion are much less stringent, it is proposed that they apply to vacuum cleaners that are already owned by the company and are used in the provision of the cleaning services.
	This is a post application criterion i.e. we are not asking for existing cleaners to be energy efficient but rather those that are purchased in the future. What happens if the applicant doesn't - do we withdraw their licence?	
Criterion 10 - Energy efficiency for vacuum cleaners	[Anthesis note] Comment provided as direct amendment of original report text. Please refer to the relevant document	Comment acknowledged.
Criterion 10 - Energy efficiency for vacuum cleaners Scope	Domestic Vacuum cleaners are being referred to here - why? In most situations industrial cleaners are likely to be used.	Comment accepted: The vacuums now covered by this criterion are proposed to be those that fall under the energy labelling directive and therefore can be both domestic and commercial.
Criterion 10 - Energy efficiency for vacuum cleaners Thresholds	There are currently no industrial machines that meet these levels of consumption. Machines with less than 16 kW/h are more for domestic use rather than a professional use. Likewise class A+ vacuum cleaners just affect for domestic use. We propose to delete this criterion.	Comment partially accepted: The new proposed wording for the criterion no longer makes reference to kW/h thresholds but rather to energy classes. As machinery energy use has been highlighted as an environmental impact for cleaning services and the energy label exists, it is not proposed to remove this criterion.
Criterion 10 - Energy efficiency for vacuum cleaners Dust pick-up	We also must take into account the effectiveness of the vacuum cleaner e.g. in terms of dirt pick up.	Comment partially accepted: While dust pick-up is important, due to the fact that the dust pick-up efficiency on the energy label is based on a calculation that is most relevant for domestic vacuum cleaners, it is not proposed to be considered in this criterion.

<p>Criterion 10 - Energy efficiency for vacuum cleaners</p> <p>Remark</p>	<p>Criterion 10: Energy efficiency for vacuum cleaners</p> <p>No comments on it.</p>	<p>Comment acknowledged.</p>
<p>Criterion 10 - Energy efficiency for vacuum cleaners</p> <p>Environmental impact</p>	<p>Is this a relevant environmental impact?</p> <p>Is this a relevant environmental impact? Important enough to set a criterion?</p>	<p>Comment acknowledged: Yes, energy use from machinery has been highlighted in LCAs related to cleaning services (see introduction to Section 3.2.3 for references).</p>
<p>Criterion 11 from the 1st Technical Report has been removed</p> <p>(see Section 1.3 for rationale)</p>		
<p>Criterion 11 - Staff uniforms</p> <p>Dry cleaning</p>	<p>Furthermore, uniforms should not require dry cleaning as this cleaning process uses much more hazardous chemicals and is much less environmental friendly.</p>	<p>Comment accepted: It is propose that if external cleaning services are used, at least a portion should be ecolabelled (and therefore cannot be dry cleaning). A specific requirement for the non-use of dry cleaning is not proposed though as not to increase the number of criteria.</p>
<p>Criterion 11 - Staff uniforms</p> <p>Point criterion</p>	<p>Could be a points requirement</p> <p>This criterion would only increase costs for cleaning companies as either they already have uniforms purchased or do not provide uniforms to their staff. In any case this criterion has nothing to do with the contract matter and is therefore not applicable.</p> <p>We fully support setting a requirement on using staff uniforms that have low environmental impact. However we think that it would be possible for companies to allow their staff to wear their own cloth, without excluding them from the EU Ecolabel application. We believe that it is worth mentioning it specifically in the criterion</p> <p>This should be an optional criterion. How relevant is the impact of staff clothing within the sum of all the activities of the cleaning company? If the impact is irrelevant, I'm not in favour of such a criterion. Does it cover textiles as well as footwear?</p>	<p>Comments accepted: During the revision work, it was considered to make this criterion part of the point system in order to offer more flexibility to applicants but currently the availability of ecolabelled uniforms is still very low throughout EU28 and thus it is proposed to remove this criterion.</p>

