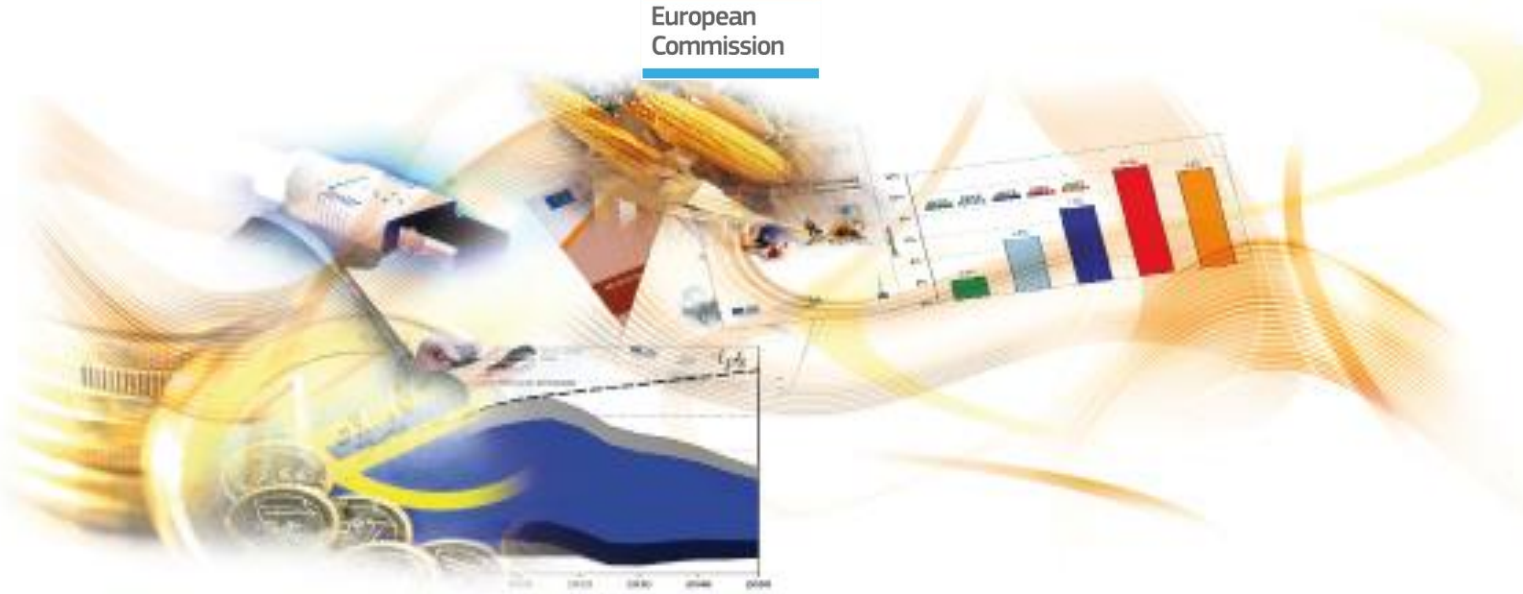




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J R C T E C H N I C A L R E P O R T S

Development of the EU Ecolabel Criteria for Indoor Cleaning Services

Final Technical report and criteria proposal

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1. TERMS AND DEFINITIONS

Cleaning	'Cleaning' has the meaning defined by the 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 glass 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 detergent, dishwasher detergent).
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 sanitary cleaning tasks include the cleaning of sinks, toilet bowls and urinals, the washing of floors, the emptying of rubbish and sanitary bins and the cleaning of 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 sterilisation techniques that eliminate <i>all</i> micro-organisms and germs.
Glass cleaning	'Glass cleaning' refers to the routine* cleaning of glass surfaces, including mirrors. With regard to the present project, glass cleaning is limited to the cleaning of indoor glass areas that can be accessed without the use of any specialised equipment or machines. This excludes window cleaning at altitude, for which special training and equipment is required. *As glass surface 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 glass 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).
Undiluted cleaning products	'Undiluted cleaning products' refers to products that must be diluted before their intended use. For these types of products, dilution instructions must be provided by

	the manufacturer.
Concentrated cleaning products	'Concentrated cleaning products' refers to products where manufacturers claim these are 'concentrated' in the sense that less product is required for the same function. This term can also be used in conjunction with 'undiluted' meaning a product for which the dilution rate is significantly higher than usual.
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	'Consumable goods' 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), textile towel rolls 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 label	'Type I label' 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 a better overall environmental performance of a product within a particular product category based on life cycle considerations.
Private residence	'Private residence', 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).

2. EXECUTIVE SUMMARY

The objective of the present project was, in a first step, to develop criteria for a new EU Ecolabel for Indoor Cleaning Services and, in a second step, to revise the existing EU Green Public Procurement (GPP) criteria for cleaning services. The work on the EU GPP Cleaning Services criteria can be found on the project website:

<http://susproc.jrc.ec.europa.eu/cleaning%20services/stakeholders.html>.

This report is the final technical report published in the scope of the project and aims to substantiate the criteria for the EU Ecolabel for Indoor Cleaning Services adopted with the Commission Decision (EU) 2018/680 of 2 May 2018.

The first proposal of the criteria was presented to stakeholders at the first ad-hoc working group (AHWG) meeting held on 22nd January 2015 in Seville, while the second draft was presented at the second AHWG meeting held on 23rd October 2015 in Brussels. The third draft of the technical report was published ahead of the November 2016 EU Ecolabelling Board meeting and then updated before the June 2017 EU Ecolabelling Board meeting. Stakeholder feedback was collected after each of the meetings and has been reflected in this report.

This report consists of the following sections:

- *Introduction*, outlining the purpose of the report and a brief summary of the Preliminary Report, linking the environmental hotspots found to the criteria proposed in this document.
- *Product group specifications*, including product group name, definition and scope, and other general indications related to this EU Ecolabel, such as application specification, general assessment and verification terms, and a description of the point system.
- *Proposed criteria* for the EU Ecolabel for indoor cleaning services, with supporting rationale, divided into mandatory and optional criteria.
- *Annexes*, including stakeholder feedback and indications as to if and how it has been implemented in the proposed criteria text.

3. INTRODUCTION

The following document is the final 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, which is available on the JRC website¹.

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.

3.1. Aim of this report

The main purpose of this document is to introduce new EU Ecolabel criteria for the product group “cleaning services” based on technical analysis that includes, among others, a review of Life Cycle Assessments (LCA) and other scientific sources, industry publications, company interviews, and input received from stakeholders. This document is complemented by the Preliminary Report, which summarises previous tasks on the 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.

The current report is structured as follows:

- The rest of Section 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 different versions of the Technical Report.
- Section 2 details the proposed name, scope and definitions for the product group, as well as indications on assessment and verification and the point system.
- Each proposed criterion is outlined in Section 3, followed by the assessment and verification requirements set out for each one. The rationale for each criterion is based on information collected in the initial phases of the project (Preliminary Report), industry publications, company interviews and feedback received from stakeholders.
- Annexes A, B and C contain tables showcasing the comments received on the first three drafts of the Technical Report and indications as to if and how they have been implemented in the present document.
- Annexes D and E offer further insight on the point system and Annex F on the Energy Label for vacuum cleaners.
- Annex G sums up the results of a limited online survey conducted on cleaning company practices following the 2nd AHWG meeting.

¹ <http://susproc.jrc.ec.europa.eu/cleaning%20services/stakeholders.html>

3.2. Summary of the Preliminary Report on Cleaning Services

The following section provides a summary of the market analysis, technical and environmental evidence developed in the previous stages of the project that underpin the development of the EU Ecolabel criteria for Indoor Cleaning Services. The Preliminary Report that contains the details of the information summarised below can be found on the project website².

3.2.1. Market analysis

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

- The total estimated turnover of the cleaning service industry for 2010 was €81 billion for the EU27 (Eurostat, 2010). The services within scope (offices, schools and leisure organisations, windows and reception areas) represented 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 the 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 companies. 202 000 cleaning companies are present in Europe, of which 75% employ fewer than 10 people (Eurostat, 2010; EFCI, 2012). Large companies that employ over 500 people only constitute 1,5% of the total (EFCI, 2012).
- The estimated volume of professional cleaning products used in the EU28, Norway and Switzerland is estimated at 590 000 tonnes of product per year, with an estimated value of €886 million.
- No specific data was available on the sales of sustainable cleaning products or services. However, the rising number of signatories to charters (e.g. AISE Sustainable Cleaning Charter) or voluntary schemes (e.g. EU Ecolabel, Nordic Swan) indicates that there are a market and interest for sustainable products and services.
- No accurate data exists on cleaning equipment and accessories use. However, anecdotal evidence from stakeholders suggests the volume of cleaning equipment and accessory sales is considerably smaller than that of cleaning products as the former 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.

² <http://susproc.jrc.ec.europa.eu/cleaning%20services/stakeholders.html>

- 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 service providers to invest in new technologies that help them increase efficiency and lead to cost reduction.
- Sustainable practices in the cleaning service industry are driven by resource and cost saving opportunities, government policies, voluntary standards and market demand.

3.2.2. 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 analyses 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 also 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** – Cleaning service providers face high pressures from clients to lower costs, 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 face 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 for environmental and social hotspots
Cleaning product, supplies and accessories	<p>Criterion M1/O1: Use of cleaning products with lower environmental impact</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, Baldwin, Swanson, Wilberforce, McClenachan, & Rentschler, 2012). Surfactants can be of mixed origins, i.e. both oleochemical 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. Well thought-out cleaning product packaging can also help reduce their environmental impact by reducing transport emissions and also lowering the amount of raw materials needed and impacts at the end-of-life of the packaging (European Commission Joint Research Centre, 2014).</p> <p>Hotspots addressed: Cleaning product formulation (raw materials, ecotoxicity, health risks), Packaging of cleaning products</p>
	<p>Criterion O4: Use of cleaning supplies and accessories with lower environmental impact</p>	<p>The manufacturing process of gauze fibres can contribute up to 75% to the depletion of abiotic resources impact category for office floor cleaning (both cleaning equipment and activities) (ADEME, 2010).</p> <p>Hotspots addressed: Raw material extraction, manufacturing and end-of-life of disposable cleaning supplies</p>
	<p>Criterion O2: Use of concentrated undiluted cleaning products</p>	<p>Water makes up a large portion of cleaning products (up to 95% of window cleaners), and therefore its transport makes up a significant portion of the transport impacts associated with cleaning products. The use of undiluted products can reduce these impacts, and this can be further accentuated by using concentrated undiluted products for which the water content is even lower (European Commission Joint Research Centre, 2014).</p> <p>LCA studies confirm 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. A concentrated undiluted product can provide the same number of uses with a lower amount of packaging, thus lowering the associated environmental impacts (European Commission Joint Research Centre, 2014; Kapur, Baldwin, Swanson, Wilberforce, McClenachan, & Rentschler, 2012; AISE, 2014).</p> <p>Hotspots addressed: Packaging of cleaning products, transportation</p>
	<p>Criterion M3/O3: Use of microfiber products</p>	<p>The use of microfiber products has been shown to reduce the amount of product necessary for efficient cleaning as well as overall water consumption linked to cleaning activities (UNEP, 2008).</p> <p>Hotspots addressed: Raw material extraction, water consumption</p>