<p>Criterion 11 - Staff uniforms</p> <p>Availability</p>	<p>On French market, the offer for EU Ecolabelled staff uniforms is close to 0</p>	<p>Comments accepted: Research on market availability and stakeholder consultation has indeed yielded that the availability of ecolabelled uniforms is still very low on the EU28 market.</p>
	<p>In the UK we have few, if any, Ecolabelled uniforms available on the market.</p>	
	<p>We think that nowadays there is not market. We propose to delete this criterion or make it voluntary.</p>	
	<p>While this is an interesting approach in the future, there is currently no market for this product which would affect the competitiveness of cleaning companies. We believe that it should not be considered as a general criterion.</p>	
<p>Criterion 11 - Staff uniforms</p> <p>Other verification labels</p>	<p>It is suggested to include specialized labels which focus only on some of the criteria of the Ecolabel scheme on textiles, i.e. limited use of substances harmful to environment (Oekotex-Label); use of natural or environmental friendly raw materials (naturtextil IVN certified BEST).</p>	<p>Comment accepted: Such an approach can be studied in more detail in a future revision if the market availability of ecolabelled uniforms increases.</p>
<p>Criterion 12 from the 1st Technical Report has been renamed Criterion 07: Vehicle fleet owned or leased by the applicant</p> <p>(see Section 3.2.7 for rationale)</p>		
<p>Criterion 12 - Air emissions and fuel use associated with road transport</p> <p>Scope</p>	<p>BEUC and EEB support this criterion as road transport has a high potential of environmental damage.</p> <p>However, in our view, ordinary cars should be included in the scope as well as many cleaning services have their equipment at their customers' place. Therefore, the personnel do not need big cars.</p>	<p>Comments accepted: The criterion wording has been updated in order to be more specific about the cars in scope (see Section 3.2.7).</p>
	<p>Sub-criterion 12c: This criterion is very unclear so it's very difficult to comment on this.</p>	
<p>Criterion 12 - Air emissions and fuel use associated with road transport</p>	<p>However, we call the JRC to further investigate and provide us with a more thorough background report concerning the impact of transport. There can be different hurdles set for different types of cars, but as a minimum 120 g CO2/ km should be met for all vehicles. We however don't see the possibility to require that the private cars of the personnel should meet the criteria.</p>	<p>'Comment XXX: Evidence shows that XXXXXX (Ok to further research as pointed out By BFF)(Section 3.2.7)</p>

<p>Criterion 12 - Air emissions and fuel use associated with road transport</p> <p>Scope/applicant scope</p>	<p>If the Ecolabel is planned to be given for the entire company, how will it be possible to differentiate between the activities inside and outside the scope when checking the compliance with these criteria / thresholds. Regarding sub-criterion 12A and as already explained in our general comments: the same driver uses a vehicle to visit a customer of an eco-labelled cleaning service and another customer whose services are not under the scope of the Ecolabel (for example non eco-labelled cleaning services or other facilities management services). As already stated, you cannot differentiate between all the services a Facilities Management company performs. As a consequence, the whole car fleet of a company is concerned although only a part of the road transport is carried out for eco-labelled services. All sub-criteria will however lead to massive cost increases for cleaning companies.</p>	<p>Comment partially accepted: A text specifying that the EU Ecolabel should be awarded on a service-line basis has been added in Section 2.2. Moreover this criterion is proposed to be part of the point system so that if a company deems the linked costs too high, they can choose not fulfil the requirements.</p>
<p>Criterion 12 - Air emissions and fuel use associated with road transport</p> <p>Verification</p>	<p>Again, a post application criterion is being proposed as per vacuum cleaners. This can't be verified on application, there is therefore a real risk to the EU Ecolabel. What happens if the licence holder does not purchase one in the future - how will we know?</p>	<p>Comments accepted: The wording has been changed to reflect that the criterion concerns the vehicles owned at the time of the application.</p>
<p>Criterion 12 - Air emissions and fuel use associated with road transport</p> <p>Point system</p>	<p>We propose to make this criterion optional. Transport is an indirect aspect in cleaning services, it is not as important as in distributing services. Furthermore, we think that could be difficult to monitoring and verify.</p>	<p>Comments accepted: The criterion has been changed and is now part of the point system. The verification and assessment have also been updated to be more specific as to what documents can be used to demonstrate compliance.</p>
<p>Criterion 12 - Air emissions and fuel use associated with road transport</p> <p>Transport plan</p>	<p>When a company has a company transport plan, this should be rewarded. This is for example mandatory in a city like Brussels for all companies and organisations with more than 100 employees. This is an example (http://www.bruxellesmobilite.irisnet.be/partners/entreprises/plan-de-deplacement-des-entreprises)</p>	<p>Comment accepted: The criterion now includes a third part that concerns the maintenance of the fleet and a transport plan, as it is a relatively low-cost and effective manner to promote environmental behaviour.</p>
<p>Criterion 12 - Air emissions and fuel use associated with road transport</p> <p>Remark</p>	<p>We have good experience from the Nordic swan criterion on transportation. Would support a copy of their requirement</p>	<p>Comment accepted.</p>
<p>Criterion 12 - Air emissions and fuel use associated with</p>	<p>Sub-criterion 12a: All new purchased vehicles will apply anyway, this is mandatory</p>	<p>Comments accepted: The wording of the criterion has been updated to cover the cars already owned or leased by the company, as indeed the thresholds that were proposed</p>