Cleaning operations/ power equipment	Criterion M2: Cleaning product dosing	Environmental impacts related to the formulation of products and their manufacturing can be reduced by encouraging users to use 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 unnecessary chemical loads to waterways (European Commission Joint Research Centre, 2014; Koehler & Wildbolz, 2009). Hotspots addressed: Raw material extraction, ecotoxicity
	Criterion O6: energy efficiency for vacuum cleaners	In cleaning services, the main powered cleaning equipment used is floor cleaning machines (e.g. vacuum cleaners, rotary floor machines). For these 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 (European Commission, 2009). Hotspots addressed: Energy in the use phase of cleaning products and power equipment
Operational management	Criterion M4: Staff training	Staff training contributes to making sure that the other criteria are effective, such as training on the use of correct dosing and dilution, waste sorting. Hotspots addressed: All hotspots covered by other criteria
	Criterion M5/O6: Basics of an EMS, EMAS registration, ISO 14001 certification of the service provider	An Environmental Management System helps companies better their environmental practices over time and helps enhance the efforts made in the other criteria. Hotspots addressed: All hotspots covered by other criteria
	Criterion M6/O7: Solid waste sorting and disposal	Cleaning services generate waste that should be dealt with according to local legislation in order to ensure that cleaning products, supplies and accessories do not unnecessarily contribute to increasing pollution problems. Hotspots addressed: Waste treatment (solid and liquid waste sorting and collection), end-of-life
	Criterion O8: Quality of the service	Hotspots addressed: N/A, addresses quality of service to ensure that EU Ecolabel Indoor Cleaning Services are of good quality in order to reflect well on the image of the EU Ecolabel
Social	EU Ecolabel pre-requisites	Hotspots addressed: N/A, addresses social issues linked to wage requirements as allowed by the EU Ecolabel Regulation

Other products and services	<p>Criterion 09: Vehicle fleet owned or leased by the applicant</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. Moreover, as people play an important role in cleaning services, their transport is also a significant contributor to transportation impacts (source: stakeholder interviews).</p> <p>Hotspots addressed: Energy consumption and air emissions of road transport</p>
	<p>Criterion 010: Efficiency of laundry washing machines owned by the applicant</p>	<p>As for other energy-consuming appliances, the energy and water efficiency of washing machines that might be used as part of cleaning services (in order to wash e.g. mops, cloths, uniforms) can be increased in order to lower environmental impacts.</p> <p>Hotspots addressed: Water and energy consumption</p>
	<p>Criterion 011: Outsourced auxiliary services and products</p>	<p>Several products and services not mentioned above can be used in the scope of indoor cleaning services. For many of these, there are environmentally preferable versions that can be purchased and used in order to lower the environmental impact of the cleaning service as a whole.</p> <p>Hotspots addressed: Raw material extraction, energy use, water and energy consumption</p>

3.2.3. *EU Ecolabel and the Eco-Management Audit Scheme (EMAS)*

During the development of the EU Ecolabel criteria, questions arose about the potential overlap between the EU Ecolabel criteria and the Eco-management Audit Scheme (EMAS). Indeed, the EU Ecolabel and EMAS are voluntary policy tools with different goals and frameworks. The EU Ecolabel is awarded to 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. The companies that wish to participate in EMAS should develop an environmental management system (EMS) and commit to continuously improving their environmental performance. They also must 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, which can be used as general guidelines. These documents contain the description of best practices for improving 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 must take these documents into account, but there is no obligation to follow the best practices or achieve any benchmark.

The EU Ecolabel can be awarded to the 10-20% best-performing products or services on the market that show that they reduce environmental impacts along the different life cycle stages of a product or service through the fulfilment of a set of criteria. Within this proposal for criteria for the EU Ecolabel for Indoor Cleaning Services, specific requirements are set for the provision of services and the related use of products and equipment. The identified thresholds constitute pass or fail requirements for awarding the EU Ecolabel and the EU Ecolabel is awarded after 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. 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: using the EU Ecolabel as a tool to communicate to the market that a certain service or product achieves a very high environmental performance and EMAS as a process to further improve environmental performance at an organisational level.

The present proposal for the EU Ecolabel criteria for Indoor Cleaning Services is an example of how the two voluntary frameworks can complement each other: Criterion M5 on the basis of an EMS (mandatory) and Criterion O6 on EMAS registration or ISO 14001 certification of the service provider (optional) show the synergies between the EU Ecolabel criteria and EMAS. 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 service 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.

3.3. Main changes between the 1st and 2nd Technical Report proposals for criteria

The following section lists the changes that were proposed to the criteria between the 1st and 2nd drafts of the Technical Report; both can be found on the project website.

Point system - A major change concerned the structure of the criteria and the introduction of a point system that would allow more flexibility for applicants. Stakeholders expressed a 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 EU28. In the 2nd TR, the criteria were split into two categories, mandatory and optional, with all the optional criteria being assigned points.

Proposal for new optional criterion on quality management – A new proposal was made for the inclusion of an optional criterion for quality management. This was identified as a relevant area to tackle during the 1st AHWG meeting to ensure that the EU Ecolabel services provided correspond to a high level of quality.

Proposal of a separate criterion on consumable goods – The 2nd TR also added a separate criterion covering consumable goods 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 the 1st TR; however, no clear distinction had been made between consumable goods (e.g. toilet paper) and accessories (e.g. cloths and mops). This was an oversight as the first ones may be eventually used in the service provision but are not specifically used to clean.

Extension of the criterion on auxiliary services and products – A major change was introduced in the 2nd TR concerning outsourced auxiliary services and products – the 1st TR only considered laundry services and staff uniforms but many more types of services and products can play an important role in the provision of cleaning services.

EMS considered in two separate criteria – With the introduction of the point system, the criterion on environmental management measures and practices was proposed to be split into two criteria, one mandatory and one optional. The mandatory criterion covers the basic requirements for an environmental management system, with the most important measures and practices listed as part of the requirements, and the optional criterion covers the implementation of a third-party verifiable environmental management system according to the EMAS scheme and /or to the certification standard ISO 14001.

Removal of criterion on recycled content in disposable cleaning supplies –The 1st TR proposed a criterion requiring the use of 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 manufacturing 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 labelled 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. Thus, due to lack of market availability for ecolabelled bin bags, the 2nd TR did not propose to consider them in the criteria.

Due to concerns linked to health and safety implications and their availability, the 2nd TR also did not propose to 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.

Removal of criterion on purchase of more durable and reusable cleaning accessories and supplies – The use of single-use cleaning supplies was identified as an environmental hotspot for cleaning services as they require more raw materials to make and generate more waste. 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). Thus, in the 2nd TR, no criterion stated requirements on the use of reusable gloves but a mention was added to the training criterion that staff should receive information on the topic during staff training.

Removal of criterion on the use of room temperature water in cleaning product dilution – The 1st TR opened a discussion on this issue but the majority of the stakeholder feedback agreed that the content of this criterion should be integrated into the staff training. While LCA studies and early stakeholder feedback suggested that heated water is commonly used for diluting cleaning products, 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 for it to be used in the real world. Moreover, a criterion on dilution water temperature is not verifiable outside on-site visits.

Removal of criterion on wastewater discharge – This criterion was proposed in the 1st TR to ensure that wastewater is discarded in appropriate channels and is treated in water treatment plants. The majority of the stakeholder feedback agreed that this criterion should be integrated into 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 as cleaning companies have no control over the disposal facilities provided at clients' sites, potentially making this criterion difficult to implement, but also verify.

Removal of criterion on labour standards – The 1st TR proposed a criterion that required that fundamental principles and rights at work (as described in the International Labour Organisational (ILO) Core Labour Standards) were met. While most of the stakeholder comments agreed that the cleaning service industry as a whole has significant issues on social performance,

the majority of the stakeholder feedback suggested that the ILO standard is not entirely relevant to the European market and the requirement may cause unnecessary administrative burdens.

3.4. Main changes between the 2nd and 3rd Technical Report proposals for criteria

Addition of multiple optional criteria to acknowledge companies that go beyond the requirements in the mandatory criteria – Multiple optional criteria were introduced in the 3rd TR in order to offer the option for cleaning companies to aim for a high percentage of more environmentally conscious products and reward those that already are using those high percentages. This approach also helped acknowledge that currently some parts of the EU28 still do not have access to a large number of these types of products.

Criterion on consumable goods no longer mandatory – The criterion on consumable goods was proposed to be optional in order to award points to applicants providing ecolabelled products when they are responsible for supplying consumable goods to be used at the clients' sites in at least one of their contracts. This amendment (changing the criterion from mandatory to optional) was suggested by stakeholders based on the fact that cleaning companies also supplying consumable goods are not always able to have a say in the type of products and brands they supply. Setting a mandatory criterion on consumables would favour applicants that never provide consumable goods as part of their contracts as they would always comply.

Criterion on wage policy as part of pre-requisites – Following discussions during the revision of the EU Ecolabel criteria for Tourist Accommodation Services and in alignment with the work done for those criteria, the criterion on wage policy was proposed to be withdrawn. All the social aspects are now covered in the pre-requisites.

Extra requirements set out in criterion on washing machines and vehicle fleet – The criterion on washing machines was proposed to be updated with requirements on water consumptions as this has been highlighted as a hotspot. This is in line with the requirements set out in the EU Ecolabel criteria for Tourist Accommodation Services. Moreover, the use of electric cars was also awarded as part of the criterion on vehicle fleet, along with Euro 6 cars.

3.5. Main changes between the 3rd and 4th Technical Report proposals for criteria

Restructuring of the Act – The structure of some of the Articles in the Act have evolved to ease understanding and streamline the text.

Scope of who can apply – The scope has been clarified following stakeholder feedback, with an expanded description of who can apply and the fact that a company cannot provide both EU Ecolabel and non-EU Ecolabel indoor cleaning services. The rules of sub-contractors have also been made stricter.

Criterion on "Information appearing on the EU Ecolabel" – While the use of the EU Ecolabel logo is dictated by the specific guidelines that appear separately from EU Ecolabel criteria, the EU Ecolabel Regulation states that an optional text box can be included next to the logo with three key environmental statements related to the product group or service. This criterion was previously omitted from the criteria and this has been rectified.

Criteria text clarification – Several criteria texts have been updated following remarks about clarity from stakeholders. These include criteria where the opening phrases have been amended to clearly highlight that only products that are used in the EU Ecolabel cleaning services provision should be counted towards the respective percentages.

Extra thresholds for optional criteria – For a few criteria, extra thresholds have been added in order to offer even more flexibility to applicants. These thresholds have been assigned 1 point as they are only marginally more ambitious than the mandatory criteria.

Criteria numbering – The structure of the optional criteria set has been slightly altered to reflect that the criterion on consumable goods is not directly related to the provision of cleaning services. As such, some of the criteria numbers were amended.

Criterion 05 on the energy efficiency of vacuum cleaners – The requirements have been updated to reflect that new energy classes have come into force in September 2018.

Criterion 09 on the vehicle fleet owned or leased by the applicant – Sub-criterion 09(b) now explicitly mentions cargo-bikes and e-cargo-bikes as alternative modes of transportation that fall under the scope of the criterion.

4. PRODUCT GROUP SPECIFICATIONS

4.1. Product group name, definition and scope

Proposed scope and definitions:

- 1 The product group 'indoor cleaning services' shall comprise the provision of routine professional cleaning services, performed indoors in commercial, institutional and other publically accessible buildings and private residences. Areas where cleaning services are performed may include, but are not limited to, office areas, sanitary facilities and publically accessible hospital areas, such as corridors, waiting and break rooms.
- 2 It shall also comprise the cleaning of glass surfaces that can be reached without the use of any specialised equipment or machines.
- 3 This product group shall not comprise disinfection activities or cleaning activities taking place on production sites or activities for which the cleaning products are provided by the client.

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

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

Rationale of proposed scope and definition

The proposal for the product scope and definitions is based, among others, on market data, a review of existing environmental schemes, legislation, standards, a stakeholder consultation questionnaire and other stakeholder feedback.

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 (i.e. professional cleaning in private residences) currently does not seem

to represent a significant market share even though companies providing such types of services exist.

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 private 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 (i.e. in private residences) alongside the cleaning of commercial, public and institutional buildings (Table 4, Chapter 1 of the Preliminary Report).

Stakeholder feedback on the proposed scope and definitions was sought out throughout the project. A number of stakeholders agreed that private residences should 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) and is already included in the scope. Stakeholder feedback also suggested that indoor glass/window cleaning should be considered part of the tasks routinely carried out in indoor cleaning of buildings, even if not on a monthly basis. There was a consensus that window cleaning that requires special training and equipment should be out of the scope. In order to avoid misunderstandings and to highlight that the main target is indoor glass, the wording makes strict reference to "glass cleaning" rather than "window cleaning". The inclusion of hospitals within the scope was the subject of debate, with a compromise being found on only publically accessible areas being included. Although the areas designed as "publically accessible" might differ from region to region or even hospital to hospital, they should be considered as areas that do not require routine disinfection. Indeed, disinfection activities are explicitly excluded from the proposed scope and therefore areas that require routine disinfection (e.g. operating theatre) are also automatically excluded.

With 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). Moreover, all cleaning services performed where the client provides the cleaning products is also out of the scope as the applicant would have no power to choose the types of products they work with and criterion M1 would become unverifiable. This is problematic as the impact of chemicals related to cleaning services has been highlighted as an environmental hotspot and the use of products with fewer impacts should be ensured.

4.2. Proposal for the specification for EU Ecolabel applicants

Proposed text specifying what can carry the EU Ecolabel

1. In order to be awarded the EU Ecolabel under regulation (EC) No 66/2010, a service shall fall within the product group 'indoor cleaning services' as specified in Article 1 of this Decision and shall fulfil the related assessment and verification requirements set out in the Annex to this Decision as well as the following conditions:

(a) it complies with all the mandatory criteria set out in the Annex to this Decision;

(b) it complies with a sufficient number of the optional criteria set out in the Annex to this Decision in order to score at least 14 points;

(c) it is subject to separate accounting records in relation to other services provided by the same operator that do not fall within the scope of this Decision, including other indoor cleaning services that do not fulfil the requirements set out in this Decision.

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

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

3. Where an operator that has been awarded the EU Ecolabel for indoor cleaning services makes use of sub-contractors for the provision of such services, these must also hold an EU Ecolabel licence for indoor cleaning services.

Rationale of proposed text

During the early stages of the project, several stakeholders highlighted that it is essential to define who will be able to apply for the EU Ecolabel (e.g. whole companies, departments, single contracts) and how the verification process would work. Moreover, the issue of 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 was raised.

A review of other ecolabel schemes (e.g. Green Seal, Australian Ecolabel Program, Nordic Swan) covering cleaning services showed that the most commonly defined scope for label applicants falls at a service line level (Table 3).

Table 3: 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	<p>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.</p>
The Australian Ecolabel Program Good Environmental Choice Australia Standard Cleaning Services	<p>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.</p>

Based on these findings, it is proposed that if a company provides a professional indoor cleaning service as part of their business portfolio, the service fulfils the requirements set out in the criteria, and that there is separate accounting related to the service (in the form of e.g. a separate sub-part of the company, separate company or department), they can apply for that individual service to be awarded with the EU Ecolabel. The keeping of separate records is a requirement prior to the awarding of the EU Ecolabel licence and also once it has been awarded. Other services provided by the business that fall outside the scope of the EU Ecolabel will not be covered under the EU Ecolabel license.

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. Nevertheless, other stakeholders stated that the EU Ecolabel should be awarded for cleaning service contracts as they consider that, among others, it would simplify the verification process. With the current process that should be followed to be awarded the EU Ecolabel, the application process could only start once the contract has been signed, making the process very time inefficient. Furthermore, with such a system a company could not advertise that they can provide EU Ecolabel services, only that they have had previous contracts covered by the EU Ecolabel. Moreover, discussions with companies showed that while some might have a few large contracts, there are companies, and especially SMEs, that have a large number of smaller contracts, which are often short and it would not be possible for them to seek an EU Ecolabel for these contracts. Further, some others requested a requirement for a clear delineation between the EU Ecolabel cleaning services and any other services that a company could provide, with ideally the whole company just focusing on cleaning services. The final

wording does request that the applicant represent either the whole company or a well-defined and delineated part of a company.

A special note is also proposed for the case of companies that rely on the work of sub-contractors, which is a common practice in some parts of the EU. To ensure that the services provided are of EU Ecolabel quality and meet all the set requirements, it is proposed to require all sub-contractors to also hold an EU Ecolabel. This option was chosen to facilitate the verification of the criteria and to avoid loopholes that could be achieved through the use of sub-contractors. During the criteria development process, the option of limiting the amount of work that can be outsourced if the sub-contractor does not also hold an EU Ecolabel licence was proposed. The verification of such a restriction was not easily feasible as e.g. it was not certain if the verification should be done through the tasks outsourced, the time spent by sub-contractors or by monetary value.

As for all other product groups, a User Manual will be issued for the EU Ecolabel for Indoor Cleaning Services and will be a guidance document that will provide examples of who/what can apply. It will also list best practices in terms of setting up separate accounting for a cleaning service line in view of applying for the EU Ecolabel.

4.3. Proposal for the assessment and verification process

Proposed assessment and verification

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

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

Competent bodies shall give preference to attestations that are issued by bodies accredited under the relevant harmonised standard for testing and calibration laboratories and checked by bodies that are accredited under the relevant harmonised standard for bodies certifying products, processes and services. Accreditation shall be carried out in line with Regulation (EC) No 765/2008 of the European Parliament and of the Council³.

Information extracted from environmental statements submitted under Regulation (EC) No 1221/2009 of the European Parliament and of the Council⁴ may be used as means of proof instead of the attestations mentioned in the previous paragraph.

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

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

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

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

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

The applicant shall declare and demonstrate that the services are compliant with those requirements by using independent verification or documentary evidence that is without prejudice to the national law on data protection (e.g. copy of a written social policy, copies of contracts, statements of employee's registration in the national insurance system, official documentation/register recording the names and number of employees by the local government's employment inspectorate or agent).

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

³Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and market surveillance relating to the marketing of products and repealing Regulation (EEC) No 339/93 (OJ L 218, 13.8.2008, p. 30).

⁴Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS), repealing Regulation (EC) No 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC (OJ L 342, 22.12.2009, p. 1).

Rationale of proposed text

The EU Ecolabel for indoor cleaning services faces unique challenges for the assessment and verification of applications as no products are manufactured that can be assessed, but rather services are provided year-round and performed at the premises of multiple clients. Moreover, many criteria require periodic verification throughout the validity of the licence.

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 services are provided can vary between contracts and clients, complicating the assessment and verification procedures. Indeed, contractual requirements on the use of cleaning products and the delivery of cleaning services are predominately determined by clients.

In the EU Ecolabel approach, each criterion text is followed by assessment and verification requirements that list the documentation to be provided to the Competent Body in charge of the dossier. In the case of cleaning services, some criteria might fall under the usual work of sub-contractors and, as such, a specific mention is made that sub-contractors can provide the documentation. The work of sub-contractors is discussed in Section 4.2.

Moreover, the overall provision of services is to be verified through on-site visits. 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 of the EU Ecolabel service line. While such an approach would be ideal, it might not be realistic in all EU28 countries and there might be a lack of resources on the side of certain Competent Bodies. As a starting point, it is proposed that Competent Bodies shall carry out an on-site visit at the applicant's premises to verify the provided documentation and the functioning of the company. This first visit should be complemented by at least one on-site visit to a client's premises 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 Competent Bodies schedule multiple on-site visits as part of market surveillance, as their resources allow. In order to facilitate on-site visits, it is further proposed that the applicant should provide an up-to-date list of cleaning sites where they provide EU Ecolabel services on an annual basis once they have been awarded the EU Ecolabel licence.

4.4. Proposal for the point system

The criteria 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 applicant must fulfil all the mandatory criteria.

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. Each optional criterion is given a score (points) and, in order to be awarded the EU Ecolabel, the applicant must earn a minimum of points, as indicated in the text below. Details on the reasoning behind the separation of mandatory and optional criteria can be found below. Annex D demonstrates the method used for assigning points to the optional criteria set and Annex E lists the points allocated.

Proposed point system structure (maximum of 43 points are available for applicants)

1. In order to be awarded the EU Ecolabel under regulation (EC) No 66/2010, a service shall fall within the product group 'indoor cleaning services' as specified in Article 1 of this Decision and shall fulfil the related assessment and verification requirements set out in the Annex to this Decision as well as the following conditions:

- (a) it complies with all the mandatory criteria set out in the Annex to this Decision;
- (b) it complies with a sufficient number of the optional criteria set out in the Annex to this Decision in order to score at least 14 points;
- (c) it is subject to separate accounting records in relation to other services provided by the same operator that do not fall within the scope of this Decision, including other indoor cleaning services that do not fulfil the requirements set out in this Decision.

Rationale of Proposed Point System

In the early stages of the project, 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.

- **Structure of the point system**

The criteria set for the EU Ecolabel of Indoor Cleaning Services are divided into two sections: mandatory and optional criteria.

Mandatory criteria must be fulfilled by all the applicants. These criteria ensure that a baseline is met in terms of environmental performance by all the EU Ecolabel cleaning services. The method used to identify the mandatory criteria from the overall set of criteria is detailed in the section below. Optional criteria are assigned a certain number of points based on three factors (environmental improvement, technical feasibility and costs) and each applicant must reach a minimum amount 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.