<p>road transport</p> <p>Non-criterion</p>	<p>Sub-criterion 12b: The requirements is not very ambitious, this is just the average a car constructor has to sell</p> <p>To spend less energy and reduce pollution, eco-mobility should be encouraged (sharing of cars, mix of transportation modes, using the numeric to organize ...).</p> <p>The thresholds for carbon emissions are not ambitious. Please see the car labelling made by ADEME:</p> <p>http://carlabelling.ademe.fr/index/</p>	<p>should already be met by all new cars put on the market.</p>
<p>Criterion 12 - Air emissions and fuel use associated with road transport</p> <p>Cost increase</p>	<p>This approach is feasible and its achievement results in a direct environmental benefit although the sub-criterion 12C will presume a cost increase - between 20% and 100%- which should be taken into account when contracting with public administrations.</p>	<p>Comment accepted: The criterion is proposed to be part of the point system and thus, if the costs linked to the criterion are too high, then the company can focus on other aspects and does not have to fulfil the requirements.</p>
<p>Criterion 13 from the 1st Technical Report has been renamed Criterion M5: Staff training (see Section 3.1.5 for rationale)</p>		
<p>Criterion 13 - Staff training</p> <p>Scope</p>	<p>BEUC and EEB fully support this essential criterion although it remains a bit vague. This is why we call for clarifications on the following areas:</p> <ul style="list-style-type: none"> - verification of the training (quality assessment) - selection of the staff concerned - frequency of the training - organization of the training (monitor, number of staff trained at the same time, arrangements available). <p>The criterion needs to be clearer and more precise. For example how frequent should the training be? what intervals should there be before refresher training? Is it all staff or only a proportion?</p> <p>This criterion is very important. It should be very clear who should follow a training (all staff? only supervisors? also temporary staff?) and how often (yearly, 2-yearly,). Should a supervisor within the company verify that what has been taught is being implemented? This has to be very clear so it can be checked by the CB's</p>	<p>Comments accepted: The criterion wording has been updated to indicate that cleaning staff and overseeing managers should follow the training and an update has been made to indicate how often the training should take place and when it should be followed up.</p> <p>The assessment and verification procedures have also been updated to indicate what documentation should be provided to demonstrate that adequate training has taken place.</p>