A maximum of 43 points can be scored with the proposed set of optional criteria. The minimum number of points that is proposed to be required is 14.

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

The separation of criteria into mandatory and optional has been done through the consideration of the specificities of this particular product group, cleaning services, and the methodology used for the establishment of a point system in another product group, tourist accommodation. The parameters considered include the expected *environmental improvements* (50%) and the *technical feasibility* (20%) and *costs* (30%) linked to 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 1) to a comparatively high predicted improvement (marked as 5).

Technical feasibility. Criteria may be easy or difficult to implement. The implementation feasibility was evaluated on a scale from difficult to implement (marked as 0) to a comparatively easy implementation (marked as 1). A criterion was considered as difficult to implement if it requires a large amount of human resources and/or implementation time.

Costs. Criteria implementation may result in a low or high cost. The implementation cost was evaluated on a scale from high investment cost (marked as 0) to low investments cost (marked as 1). 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 feasibility and costs. This led to a first screening to identify the set of mandatory criteria (Annex D), with the mandatory criteria being the ones that have comparatively larger environmental improvement potential when compared to the other criteria screened. For criteria where a subject is proposed to be considered both in a mandatory and optional criterion, the point score concerns the "extra" effort necessary to go from fulfilling the requirements in the mandatory criterion to those in the optional criterion. 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, including SMEs.

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

Optional criteria aim to raise the environmental performance of a cleaning service, while allowing applicants to focus on specific areas that are more in line with their practices. Each of the optional criteria has been assigned a score from 1 to 5 points, based on the same three aspects described above (environmental improvement, technical feasibility and costs) by using a quantitative scale. For each aspect, a number (integer) between 1 and 5 is attributed, as shown in Table 4. Overall, more points are attributed to a criterion with more potential environmental gains and where a bigger effort is needed in terms of technical and economic aspects. The final score for each criterion is obtained by attributing weights to each aspect, as follows: 50% for

environmental improvements, 20% for technical feasibility and 30% for implementation costs. The weights are assigned according to, in part, the work performed for an existing EU Ecolabel (as e.g. EU Ecolabel for Tourist Accommodation) (ANPA, 2005) and they are based on the fact that environmental improvements are at the heart of the EU Ecolabel and that costs play a major role for cleaning services.

Table 4: Parameters to score criteria in the proposed point system

Assessment parameters	Environmental improvement (Scale 1 to 5)	Technical feasibility (Scale 1 to 5)	Costs (Scale 1 to 5)
Points	1 = low improvement 5 = high improvement	1 = easy to implement 5 = difficult to implement	1 = low investment / cost 5 = high investment / cost
Assigned weights	50%	20%	30%

Annex D (Table D.2) presents the score obtained for each optional criterion by using the methodology described above.

Overall, the applicant will have to 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 for optional criteria is 43 points. In order to qualify to be awarded with the EU Ecolabel, a service provider must score a minimum of 14 points (33% of the overall points achievable). This requirement has been set considering that a company will have to comply with at least seven optional criteria and this has already been stated as quite ambitious by cleaning service providers. After the 2nd AHWG meeting, some stakeholders asked for the minimum score to be raised to at least 50% of the overall points achievable – if this were done with the present criteria, very few companies would be able to apply and almost no, if any, SMEs. Of course one way this issue could be sidestepped is by creating easy-to-pass criteria that would artificially inflate the number of points all companies can score. Such criteria belong in the mandatory set and not in the optional criteria to be awarded points.

5. PROPOSAL FOR CRITERIA

As described in Section 4.4, the criteria are divided into mandatory and optional criteria. All applicants must meet the mandatory criteria and meet enough optional criteria to fulfil the indicated minimum number of points.

5.1. Mandatory criteria

5.1.1. Criterion M1: Use of cleaning products with low environmental impact

Criterion M1: Use of cleaning products with low environmental impact
<p>Only products directly used during EU Ecolabel indoor cleaning service tasks are covered by this criterion. Both criteria M1(a) and M1(b) shall be fulfilled by the applicant.</p> <p>M1 (a) EU Ecolabel and other ISO type I label products</p> <p>At least 50% by volume at purchase of all cleaning products used per year, excluding wet wipes, other pre-moistened products and products used for the impregnation and conservation of mops (during the laundry process), shall have been awarded the EU Ecolabel for hard surface cleaning products in accordance with Commission Decision (EU) 2017/1217⁵ or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States.</p> <p><i>Assessment and verification:</i></p> <p>The applicant shall provide annual data (commercial name and volume of products) and documentation (including relevant invoices or site inventories) indicating the cleaning products used in the EU Ecolabel indoor cleaning service contracts. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate and/or packaging label showing that it was awarded in accordance with Decision (EU) 2017/1217.</p> <p>Where other ISO type I label products are used, the applicant shall provide a copy of the type I label certificate and/or packaging label.</p> <p>M1(b) Hazardous Substances</p> <p>(i) All products that have not been awarded the EU Ecolabel for hard surface cleaning products or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States shall not contain substances listed in EU</p>

⁵ Commission Decision (EU) 2017/1217 of 23 June 2017 establishing the EU Ecolabel criteria for hard surface cleaning products (OJ L 180, 12.7.2017, p. 45).

Ecolabel Criterion 4(a)(i) for hard surface cleaning products, regardless of concentration.

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

(iii) All products that have not been awarded the EU Ecolabel for hard surface cleaning products or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States shall not be classified and labelled as being acutely toxic, a specific target organ toxicant, a respiratory or skin sensitiser, carcinogenic, mutagenic or toxic for reproduction, or hazardous to the environment, in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council⁶, and as interpreted according to the hazard statements listed in **Error! Reference source not found.**

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

Table 1. Restricted hazard classifications and their categorisation

Acute toxicity	
Category 1 and 2	Category 3
H300 Fatal if swallowed	H301 Toxic if swallowed
H310 Fatal in contact with skin	H311 Toxic in contact with skin
H330 Fatal if inhaled	H331 Toxic if inhaled
H304 May be fatal if swallowed and enters airways	EUH070 Toxic by eye contact
Specific target organ toxicity	
Category 1	Category 2
H370 Causes damage to organs	H371 May cause damage to organs
H372 Causes damage to organs through prolonged or repeated exposure	H373 May cause damage to organs through prolonged or repeated exposure
Respiratory and skin sensitisation	
Category 1A	Category 1B
H317: May cause allergic skin reaction	H317: May cause allergic skin reaction

⁶ Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1).

H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled
Carcinogenic, mutagenic or toxic for reproduction	
Category 1A and 1B	Category 2
H340 May cause genetic defects	H341 Suspected of causing genetic defects
H350 May cause cancer	H351 Suspected of causing cancer
H350i May cause cancer by inhalation	
H360F May damage fertility	H361f Suspected of damaging fertility
H360D May damage the unborn child	H361d Suspected of damaging the unborn child
H360FD May damage fertility. May damage the unborn child	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child	H362 May cause harm to breast fed children
H360Df May damage the unborn child. Suspected of damaging fertility	
Hazardous to the aquatic environment	
Category 1 and 2	Category 3 and 4
H400 Very toxic to aquatic life	H412 Harmful to aquatic life with long-lasting effects
H410 Very toxic to aquatic life with long-lasting effects	H413 May cause long-lasting effects to aquatic life
H411 Toxic to aquatic life with long-lasting effects	
Hazardous to the ozone layer	
H420 Hazardous to the ozone layer	

Assessment and verification:

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

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

Rationale of proposed criterion text

The use of cleaning products has been identified as an environmental hotspot for cleaning services. For example, Kapur *et al.* (2012) highlights that the use of cleaning products has dominant impacts on human toxicity and ecotoxicity, while ADEME (2010) concludes that the manufacturing of cleaning products is an environmental hotspot for sanitary cleaning. 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 and works in synergy with Criterion M2 on dosing.

The scope of this criterion is described in the first line and states that *only products directly related to EU Ecolabel indoor cleaning service tasks are covered by this criterion*. It is not aligned with the scope of the EU Ecolabel for Hard Surface Cleaning Products (previously EU Ecolabel for All-purpose Cleaners and Sanitary Cleaners) as, while that EU Ecolabel's scope covers the majority of products used in cleaning services, some products that do not fall under that scope are also used (e.g. specialised routine floor cleaning products) and their environmental impacts should also be considered. The scope does not include products such as laundry detergents and hand soaps that are not used for cleaning tasks and they are tackled in a separate criterion.

The issue of products such as wet wipes and other pre-moistened products was raised by stakeholders as they are sometimes used for specific applications such as specialty floor care. The use of such single-use products is discouraged in the Criterion M4 on Staff Training but it is, in some cases, necessary to avoid opening a new product container for a small application or to avoid contamination. Their packaging does not usually include volumetric information, making it impossible to include them in the calculation in the assessment and verification of M1(a); nevertheless it is proposed that any such product should comply with criterion M1(b) as the chemicals contained on the wipes are to be covered by a Safety Data Sheet (SDS). Pre-impregnated mops are considered to be pre-moistened products.

Pursuant to Article 6(3) of EU Ecolabel Regulation 66/2010, EU Ecolabel criteria should consider "*criteria established for other environmental labels, particularly officially recognised, nationally or regionally, EN ISO 14024 type I environmental labels, where they exist for that product group so as to enhance synergies*". The criterion is therefore structured to enhance the possibility of mutual recognition between different schemes of similar nature.

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

The first part of the criterion encourages the use of products that have been awarded with the EU Ecolabel or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States. As these 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.

M1(a) scope – During consultation it was suggested that natural products such as vinegar should be considered as "environmentally friendly" products and be counted the same as ecolabelled

products. This suggestion was also made as part of the revision work for both the EU Ecolabel for Tourist Accommodation and the EU Ecolabel for Hard Surface Cleaning Products. In the first case, it was decided that only products that have been awarded an EU Ecolabel/ EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States, can be considered as contributing towards the percentage of environmentally preferable products (European Commission Joint Research Centre, 2015) and such products do not fall under the proposed revised scope of the EU Ecolabel for Hard Surface Cleaning Products (European Commission Joint Research Centre, 2014). Thus, vinegar and similar products are not proposed to be given preferential treatment compared to other non-ecolabelled products.

M1(1) threshold – Multiple concerns were raised over the threshold required to pass M1(a), with some stakeholders expressing the view that 50% was not ambitious enough and some stating that availability of EU Ecolabel products was not yet high enough in some parts of the EU28 and that some products are not covered within the scopes of the different EN ISO 14024 type I ecolabels for cleaning products. In order to address both sides, the requirements on the amount of EU Ecolabel/ EN ISO 14024 type I ecolabelled products used is proposed to be separated into a mandatory criterion with a required minimum use threshold of 50% and to award points to companies that use either more with an optional criterion.

With the 50% required minimum threshold, applicants should have no problems with the mandatory criterion, even when a client requests the use of products such as wooden floor cleaners. Indeed, even if there is currently no data available specifically for professional-grade hard-surface cleaning products 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. Other ISO type I labels for cleaning products that fall under the scope of this criterion are present on the European market, including 110 with the Austrian Ecolabel, 4 with the Czech Ecolabel and over 700 that have been awarded the Nordic Swan label (European Commission Joint Research Centre, 2014). 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. Moreover, the EU Ecolabel for Indoor Cleaning Services is proposed to be limited to routine cleaning activities (i.e. excluding disinfection and specialty cleaning) and those mainly require products that do fall under the scope of the updated EU Ecolabel for Hard Surface Cleaning Products and other EN ISO 14024 type I ecolabels that are nationally or regionally officially recognised in the Member States.

To better understand current practices, a limited online survey was conducted (see results in Annex G) asking companies to conservatively estimate their use of EU Ecolabel/ISO type I label products. Results showed that 40% of the respondent easily pass the 50% threshold with their current practices. Moreover, a survey of 227 French companies also showed that around 55% of companies already reach the 50% threshold (FEP, 2016). Thus, the proposed 50% required minimum threshold might be hurdle for some companies but very easy to pass for the best environmental performers in the EU28.

M1(b) Hazardous Substances

While it would be ideal for cleaning service providers to solely use EU Ecolabel/ EN ISO 14024 type I ecolabelled products, it is not always possible due to lack of availability, necessary

products not being within the scope of these ecolabels, etc. Nevertheless, it is important to limit the impact of non-ecolabelled products used and, thus, criterion M1(b) requires that all non-ecolabelled products do not include certain substances above certain threshold and also do not carry certain hazard statements on their labels. The list of substances to avoid makes reference to the criterion in the EU Ecolabel for Hard Surface Cleaning Products, while a list of hazard statements to avoid is provided in the text. This criterion is similar to those found in other ecolabels such as the Nordic Swan and the Australian Ecolabel.

A potential conflict between the requirements of criteria M1(b) and O2 on the use of undiluted products was pointed out by some stakeholders. Research using catalogues of professional cleaning products has shown that undiluted products that are not labelled according to the proposed list are available on the market (e.g. Taski Sprint Emerel QS multi-purpose cleaner (Diversey, 2013)). 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 - Causes severe skin burns and eye damage, H315 - Causes skin irritation, H316 - Causes mild skin irritation) and not the listed environmental hazards.

5.1.2. Criterion M2: Cleaning product dosing

Criterion M2: Cleaning product dosing

Staff performing EU Ecolabel indoor cleaning tasks shall have access to appropriate dosage and dilution apparatus for the cleaning products used (e.g. automatic dispensers, measuring beakers/caps, hand pumps, sprays), either at the cleaning site or at the applicant's premises. They shall also have access to the corresponding instructions for correct dosage and dilution.

Assessment and verification

The applicant shall provide a declaration of compliance with this criterion supported by a list of the apparatus provided and the appropriate documentation showing the instructions on the correct dosage and dilution that is provided to the cleaning staff.

Rationale of proposed criterion text

Cleaning service providers can lower the environmental impact of cleaning product use, as well as address health and safety concerns, by ensuring that all cleaning staff respects the recommended dosage (European Commission Joint Research Centre, 2014). The aim of this criterion is to ensure that all staff have access to apparatus, whether automatic dispensers or much simpler systems such as dosing beakers or even caps on products, and should be checked during on-site visits. It is complemented by a requirement related to correct dosing to be covered in the criterion on Staff Training.

Two approaches were considered during the development of the requirements on product dosing – ensuring that the tools necessary to achieve correct dosing are available to staff and limiting the total amount of chemicals used during cleaning operations. The latter, an approach identical to Nordic Swan's criterion on chemical consumption, was requested by stakeholders but consultation with cleaning companies highlighted that limiting the amount of chemicals used is already in the interest of these companies for monetary reasons and the thresholds to set are not self-evident. This has been partially confirmed by the fact that, as part of the revision of their cleaning services criteria, Nordic Swan are proposing to lower the limit from 640 to 300 microlitres/m², following the review of the data that they have gathered since 2012, and while stating that "there is great variation in the data" (Nordic Ecolabelling, 2016).

Thus, the proposed criterion text is centred on preventing over-dosing and it is left up to the company to assess what is the most appropriate device to do so. During consultation, some stakeholders stated that the provision of such tools is already standard practice but the limited online survey conducted (see results in Annex G) showed that more than half of companies did not provide dosing tools at all or only provided them for dosing undiluted products. Nevertheless, the consultation and the feedback received showed that many respondents understood that only automatic dosing apparatus was considered as fulfilling the requirements and that was, indeed, not the case and the criterion wording has been updated.

5.1.3. Criterion M3: Use of microfiber products

Criterion M3: Use of microfiber products

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

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

Rationale of proposed criterion text

This criterion, along with Criterion O3, aims to encourage the use of microfiber mops and cloths as these types of products help reduce water and cleaning product consumption during cleaning activities and have other benefits for cleaning companies and their staff.

The benefits of using microfiber products in cleaning activities have been demonstrated through multiple studies (e.g. (EPA, 2002) (UNEP, 2008)). 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 need to repeatedly lift heavy buckets of water. These findings have been corroborated during consultation with cleaning service providers.

While the benefits of using microfiber products are well known, new studies show that the laundering of microfibers can contribute to marine pollution. Indeed, microplastics are released during washing and current waste treatment systems have not been designed to catch them before they are released into the marine environment. Currently, the laundering of microfibre textiles (clothes, cleaning accessories, etc.) contributes up to 4% to the global releases of microplastics (Boucher & Friot, 2017). To limit this release, new projects have been put in place to find remedies although no widely-used solution is available on the market (e.g. (Life+ Mermaids project)). As such, it is proposed to restudy this issue in a future revision of the criteria.

No information regarding market availability and market penetration of microfiber cloths was found, with stakeholders providing varying opinions. 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 variability was due to contract length (there is a higher initial investment cost for good quality microfiber products and a company might prefer not to buy those for short contracts), area to be cleaned, etc. 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. A separate optional criterion (O3) is proposed to be introduced in order to

acknowledge that some companies do use a high amount of microfiber products and to offer more flexibility to potential applicants.

The scope of this criterion is restricted to microfiber products used during EU Ecolabel cleaning operations as they are widely available and are widely used. A stakeholder proposed including cloths and mops that have been awarded the EU Ecolabel or another EN ISO 14024 type I ecolabel within the scope that is nationally or regionally officially recognised in the Member States. Nevertheless, due to the still very low availability of such products, it is proposed to consider them separately in an optional criterion (O4) in order to reward companies that seek out and invest in such products.

5.1.4. Criterion M4: Staff training

Criterion M4: Staff training

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

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

Cleaning products:

— Staff shall be trained to use the correct product dosage for each cleaning task.

— Staff shall be trained to use the correct dilution rate for undiluted cleaning products and to use the appropriate dosage apparatus.

— Staff shall be trained on how to store cleaning products appropriately.

— The training shall cover the minimisation of the range of cleaning products used as a mean to minimise the risk of overusing and misusing the cleaning products.

Energy saving:

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

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

— Where appropriate, staff shall be trained to turn off lights when done with their tasks.

Water saving:

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

Waste:

— Staff shall be trained to use durable and reusable cleaning accessories and minimise the use of single use cleaning supplies (e.g. gloves), where this does not compromise staff safety and hygiene requirements.

— Staff shall be trained to correctly discard waste water.

— Staff shall receive specific training for waste management in order to help them fulfil the requirements set out in criterion M6 and criterion O7, where applicable. Training shall include solid waste management both at the company's premises and at the cleaning sites.

Health and safety:

— Staff shall be informed on health, safety and environmental issues related to cleaning tasks and encouraged to adopt best practices. This shall include information on:

- safety data sheets and handling of chemicals;

Criterion M4: Staff training

- ergonomics and applicable national occupational health and safety legislation;
- removal, cleaning and storage of reusable gloves (if applicable); and
- road safety and eco-driving (applicable to applicants having their own staff responsible for driving within the cleaning service provision).

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

Assessment and verification

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

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

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

Rationale of proposed criterion text

Cleaning company staff plays an important role in the delivery of cleaning service as their practices influence the final environmental footprint of the service. 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 and practices.

As different companies have different policies on training and there are different legislations throughout the EU28, the proposed criterion text has been developed to cover the basics of staff training that lead to environmental gains effectively, while still taking into consideration the differences in practices (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).

The proposed criterion requirements are similar to what can be found in other ecolabels. For example, the Nordic Swan criteria require applicants to have a training plan and provide training to their personnel that covers a certain number of topics. The Green Seal standard for commercial and institutional cleaning services requires all cleaning staff and procurement personnel to receive initial, cleaning site specific and continued (annually) training. Similarly,

Good Environmental Choice Australia requires all staff to be trained before they can start working and they must also receive continued training on at least an annual basis.

The areas proposed to be covered in the training requirements include the steps that can be taken to lower the environmental impact of cleaning. This includes the correct handling of cleaning products and cleaning equipment, energy saving measures, appropriate disposal of liquid and solid waste and basic health and safety issues. Throughout the development process, stakeholders have provided feedback on the topics to be covered and these have been updated with more details in the latest.

Moreover, stakeholders asked for precisions to be included on the schedule of the training. It is proposed to set requirements that all new staff, permanent and temporary, should be trained and the training must take place within six weeks of hiring. Moreover, an annual training update should also be provided. Some stakeholders highlighted that the original proposal of four weeks might be too short in some cases, while others stated that it was too long. As staff training is very important in ensuring that the environmental impacts of the cleaning are as low as possible, a compromise of six weeks is proposed.

Further, as training opportunities for cleaning companies and their staff are different throughout Europe, the criterion text specifies that the training can be done through an internal training programme or through external training.

Finally, the issue of exactly who should be trained needed to be addressed in the requirements as 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 members of staff who will participate and oversee EU Ecolabel cleaning operations are trained for each activity, in an approach similar to that taken by the Green Seal standard. The criterion wording has been amended with a clarification reflecting this.

5.1.5. Criterion M5: Basics of an environmental management system

Criterion M5: Basics of an environmental management system

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

- An *environmental policy* identifying the most relevant direct and indirect environmental impacts and the organisation's policy toward these impacts;
- A precise *action programme* ensuring that the company's environmental policy is applied to the services provided. The action programme shall also set targets for the environmental performance on the use of resources (e.g. reduction in cleaning products used) and actions to reduce the environmental impact. Setting targets and actions shall be supported by the collection of data on the use of resources and other environmental aspects (e.g. waste generation);
- An *internal evaluation process*, which shall take place each year to check the organisation's performance against the targets set out in the action programme. Results from the evaluation shall be used by the organisation's management board to continuously improve performance by updating the environmental policy and the action programme.