	The staff training is very important and fundamental to achieve a proper cleaning service, the certification ISO 90001 for cleaning staff could be helpful to set and improve along time the cleaning service (continue improvement).	
Criterion 13 - Staff training Scope/applicant scope	In case the Ecolabel is awarded to the entire company, this criterion implies in practice that all employees have to be trained, also those that will never work on a site/contract of an eco-labelled service. This will lead to a massive increase of costs. The company has to therefore cope with a lot of additional costs that only a small amount of his customers will be willing to pay for (if ever).	Comments accepted: A text specifying that the EU Ecolabel should be awarded on a service-line basis has been added in Section 2.2. Moreover, the criterion wording has been updated to indicate that cleaning staff and overseeing managers should follow the training.
Criterion 13 - Staff training Nation training standards	Finally, the JRC proposal mentions that "Staff training should comply with national training standards for cleaning staff". However, the JRC has to make sure whether it exists in all countries. In France, Vocational qualification certificate (certificat de qualification professionnelle CQP) in the cleaning activities sector do exist.	Comments accepted: The assessment and verification procedures have been updated to indicate what kind of documentation should be provided to demonstrate that adequate training has taken place. This is applicable in all countries and a mention is made for countries where national training schemes are available.
Criterion 13 - Staff training Topics to be covered	If "Health & Safety" has to be considered, other aspects shall not be forgotten, such as: - Road traffic injury prevention. - Prevention of work-related muscular-skeletal disorders (employee training in working gestures and posture and the ergonomics of workstations). Ergonomics could be part of the "health and safety" Furthermore, we would like to highlight that the training has to include how to read the material safety data sheets for the detergents and other chemicals used, especially the parts which are important for the user. Source segregation of waste and appropriate segregation of hazardous waste or waste with hygiene risks should be included in the training. (...) We ask for more details on an appropriate waste management. We believe that this criterion should be included as well in the staff training criterion (criterion 13) (...) the use of microfibers.	Comments accepted: The list of topics that should be covered has been updated.

	Staff training concerning this issue could be an added value.	
	(...) Waste water discharge This requirement shall rather be integrated into the criterion dealing with training.	
	(...) Waste water discharge We think that it would be enough include it into the personal training.	
	(...) See remark above regarding durability versus hygiene considerations which should be included in the staff training.	
Criterion 13 - Staff training Remark	This is an important criterion we support it strongly	Comments accepted.
	Criterion 13: Staff training We agree with this criterion.	
Criterion 13 - Staff training	This criterion is considered essential both as a requirement for a given accreditation as an essential tool for achieving the strategic goals of companies. Moreover, the content could eliminate those aspects that are not at the discretion of the operator. For example, training to choose durable and reusable accessories could not be necessary if the only accessories available in the market fulfilled these characteristics.	Comments accepted: The topics indicated in the criterion are broad enough that a cleaning service provider can adjust them to fit their needs.
Criterion 14 from the 1st Technical Report has been split in two: Criterion M7: Environmental management measures and practices and Criterion O4: EMAS registration, ISO 14001 certification of the service provider (new criterion) (see Sections 3.1.7 and 3.2.4 for rationale)		
Criterion 14 - Environmental measures and practices	See comments on criterion 8 (Number of laundry services certified according to ISO 14001, or EMAS: a rough estimation of the number of ISO 14001 certificates delivered in France is less than 100.)	Comment rejected: Comments left on Criterion 8 did not concern cleaning service providers.
Criterion 14 - Environmental measures and practices SMEs	This criterion is difficult for small companies to fulfil. The Ecolabelling offers this already.	Comments accepted: It is proposed that no requirements of an EMAS registration or ISO 14001 certification are made in the mandatory criteria in order not to exclude small companies.
	This could be very difficult for small companies with limited resources	

<p>Criterion 14 - Environmental measures and practices</p> <p>Redundant/cost increase</p>	<p>Does this Criterion add any value? The environmental measures that might be managed by an EMAS or ISO 14001 certified system would be those already specified by other criteria.</p> <p>This criterion is redundant and furthermore not feasible and unacceptable, as this would impose an immense additional requirement, which again massively increases the costs.</p>	<p>Comments accepted: The requirements in Criterion M7: Environmental management measures and practices aim to ensure that an environmental management system is, indeed, in place, without necessitating a third party certification that might increase costs.</p>
<p>Criterion 14 - Environmental measures and practices</p> <p>Remark</p>	<p>Criterion 14: Environmental management measures and practices</p> <p>We agree with this criterion.</p>	<p>Comments accepted.</p>
<p>Criterion 15 from the 1st Technical Report has been removed and is now partially part of Criterion M5: Staff training</p> <p>(see Section 1.3 for rationale)</p>		
<p>Criterion 15 - Waste water discharge</p> <p>Training</p>	<p>Difficult to deal this requirement with since it is under the responsibility of the customer.</p> <p>This requirement shall rather be integrated into the criterion dealing with training.</p> <p>Criterion 15: Waste water discharge</p> <p>We think that it would be enough include it into the personal training.</p>	<p>Comments accepted: It is proposed that correct waste water discharge becomes a topic to be covered in Criterion M5: Staff training.</p>
<p>Criterion 15 - Waste water discharge</p> <p>Remark</p>	<p>This criterion is not needed</p>	<p>Comment accepted.</p>
<p>Criterion 15 - Waste water discharge</p> <p>Largely up to the client/available facilities</p>	<p>First of all, the regulations for wastewater discharge differ in the 28 EU-Member States. Secondly, compliance with this criterion depends on how the customer foresees it at his own premises. The cleaning company cannot be held responsible for this, as the cleaning staff do not have any influence on the premises themselves. The criterion is therefore not applicable.</p> <p>We agree with this criterion but we considered it as a criterion to require to the public administration rather than the cleaning company. In any case this subject will be managed as established in the environmental management system (EMAS or ISO 14001).</p>	<p>Comments accepted: As stated in the comments, where the waste water should be discarded largely depends on the client but it is nevertheless important that staff always know what is the appropriate way of discarding that waste water given the site they are working on. Thus, it is proposed that correct waste water discharge becomes a topic to be covered in Criterion M5: Staff training.</p>

	BEUC and EEB fully support the approach proposed by the JRC on this issue. However, this criterion needs to be more elaborated to tackle pending issues.	
Criterion 16 from the 1st Technical Report has been split into two: Criterion M8: Solid waste sorting and disposal at the applicant's premises and Criterion O5: Solid waste sorting and disposal at the cleaning sites (see Sections 3.1.8 and 3.2.5 for rationale)		
<p>Criterion 16 - Solid waste collection and sorting</p> <p>Largely depends on client</p>	<p>We support this criterion despite some parts of it may not be easily controlled by the cleaning service provider. We ask for more details on an appropriate waste management.</p> <p>We believe that this criterion should be included as well in the staff training criterion (criterion 13)</p>	<p>Comments accepted: In order to reflect the fact that a cleaning service company does not control the waste separation on the cleaning sites, it is proposed to make a distinction between waste sorting and disposal at the cleaning service company premises and at their clients'.</p> <p>Only the sorting at the cleaning service company's premises is proposed to be made mandatory as they have full control.</p> <p>At the cleaning sites, the sorting of waste and proper disposal is part of the point system and only concerns the sites where the client provides the means to sort waste into multiple streams.</p> <p>Moreover, proper waste sorting and disposal is one of the topics that is proposed to be covered in Criterion M5: Staff training.</p>
	<p>Same comments as for Criterion 16 (note from JRC-IPTS: it is believed that the commentator was referring to the comments they left on Criterion 15: "Difficult to deal this requirement with since it is under the responsibility of the customer. This requirement shall rather be integrated into the criterion dealing with training.")</p>	
	<p>Here again, it depends on how the customer foresees it at his own premises. The cleaning company cannot be held responsible for this, as the cleaning staff do not have any influence on the premises themselves. The criterion is therefore not applicable.</p>	
	<p>Criterion 16: Solid waste collection and sorting</p> <p>We think that it would be enough to include it into the workers training.</p>	
	<p>We agree with this criterion. This subject will be managed as established in the environmental management system of the public administration.</p>	
Criterion 17 from the 1st Technical Report has been renamed Criterion M6: Wage policy (see Section 3.1.6 for rationale)		
<p>Criterion 17 - Wage policy</p> <p>Many national wage regulations</p>	<p>Although BEUC and EEB support a minimum salary for cleaning services employees, we recognize that the heterogeneity of national minimum wage regulations in Europe can hinder the implementation of this criterion</p>	<p>Comments accepted: The proposed criterion wording has been changed to refer to sector wages and, if sector wages do not exist, national or local minimum wages.</p>
	<p>Actually, in 22 of the 28 EU-Member States national minimum wages exist. Furthermore, in all EU-Member States, except the UK and most Eastern European countries, national minimum sector wages through collective agreements exist. These are higher than the</p>	