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

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

Assessment and verification

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

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

Rationale of proposed criterion text

The implementation of an Environmental Management Systems (EMS) helps improve resource efficiency and reduce overall environmental impacts. This criterion covers the basic requirements for such a system with the most important measures and practices listed therefore does not

require companies to have a certified or registered environmental management system, which could represent an important monetary burden to SMEs.

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.

Overall, stakeholders were generally favourable to this criterion as the basic pillars of an environmental management system provide potential for environmental improvement at the level of a whole organisation. During consultation, it was highlighted that the criterion text should define in detail the requirements for the basics of an EMS as it would help companies that do not have one already set up and that wish to apply for the EU Ecolabel. Moreover, the clarification of the requirements was deemed necessary to clearly differentiate between criterion M5 and O6 – the mandatory criterion has much simpler requirements that should be achievable by an SME that would like to highlight their commitment to lowering their environmental impacts.

5.1.6. Criterion M6: Solid waste sorting at the applicant's premises

Criterion M6: Solid waste sorting at the applicant's premises

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

The applicant shall provide the means for staff to sort solid waste generated at the applicant's premises into the appropriate waste stream categories, to be sent for treatment (e.g. recycling, incineration) or sent to be disposed of in accordance with local or national waste management practices and facilities.

Assessment and verification

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

Rationale of proposed criterion text

The handling of solid waste is a significant part of cleaning service operations, for example research performed by ADEME (2010) suggests that solid waste can account for up to 91% of the freshwater ecotoxicity impact related to cleaning services. The correct handling and processing can be easily put in place at the applicant's premises and is complementary to the requirements of Criteria M5 and O7.

Following stakeholder consultation, the issue of waste handling, sorting and disposal are proposed to be handled in two different criteria – one for the waste generated at the applicant's premises and one for the waste generated as part of the cleaning activities performed at the clients' sites. In this criterion, the applicant's premises are understood to be areas owned, managed or occupied by the applicant.

The limited online survey of cleaning companies showed that 93% of respondents already took steps to promote recycling and correct waste handling at their company's premises (Annex G) and this criterion helps ensure that all EU Ecolabel applicants consider the waste aspect. Some other ecolabelling schemes, such as Nordic Swan, also require that all waste generated by the cleaning company to be disposed of properly, both at their premises and at cleaning sites. Other schemes, such as Green Seal only requires waste stream separation for waste generated as part of cleaning operations, implying this should also occur at clients' premises, similarly to what can be found in Criterion O7.

Concerning the specific requirements set out, they are based on the existing approach taken in the EU Ecolabel for Tourist Accommodation that has a mandatory requirement on waste separation into categories for which the local or national authorities provide appropriate stream collection systems. This approach is suitable as there still is a difference in waste collection and disposal services throughout Europe even though Article 11 (1) of the Waste Framework

Directive⁷ requires Member States (MS) to separately collect at least paper, metal, plastic and glass by 2015. Indeed, 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 (BiPro, 2013) and by 2016 not all Member States met this target 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.

⁷ DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 November 2008 on waste and repealing certain Directives

5.1.7. Criterion M7: Information appearing on the EU Ecolabel

Criterion M7: Information appearing on the EU Ecolabel

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

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

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

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

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

Assessment and verification

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

Rationale of proposed criterion text

The EU Ecolabel Regulation states that each criteria document should establish three key environmental characteristics that may be displayed in the optional label with text box. For the Indoor Cleaning Services criteria, emphasis is proposed to be made on:

- products as using products with lower environmental impacts lowers the chemical load resulting from the cleaning services;
- staff training as the way staff performing their duties is clearly linked to the environmental performance of the services provided;
- the fact that the company has put in place an environmental management system, showing their commitment to bettering the overall environmental performance of the company.

To show that the company is accredited to provide EU Ecolabel services, a logo may be put on promotional material following the general guidelines for the EU Ecolabel logo use available on the indicated website. This portion of the criterion wording reflects the recent updates that were made in the criteria for Tourist Accommodations.

5.2. Optional criteria

5.2.1. Criterion 01: High use of cleaning products with low environmental impact (up to 3 points)

Criterion 01: High use of cleaning products with low environmental impact

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

The applicant shall earn points based on the percentage by volume at purchase of all cleaning products used per year, excluding wet wipes and other pre-moistened products, that have been awarded the EU Ecolabel for hard surface cleaning products or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States, as follows:

- At least 65%: 1 point
- At least 75%: 2 points
- At least 95%: 3 points

Assessment and verification

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

Rationale of proposed criterion text

The study of the cleaning operations performed by cleaning companies throughout Europe revealed that practices greatly differ from company to company. As such, several optional criteria have been added to highlight the efforts of companies that take steps towards more environmentally conscious practices, including the increased use of EU Ecolabel (or other nationally or regionally officially recognised in the Member States - EN ISO 14024 type I ecolabels) cleaning products. This criterion is complementary to Criterion M1, which sets mandatory requirements on the minimum environmental requirements for the cleaning products used by the company. The recognition of equivalency for other EN ISO 14024 type I ecolabels meets the specification laid down in Article 6(3) of EU Ecolabel Regulation 66/2010,

Stakeholder feedback gathered during and following the 1st and 2nd AHWG meetings was in favour of the inclusion of this criterion, as many companies do go beyond the minimum of 50% required in Criterion M1 but there might still be limited access in some parts of the EU28 for professional grade cleaning products. Three levels of ambition are proposed, with the aim of encouraging companies to opt for the higher options over time.

5.2.2. Criterion 02: Use of concentrated undiluted cleaning products (up to 3 points)

Criterion 02: Use of concentrated undiluted cleaning products

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

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

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

Assessment and verification

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

Rationale of proposed criterion text

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 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 towards 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.

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 initial proposal for this criterion required the use of products that have a minimum active content percentage of 30%, as can be found in the Italian Green Public Procurement requirements. However, some issues were identified with this definition as 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. Catalogue searches yielded only one company that claims to provide products fulfilling the Italian GPP requirement of 30% of active content (Arco, 2014), although this information could not be corroborated through SDSs or other non-promotional material.

Furthermore, discussions with cleaning product manufacturers also highlighted that 30% of active content is very ambitious and, to their knowledge, no or very few 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 5.

Table 5: Minimum dilution rates required by AISE's 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. 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. Following the input received from stakeholders, the dilution rate requested under Criterion O2 is proposed to be 1:100.

Interaction with Criterion M1

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, and considering the feedback received it is proposed that the percentage requirement for concentrated undiluted (dilution rate above 1:100) 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 O2. 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.

A stakeholder raised the issue of concentrated products being more likely to require CLP labelling and therefore special storage and safety precautions. Criterion M1(b) ensures that all products used within EU Ecolabel cleaning activities do not have an unreasonable impact on the environment and health and Criterion M4 on Staff Training requires staff to be trained in taking care to store products in a safe manner. Consultation of 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.

5.2.3. *Criterion O3: High use of microfiber products (up to 3 points)*

Criterion O3: High use of microfiber products

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

The applicant shall earn points based on the percentage of the textile cleaning accessories (e.g. cloths, mop heads) used per year that are made of microfiber, as follows:

- At least 65%: 1 point
- At least 75%: 2 points
- At least 95%: 3 points

Assessment and verification

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

Rationale of proposed criterion text

The use of microfiber products spreads more and more as they become more readily available and as companies realise that they allow the use of fewer chemicals and less water. In order to highlight companies that use a high percentage of microfiber products, this criterion has been introduced to complement Criterion M3.

Stakeholder feedback was in favour of the inclusion of this criterion, as many companies do go beyond the minimum of 50% required in Criterion M3 but in some cases this might not be possible due to cleaning site location, washing machine availability, etc.

5.2.4. *Criterion 04: Use of cleaning accessories with low environmental impact (up to 4 points)*

Criterion 04: Use of cleaning accessories with low environmental impact

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

04 (a) Mops (up to 2 points)

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

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

04 (b) Cloths (up to 2 points)

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

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

Assessment and verification

The applicant shall provide annual data (type and quantities of products) and documentation (including relevant invoices or site inventories) indicating the cleaning supplies and accessories used in the EU Ecolabel indoor cleaning service contracts. Where EU Ecolabel products are used, the applicant shall provide a copy of the EU Ecolabel certificate and/or packaging label showing that it was awarded in accordance with Commission Decision 2014/350/EU⁸. Where other ISO type I label products are used, the applicant shall provide a copy of the type I label certificate and/or packaging label.

Rationale of proposed criterion text

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 scope of this criterion has undergone multiple changes during the course of the project – at first, two different criteria tackled cleaning accessories (one dealt with recycled content and the

⁸Commission Decision 2014/350/EU of 5 June 2014 on establishing the ecological criteria for the award of the EU Ecolabel for textile products (OJ L 174, 13.6.2014, p. 45)

other with the use of more durable and reusable products). Following stakeholder feedback and a review of existing ecolabels for cleaning accessories, it is proposed to focus on textile cleaning accessories. Further information on products such as bin bags and gloves and why they are not taken into account in this criterion can be found in Section 3.3.

With regard to cloths and mops, all stakeholders agreed that a 70% threshold for EU Ecolabel/ISO type I label products was too high. Indeed, while the ECAT catalogue shows that there are 1,162 EU Ecolabel textile products available, it is not possible to say how many of these are textiles that can be used in the scope of cleaning services. Further review of online company catalogues shows that while EU Ecolabel mops and cloths are available, they appear to be geographically limited. Cloths and mops can also be ecolabelled under the "Supplies for microfiber based cleaning" Nordic Swan product group. As of 2015, close to 400 licences had been awarded for that product group, with the majority being located in Finland (204) and Sweden (133). Due to this limited availability and the fact that most companies will have to seek out ecolabelled cloths and mops if they want to use them in their cleaning activities, it is proposed to award points based on two threshold levels for each type of product (a maximum of 4 points can be achieved).

5.2.5. Criterion 05: Energy efficiency for vacuum cleaners (3 points)

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 to be launched in two stages (Label I and Label II). Label I, in force since September 2014, requires suppliers to label their products on the market with energy labels ranging from A to G. Label II, in force from September 2017 requires suppliers to place on the market products with energy labels ranging from A+++ to D. The energy labelling of vacuum cleaners is expected 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 after 2018.

Criterion 05: Energy efficiency for vacuum cleaners

Only vacuum cleaners covered by the scope of Commission Delegated Regulation (EU) No 665/2013⁹ are covered by this criterion. Exempted from the scope of that Regulation are wet, wet and dry, robots, industrial, central and battery operated vacuum cleaners and floor polishers and outdoor vacuum cleaners.

At least 40% of the vacuum cleaners (rounded up to the next integer) owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning services shall meet, at the time of purchase, at least the following energy efficiency classes as laid down in Delegated Regulation (EU) No 665/2013:

- Class A for vacuum cleaners bought before 01/09/2017;
- Class A+ for vacuum cleaners bought after 01/09/2017.

Assessment and verification

The applicant shall provide documentation demonstrating compliance with the energy class requirements (such as an invoice of vacuum purchase and a product fiche as set out in Annex III to Delegated Regulation (EU) No 665/2013, along with a full list of vacuum cleaners used in the provision of EU Ecolabel services.

Rationale of proposed criterion text

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 linked to 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).

⁹ Commission Delegated Regulation (EU) No 665/2013 of 3 May 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of vacuum cleaners (OJ L 192, 13.7.2013, p. 1).

In general, stakeholders were supportive of this criterion and some suggestions were made to make it easier to apply and closer to the practices of cleaning companies. Multiple stakeholders suggested that the criterion should only be applicable to new vacuums purchased during the validity period of the license but this type of requirement is not possible as points cannot be awarded to future purchases. Others stated that energy class A+ or higher should be requested but that is not possible as currently only energy classes A to G are available on the market. The main change requested was to the number of vacuum cleaners that should fulfil the energy requirements – it should not be a discreet number but rather a percentage of all the vacuum cleaners used in the provision of the services.

During the criteria development process, several stakeholders also expressed concerns regarding the technical aspects of the criterion. Indeed, it was suggested that the criterion should encourage the use of more efficient vacuum cleaners and that energy consumption alone is not an effective measurement unit of the efficiency of this type of machine. It was stated 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. As it was developed, 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) and contributes to the overall letter score indicated on the energy label.

In order to understand market availability of energy classes, market research was carried out for commercial vacuum cleaners during 2015. It showed that energy class A vacuums are already available from two of the largest producers of commercial vacuums (Table 6). Moreover, an analysis of the results showed that energy efficient Class A vacuums have, in general, comparatively better performance levels. Vacuums rated A have the same or better class of performance for carpet and hard floor cleaning, when compared with class B or less. Annex F provides further information on the overall performance for the different energy levels for vacuums by presenting the label characteristics for commercial vacuums rated C or lower for energy efficiency. As the new classes (A+ to A+++) came into force in September 2017, at the time of writing, no data was available on the exact distribution of vacuum cleaners within those new classes. They were nevertheless designed in a way that no vacuum cleaners available on the market should fall into the top class (A+++) and a very limited number into the second best (A++) at the start. Given the performance and availability of energy class A vacuum cleaners prior to that date, it is expected that A+ vacuum cleaners should be available within the last quarter of 2017 and early 2018.

Based on this information, the threshold requested for this criterion is proposed to be set at 40% of the vacuum cleaners used in the EU Ecolabel cleaning operations, either class A or A+, depending on the date of purchase. While many professional vacuum cleaners have a long lifetime, the stock of vacuum cleaners still must be renewed regularly. Moreover, given that energy efficiency label has already been on the market for over a year, the threshold of 40% is realistic.

Table 6: Characteristics of the energy label for several models of commercial vacuum cleaners, rated with A and B for energy class (Kärcher, 2015) and (Nilfisk, 2015)

	Kärcher						Nilfisk								
Type of vacuums:	Dry vacuums					Upright brush type 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 1074104

5.2.6. *Criterion 06: EMAS registration or ISO 14001 certification of the service provider (up to 5 points)*

Criterion 06: EMAS registration or ISO 14001 certification of service provider

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

Assessment and verification

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

Rationale of proposed criterion text

The implementation of an Environmental Management Systems (EMS) is a common requirement for good environmental management. A third-party certified EMS leads to worldwide (for ISO 14001) or European (for EMAS) recognition of the environmental efforts undertaken by a company. Following stakeholder feedback, this criterion is proposed to be optional as most cleaning companies are SMEs might consider that it is not in their business' best interest to invest in such a certification. Criterion 06 is an extension of Criterion M5.

Throughout Europe, 55 cleaning companies (classified with the NACE codes 81.21, 81.22 or 81.29) present in six countries have EMAS registrations, with Austria, Italy and Spain being in the lead (EC helpdesk, 2016). Segmented data for distinct sizes show that are 24 registrations for companies with 10-50 employees, 12 registrations for companies with 50-250 employees and 19 registrations for companies with more than 250 employees. No data specific to cleaning companies were available for ISO 14001 certificates, although it is known that ISO 14001 certificates have been issued (DG ENV, 2015) for all activity sectors.

5.2.7. *Criterion 07: Solid waste management at the cleaning sites (2 points)*

Criterion 07: Solid waste management at the cleaning sites

This criterion is only applicable where the applicant's clients provide the means for cleaning staff to sort waste into relevant solid waste streams and only to the solid waste generated during the EU Ecolabel indoor cleaning service provision (e.g. non-reusable packaging of cleaning products, packaging of consumable goods) and the solid waste pre-sorted (e.g. by the staff of the client) at the cleaning sites.

Cleaning staff shall sort the solid waste generated during the service provision and dispose of the sorted and pre-sorted waste in the appropriate containers inside or in the vicinity of the cleaning sites. This shall be done wherever the clients provide the means (e.g. waste containers for distinct solid waste streams) for the sorted waste streams to be sent for treatment (e.g. recycling, incineration) or sent to be disposed of in accordance with local or national waste management practices and facilities and/or relevant contracts with recycling services.

Assessment and verification

The applicant shall provide a declaration of compliance along with a description of the different solid waste streams accepted by the local authorities and/or relevant contracts with recycling services for each of the cleaning sites concerned.

Rationale of proposed criterion text

The 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 is complementary to Criterion M6 and aims to ensure that cleaning companies separate and dispose of relevant solid waste streams at the cleaning site premises as required by the local or national waste management facilities.

Following stakeholder feedback, the wording of the criterion has been updated to reflect in a clearer manner that it applies to the management of the waste at the clients' premises and only if the clients provide means to separate the waste streams (waste containers).

Most of the limited online survey respondents (82%, Annex G) confirmed that clients provide their staff with means to sort waste into relevant waste streams at the cleaning sites. Additional evidence (FEP, 2016) shows that from the 205 companies in France asked about their ability and willingness to separate waste (provided that clients supply the facilities to do so), about 25% responded that compliance is "possible and easy" and about 65% of the respondents considered it to be "difficult but possible". The reasoning for the responses was clarified together with the survey coordinators and amendments in wording were introduced to the criteria following the discussions.

5.2.8. *Criterion 08: Quality of the service (up to 3 points)*

Criterion 08: Quality of the service

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

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

The applicant shall put in place:

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

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

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

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

Assessment and verification

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

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

Rationale of proposed criterion text

Providing good quality of service is good practice in cleaning services but, because of the subjective and intangible nature of cleanliness, it is important to have procedures in place to monitor and improve quality. After the initial proposal for this criterion, two main issues were raised by stakeholders - the relevance of this criterion to the EU Ecolabel criteria set and the means of compliance by cleaning companies.

Concerning the relevance of a criterion on quality to the EU Ecolabel, it is important to remember that the quality of the services provided has a direct impact on the image and perception of an ecolabel:

- 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.
- 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 to meet the requirements of the agreement.
- The EU Ecolabel for Tourist Accommodation has an obligatory requirement on quality of the service provided by making available and collect general customer satisfaction with the facilities and services of the service provision. This information is used to feed in improvement action plans.

As many companies have nowadays integrated certified systems that merge requirements from ISO 9001 (for quality) with ISO 14001 (for environmental aspects), the criterion text was simplified in order to only refer to the quality of the service as the monitoring of the cleaning tasks, the improvement cleaning quality actions on the availability of detailed written work instructions for the cleaning staff.

As small companies maybe have the means of investing in a third-party certification scheme, it is proposed to have two levels of ambition for this criterion. The first simply lists the basic requirements for a quality management system and the second requires a third-party certification.

5.2.9. Criterion 09: Vehicle fleet owned or leased by the applicant (up to 5 points)

Criterion 09: 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 EU Ecolabel indoor cleaning service tasks covered by this criterion. The vehicles may include human-powered vehicles (cargo-bikes), human-powered vehicles with electric assist (e-cargo-bikes), light passenger or commercial vehicles used by managers, supervisors, cleaning staff, inspectors and any other person taking part in some aspect of the provision of the cleaning service.

Sub-criterion 09(a) also covers hybrid vehicles but not electric vehicles.

Sub-criterion 09(b) covers zero emission vehicles.

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

09 (a) Vehicles meeting European emission standards Euro 6 (1 point)

At least 50% of the vehicles (rounded up to the next integer) owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning service tasks shall meet the European emission standard Euro 6 for light passenger and commercial vehicles.

Assessment and verification

The applicant shall provide the relevant documentation showing which vehicles are used in the provision of the cleaning services, that they are owned or leased by the applicant, and shall indicate which vehicles meet the standard Euro 6. The vehicles' public registration can be used as proof of compliance, along with the certificate of conformity.

09 (b) Zero emission vehicles (2 points)

At least 10% of the vehicles (rounded up to the next integer) owned or leased by the applicant and used in the provision of the EU Ecolabel indoor cleaning service tasks shall be zero emission vehicles as determined by new European driving cycle (NEDC) tests as described in Regulation (EC) No 715/2007¹⁰, human-powered vehicles (cargo-bikes) or human-powered vehicles with electric assist (e-cargo-bikes).

Assessment and verification

The applicant shall provide the relevant documentation showing which vehicles are used in the provision of the EU Ecolabel indoor cleaning services, that they are owned or leased by the applicant, and shall indicate which vehicles are zero-emission. The vehicles' public registration can be used as proof of compliance, along with manufacturer documentation showing the NEDC test results.

¹⁰Commission Regulation (EC) No 692/2008 of 18 July 2008 implementing and amending Regulation (EC) No 715/2007 of the European Parliament and of the Council on type-approval of motor vehicles with respect to emissions from light passenger and commercial vehicles (Euro 5 and Euro 6) and on access to vehicle repair and maintenance information (OJ L 199, 28.7.2008, p. 1).

09 (c) Company transport plan (2 points)

The provider shall draw up a company transport plan to minimise fuel consumption, provide a target for fuel consumption reduction (per cleaning site) and have annual maintenance records for the vehicle fleet.

Assessment and verification

The applicant shall provide a copy of the company transport plan, the latest target for fuel consumption reduction and the annual fuel consumption evolution based on number of cleaning sites. The applicant shall provide a copy of the maintenance plan for the vehicle fleet. Vehicle service records may be used as proof of compliance.

Rationale of proposed criterion text

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.

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.

The requirements set out in the criteria have evolved throughout the project, to update requirements and also simplify the verification procedure linked to the criterion. Several possibilities were studied, including the promotion of "alternative low carbon intensity fuels" (fuels that have a lower carbon intensity than the conventional fossil fuel) and are mainly biofuels, such as bioethanol and biodiesel. However, stakeholders stated that the use of alternative low carbon intensity fuels would be hard to verify and their availability might greatly vary based on the location.