	national minimum wage and have to be respected by all companies irrespective of their origin, except in Scandinavian countries. This overview already demonstrates the complexity of the situation.	
Criterion 17 - Wage policy Countries without national regulations	In Sweden we don't have any minimum wage regulation so this criterion does not work in Sweden. We strongly support this kind of criterion. However, Sweden does not have minimum wages so the wording must be changed. We are investigating how this could be worded so that the requirement will be relevant also in Sweden. We'll come back with a proposal.	Comment acknowledged: The proposed criterion is to be discussed for countries like Sweden in the 2 nd AHWG meeting.
Criterion 17 - Wage policy Verification	The control of compliance with these sectoral wages is a public task, which public authorities (police, customs, and labour inspections) can only carry out randomly. The cleaning sector in Europe accounts for about 3.32 million employees. With a view to this high number, a criterion that aims to control the respect of these wages would lead to an unbelievable bureaucratic effort, which would not at all be feasible in practice. This is an important criterion, but how to check? Do Competent Bodies and/or auditors have the authority to check the payslips ((data protection) We totally agree with this criterion, as assessment we suggest to consider standard SA 8000 certification or guideline UNI EN ISO 26000. (Already mentioned in the Textile products Ecolabel dated June the 5th 2014- criterion 26 - fundamental elements of cleaning service) .It is very important also to check the suppliers, as many company don't check the origin and the ethical standard of their suppliers. In addition, there are strong objections against this criterion with a view to data protection. A certifying body, may it be a private or semi-public company, has no right or authorisation to check the payslips of each concerned employee. This would go against all data protection laws. Payslips, while being different in each country, contain sensitive information (date of birth, marital status, number of children, etc.) that is only designated for the employee in question. By no way, an employee would agree that this sensitive information is given to someone else that a public authority. While we strongly support compliance with national minimum sector wages, we do not see how this compliance can be controlled in practice.	Comments accepted: The assessment and verification proposed in the updated criterion no longer refers to payslips or any other proof of compliance that might go against data protection. It is proposed to have a third party certification for the social aspects considered (minimum wage).

<p>Criterion 17 - Wage policy</p> <p>Social vs environmental criteria</p>	<p>This is a social and not an environmental criterion and has therefore nothing to do in an EU Ecolabel. Furthermore, it has nothing to do with the contract matter and is therefore not applicable.</p>	<p>Comments rejected: Article 6(e) of the EU Ecolabel Regulation allows the EU Ecolabel scheme to cover social aspects if they are important to the product group. In the case of cleaning services, the payment of decent wages is often cited as an important social issue.</p>
	<p>Criterion 17: Wage policy We propose to delete this criterion. Ecolabel should be focused on environmental issues. On the other hand it is difficult to monitoring and verifies this criterion.</p>	
	<p>We disagree with this approach since the current European Ecolabel Regulation does not regulate social criteria. We propose to delete this criterion.</p>	
<p>Criterion 18 from the 1st Technical Report has been removed (see Section 1.3 for rationale)</p>		
<p>Criterion 18 - Labour standards</p> <p>Remark</p>	<p>BEUC and EEB fully support this criterion.</p>	<p>Comment accepted.</p>
<p>Criterion 18 - Labour standards</p> <p>Remark</p>	<p>["shall be observed by all cleaning service providers."] This is repetition and can be deleted</p>	<p>Comment accepted.</p>
<p>Criterion 18 - Labour standards</p> <p>Not relevant/ Alternatives</p>	<p>This criterion is more or less copied and pasted from Textile Products. This is justified for textile products since the manufacture of such products can be done outside EU, but is less justified for cleaning services operating in EU.</p> <p>Rather than this criterion, it could be better to envisage an optional requirement concerning good practises such as:</p> <ul style="list-style-type: none"> - Integration of disabled workers - Integration of people remote from the labour market - integration of women at supervisory level, ... 	<p>Comments accepted: While aspects as the integration of disabled workers and the payment of taxes are important, it is proposed that only the most important social aspect is considered – decent wages, and thus the proposed that no other criteria on social aspects are added.</p>
	<p>The actors in this branch are local and therefore we would like to have a criterion on that the cleaning company has paid taxes and social fees instead.</p>	
	<p>While ILO standards may be relevant for the production of textiles, as they are mostly</p>	

	done out of Europe, these standards are not at all relevant for cleaning services, as they are provided inside Europe.	
Criterion 18 - Labour standards For GPP	Does not work for GPP. It's not linked to the subject matter. You have to rephrase. I can provide text after the meeting.	Comment accepted.
Criterion 18 - Labour standards	<p>Criterion 18: Labour standard We propose to delete this criterion. Ecolabel should be focused on environmental issues. On the other hand it is difficult to monitoring and verifies this criterion.</p> <p>This is a social and not an environmental criterion and has therefore nothing to do in an EU Ecolabel. Furthermore, it has nothing to do with the contract matter and is therefore not applicable.</p> <p>We disagree with this approach since the current European Ecolabel Regulation does not regulate social criteria. We propose to delete this criterion.</p>	Comments partially rejected: Article 6(e) of the EU Ecolabel Regulation allows the EU Ecolabel scheme to cover social aspects if they are important to the product group. In the case of cleaning services, it is proposed that only the most important social aspect is considered – decent wages, and thus the proposed criterion on labour standards is proposed to be removed.

Annex B: Methodology to score points to the whole set of optional criterion (including “additional aspects”)

Table B.1. Methodology used to score points to optional criteria

Optional criteria	Environmental improvement ^{a)}	weight 50%	Technical feasibility ^{b)}	weight 20%	Economic feasibility ^{c)}	weight 30%	Calculations ^{d)}	Score points to criterion
Criterion 01: Use of concentrated undiluted cleaning products	2	0.5	3	0.2	3	0.3	2.5	3
Criterion 02: Use of cleaning supplies and accessories with lower environmental impact								
02 (a) Mops	1	0.5	2	0.2	3	0.3	1.8	2
02 (b) Cloths	1	0.5	2	0.2	3	0.3	1.8	2
Criterion 03: Energy efficiency for vacuum cleaners ^{e)}	2	0.5	3	0.2	2	0.3	2.2	2
Criterion 04: EMAS registration, ISO 14001 certification of the service provider								
04 (a) EMAS	3	0.5	1	0.2	1	0.3	2	2
04 (b) ISO 14001	2	0.5	1	0.2	1	0.3	1.5	2
04 (c) EMAS and ISO 14001	3	0.5	1	0.2	1	0.3	2	2
Criterion 05: Solid waste sorting and disposal at the cleaning sites	2	0.5	3	0.2	3	0.3	2.5	3
Criterion 06: Quality management (new criterion)	2	0.5	1	0.2	1	0.3	1.5	2
Maximum number of points that can be obtained								16 ^{e)}

a) 1 (low improvement) - 3 (high improvement)

b) 1 (difficult to implement) or 3 (easy to implement)

c) 1 (high investment/cost) or 3 (low investment/cost)

d) Final sum of values obtained by multiplying each aspect (environmental improvement, technical feasibility and economic feasibility) by the each corresponding weight

e) Applicant can only score a maximum of 2 points in criteria 04.

Table B.2. Distribution of points to optional criteria (additional services)

Services	Maximum number of points that can be obtained	-- Points allocation --
Cleaning service provision	16 points	---
Additional services:		
Criterion O7: Vehicle fleet	3 additional points	
<i>07 (a) Vehicles meet Euronorm Euro 5</i>		<i>0.1 points per vehicle (maximum 1 point)</i>
<i>07 (b) Vehicles meet Euronorm Euro 6</i>		<i>0.2 points per vehicle (maximum 1 point)</i>
<i>07 (c) Company transport plan</i>		1 point
Criterion O8: Laundry machines a)	2 additional points	
<i>08 (a): At least 50% in-house household washing machines (class A***)</i>		2 point
<i>08 (b): At least 90% in-house household washing machines (class A**)</i>		2 point
Criterion O9: Outsourced auxiliary services and products	2 additional points	1 point per service 0.5 points per product
		<i>Note: points can be awarded to two services or four products or any combination thereof up to 2 points</i>

a) Criterion O8(a) and O8(b) are mutually exclusive. In case of applicability the applicant can only fulfil one or other criterion, not both.

Annex C: Points to the optional criterion set

Criteria for awarding the EU Ecolabel to the *Indoor Cleaning Services* product group:

	Optional Criteria	Maximum points achievable
	Criterion 01: Use of concentrated undiluted cleaning products	3
	Criterion 02: Use of cleaning supplies and accessories with lower environmental impact	
	02 (a) At least 50% of mops	2
	02 (b) At least 50% of cloths	2
	Criterion 03: Energy efficiency for vacuum cleaners	0.2 points per vacuum <i>(maximum 2 points)</i>
	Criterion 04: EMAS registration, ISO 14001 certification of the service provider	
	04 (a) EMAS Registration	2
	04 (b) Certification ISO 14001	2
	04 (c) EMAS registration + Certification ISO 14001	2
	Criterion 05: Solid waste sorting and disposal at the cleaning sites	3
	Criterion 06: Quality management	2
Optional criteria (additional aspects)	Criterion 07: Vehicle fleet owned or leased by the applicant	
	07 (a) Vehicles meeting European emission standard Euro 5	0.1 points per vehicle <i>(maximum 1 point)</i>
	07 (b) Vehicles meeting European emission standard Euro 6	0.2 points per vehicle <i>(maximum 1 point)</i>
	07 (c) The provider has a company transport plan and maintenance records for the fleet of vehicles	1
	Criterion 08: Efficiency of laundry washing machines owned by the applicant	
	08 (a) At least 50% in-house household washing machines (class A***)	2
	08 (b) At least 90% in-house household washing machines (class A**)	2
	Criterion 09: Outsourced auxiliary services and products	1 point per service 0.5 points per product <i>(maximum 2 points)</i>

Annex D: Energy label for several models of commercial vacuum cleaners rated C or lower

Table D.1. Characteristics of the energy label for several models of commercial vacuum cleaners (Kärcher, 2015) and (Nilfisk, 2015)

	KÄRCHER	NILFISK	NILFISK	NILFISK	NILFISK	NILFISK	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	KÄRCHER	NILFISK	NILFISK	NILFISK	NILFISK	NILFISK	NILFISK	NILFISK	NILFISK					
Model	T15/1 ESB 34	GD 10	GD 5	GD 5 HEP A	GU 355 -2	GU 455 -2	T15/1 HEP A ESB 2B	T12/1	T12/1 Parke tt	T15/1 HEP A	T15/1	T17/1	BV5/1	BV5/1 Bp	T9/1 Bp	T 10/1	T 10/1 Adv	T 10/1 Adv/SM B Parkett	T 10/1 Parke tt	T7/1	CV 38/2	ID CV 38/2	T7/1 Classi c EU2	T7/1 Classi c DIY Pipt 200	CV 30/1	CV 38/1	ID CV 30/1	GD 930	GD 930 HEP A	GD 930S 2	VU50 0 12	VU50 0 15	VP 30 0 EC 0	VP 300 HEP A c)				
Rated input power (W)	1300	1300	1300	1300	1200	1200	1180	1150	1150	1150	1150	1150	1150	1150	1100	1100	1100	1100	1100	1050	1050	1050	1000	1000	1000	1000	1000	1000	1000	1000	1000	1000	900	900				
Energy efficiency (class)	E	E	E	E	D	C	G	E	C	E	E	E	E	E	E	E	E	C	C	E	C	C	D	D	D	D	D	D	D	D	D	D	C	C	C			
Carpet cleaning performance (class)	C	E	E	E	E	E	E	E	--	E	E	E	D	D	E	E	E	--	--	F	D	D	E	E	D	D	D	D	D	D	E	E	D	E				
Hard floor cleaning performance (class)	--	D	D	D	-	-	--	A	D	C	C	A	D	D	C	C	C	C	D	B	-	*	C	C	-	-	*	D	D	D	-	-	C	D				
Dust re-emission (class)	C	F	F	E	C	C	B	C	C	B	C	C	B	B	D	C	C	C	C	D	E	E	G	G	F	F	F	G	G	G	C	C	G	F				
Annual energy consumption kWh/year a)	51.8	50	48	49	43	34	60.9	49.8	34.2	48.6	48.3	49.8	47.8	47.8	46.5	48.6	48.6	36.8	34.2	47.5	37.4	37.4	40.6	40.6	42.4	37.8	42.4	42	42	42	43	34	35	39				
Sound power level dB(A)	77	78	83	78	79	79	76	77	77	73	73	77	78	78	81	75	75	75	75	75	75	75	75	75	80	80	75	75	80	80	80	71	71	71	72	72	67	67

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