In order to make the criterion relevant and applicable, it refers to the Euro 6 standard, which 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. Essentially this criterion acknowledges companies that have invested in a newer fleet, which is more likely to be less polluting than older vehicles. To further push towards less emitting cars, it is proposed to also acknowledge companies that invest in zero-emission vehicles, such as electric cars and human-powered vehicles. Due to their still relatively low numbers on the EU market, it is proposed to set the threshold lower for zero-emission vehicles than for Euro 6 vehicles.

As for other criteria that cover products with long lifespan, there was a call from stakeholders to create a criterion that would only be applicable for all new purchases. Due to the structure of the EU Ecolabel scheme and the fact that this is an optional criterion, a licence cannot be awarded on the promise of good behaviour for future purchases.

Another sub-criterion does not specify which cars should make up a company's fleet but rather that the use of that fleet should be well thought out. 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.

5.2.10. *Criterion O10: Efficiency of laundry washing machines owned or leased by the applicant (up to 4 points)*

The following criterion cites Commission Delegated Regulation (EU) No 1061/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household washing machines and Commission Delegated Regulation (EU) No 1061/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household washing machines, either located at the applicant's or the client's premises. The Energy labelling and Ecodesign regulations for household washing machines are currently under revision and, at the time of writing, the revision is expected to be completed in 2017 and come into force in 2018. 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 the energy efficiency classes) and eco-design regulation (for the water consumption benchmarks).

Criterion O10: Efficiency of laundry washing machines owned or leased by the applicant

This criterion only applies to washing machines owned or leased by the applicant, either located at the applicant's premises or cleaning sites, to launder cloths, mops and staff uniforms used as part of the EU Ecolabel indoor cleaning service provision.

Sub-criterion O10(a) is only applicable if household washing machines are used that are covered by Commission Delegated Regulation (EU) No 1061/2010¹¹, as well as Commission Regulation (EU) No 1015/2010¹².

O10 (a) Energy label (up to 2 points)

The applicant shall earn points based on the percentage of the household washing machines (rounded up to the next integer) complying with EU Energy Label rated class A++ or A+++ for energy efficiency under Delegated Regulation (EU) No 1061/2010, as follows:

- At least 50% of A++ machines: 1 point
- At least 90% of A++ machines: 2 points
- At least 50% of A+++ machines: 2 points

O10 (b) Water efficiency (2 points)

Household machines: the water consumption of the household laundry washing machines, owned or leased by the applicant, shall be lower or equal to the benchmarks for water consumption set out in Annex IV to Regulation (EU) No 1015/2010. The benchmarks are measured according to EN 60456, using the standard washing cycle (60 °C cotton programme).

¹¹ Commission Delegated Regulation (EU) No 1061/2010 of 28 September 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of household washing machines (OJ L 314, 30.11.2010, p. 47).

¹² Commission Regulation (EU) No 1015/2010 of 10 November 2010 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for household washing machines (OJ L 293, 11.11.2010, p. 21).

Product sub-group	Water consumption: [litres/cycle]
Household washing machines with a rated capacity of 3 kg	39
Household washing machines with a rated capacity of 3,5 kg	39
Household washing machines with a rated capacity of 4,5 kg	40
Household washing machines with a rated capacity of 5 kg	39
Household washing machines with a rated capacity of 6 kg	37
Household washing machines with a rated capacity of 7 kg	43
Household washing machines with a rated capacity of 8 kg	56

AND

Commercial washing machines: the water consumption of commercial washing machines owned or leased by the applicant shall be lower than or equal to 7 L per kg of laundry washed.

Assessment and verification

The applicant shall provide annual data (list of all household washing machines owned and used to launder cloths, mops and staff uniforms used as part of the EU Ecolabel indoor cleaning service provision) and documentation indicating the energy efficiency class for the existing household laundry washing machines.

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

In the case that the documentation mentioned above is not available, compliance with criterion O10(b) may be shown by providing documentation on the total annual water consumption. In this case a total of 220 standard washing cycles per year shall be assumed.

Rationale of proposed criterion text

As many textile cleaning accessories are used and washed as part of cleaning services, this criterion focuses on encouraging applicants to improve the energy and water efficiency of their washing machines, either located at their own premises or at the cleaning sites.

Two types of machines can be used by cleaning companies – commercial or household machines. Due to the fact that currently the energy label has only been developed for household machines, the requirements set on energy are only established for those types of machines. The requirements set on water consumptions consider both types of machines.

In order to set the requirements for the energy classes to use, both the availability of washing machines in the different classes was studied as well as the lifespan of these types of goods. Indeed, while the majority of machines currently on the market are energy class A+++ (see

Preliminary Report), washing machines can last over 15 years (ENEA, 2007). While the aim of the criterion is to favour energy efficiency, it should not be done at the expense of a machine's lifespan. Indeed, further evidence was collected on the top energy classes' uptake of household laundry washing machines owned by cleaning service companies. Results showed that currently a very small number of SMEs own energy class A+++ (Annex G). Moreover, evidence was collected on the difference of the price between class A+++ and A++. Results show that the average 2014 price of washing machine sales is 498 euros for A+++ and 373 euros for A++. The difference in price together with the large lifespan of the machines may explain the smaller uptake of the top energy class for smaller companies (Topten, 2015). As such, three thresholds are proposed, one for A+++ machines and two different ambition levels for A++ machines.

In order to also consider commercial washing machines, it is proposed to also look at the water consumption of washing machines, as is done in the EU Ecolabel for Tourist Accommodation. A single benchmark is set for these machines, based on a functional unit (l/kg laundry washed) as there are no specific standard sizes – the machines are adjusted to the needs of the companies. For household washing machines, the benchmarks are those identified for best performers in the Ecodesign Commission Regulation (EU) No 1015/2010 for the domestic laundry washing machines.

5.2.11. *Criterion 011: Ecolabelled services and other ecolabelled products (up to 5 points)*

Criterion 011: Ecolabelled services and other ecolabelled products

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

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

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

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

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

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

Assessment and verification

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

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

Rationale of proposed criterion text

Some products and services that can be used to support the delivery of indoor cleaning 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. As the availability of such products and especially services is low in a number of member states, it is proposed this criterion is part of the point system.

Currently only two services have been identified that are used to assist in the everyday running of cleaning services and have been awarded with an ISO type I label – laundry services and car washes. As there might be other services appearing later on the market, the wording of the criterion does not specify that those are the only two options. To recognise that their availability is very low and geographically limited, the number of points proposed to be awarded is relatively high for each service outsourced (with a maximum of two such services per licence), even though the total environmental gain might be limited.

For ecolabelled products, as there is a large number of product groups covered by the EU Ecolabel and other ISO type I labels and that could be used to assist in the provision of cleaning services, they are not all listed in the criteria. A more exhaustive list will be added to the User Manual in order to aid both the applicants and Competent Bodies. Among others, stakeholders propose to include different detergents (e.g. laundry detergents for uniform and textile accessory cleaning, hand dishwashing detergents for kitchen space washing up), textiles (uniforms) and paper products (copying and graphic paper, printed paper).

5.2.12. *Criterion 012: Consumable goods and electric hand air-dryers supplied to the client (up to 3 points)*

Criterion 012: Consumable goods and electric hand air-dryers supplied to the client

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

012 (a) Hand Soaps (1 point)

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

012 (b) Paper goods (1 point)

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

012 (c) Textile towel rolls (1 point)

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

012 (d) Electric hand dryers (1 point)

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

Assessment and verification

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

¹³Commission Decision 2014/893/EU of 9 December 2014 establishing the ecological criteria for the award of the EU Ecolabel for rinse-off cosmetic products (OJ L 354, 11.12.2014, p. 47).

¹⁴ Commission Decision 2009/568/EC of 9 July 2009 on establishing the ecological criteria for the award of the Community Eco-label for tissue paper (OJ L 197, 29.7.2009, p. 87).

accordance with:

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

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

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

Rationale of proposed criterion text

Consumable goods are not used by cleaning companies as part of their cleaning activities but, in some cases, they can be procured and supplied by these companies on behalf of their clients as part of contracts. The consumer goods covered under this criterion include the most commonly procured products (hand soap, toilet paper and hand drying methods). In the case of hand drying methods, the requirements have gone through multiple iterations in order to avoid putting an undue burden on a specific type of products and causing companies to switch from one type of product (e.g. paper towels) to another (e.g. textile towel rolls) in order to more easily comply with the criterion. To avoid misinterpretation of the criterion, a sentence is included specifying that this criterion is only applicable if the applicant is responsible for supplying consumable goods in at least one contract. The percentages indicated in the requirements should be calculated based on all the contracts where the cleaning company purchases consumable goods on behalf of their clients. The maximum number of points that can be obtained through this criterion reflect the fact that essentially there are three types of consumable goods covered – for hand washing, hand drying and hygienic purposes.

This criterion is proposed as part of the optional criteria as stakeholder feedback highlighted that for some contracts the clients choose the exact type/brand of consumables to be provided without leaving the applicant any room for negotiations and/or bringing their own proposal. A mandatory criterion would de facto exclude those companies from applying for the EU Ecolabel. While the argument was made that companies that contract EU Ecolabel services would always opt to use ecolabelled products (EU Ecolabel or other ISO type I label) in their sanitary facilities, ecolabelled products may not be available equally for all product groups throughout Europe. Moreover it was suggested that cleaning companies may be able to influence the choices of the clients when it comes to consumable goods – this point, nevertheless, was never proven and cleaning company interviews highlighted that micro-companies and SMEs did not feel confident in their ability to any significant influence.

Throughout the criteria development process the required thresholds have been amended to reflect product market availability. Indeed, EU Ecolabel or other ISO type I label paper products represent some of the most available types of ecolabelled products on the European market, with nearly 6,000 products being present in the ECAT catalogue and many more available through ecolabels such as Nordic Swan and Blue Angel. For soaps, there are 649 products currently holding the EU Ecolabel for Soaps and Shampoos listed in ECAT (September 2016) with licensed products available in all EU28 countries but with the number of licenses varying significantly from country to country and it is impossible to know how many of those licenced products are hand soaps that could and would be used by applicants' clients. Textile hand towel

rolls can be ecolabelled under the textiles product group for both the EU Ecolabel and Nordic Swan. Based on ECAT data (September 2015), there are 2501 textile products with an EU Ecolabel license, however, it is not possible to understand how many of these are textile towel rolls. However, for fabric towels there are other ecolabels that consider "fabric towels in towel dispensers" over the complete product lifecycle. Various aspects regarding, for instance, the textile roll specifications, minimum period of use before disposal/recycling, processing in laundries (detergents, water consumption) and logistics are taken into consideration in these labelling schemes (e.g. Blue Angel RAL UZ 77 "Fabric Towels Supplied in Towel Dispensers") (European Textile Services Association, 2016). Thus, the information on product availability is limited but, as this is an optional criterion, companies interested in the EU Ecolabel for the cleaning services they provide can focus on other criteria if they feel that their clients would not be interested in ecolabelled consumable goods or if the market availability of those goods in their region is low.

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7. ANNEXES

7.1. 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 1.3.2.9 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 1.2.2). 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 simultaneously provide
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. 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>EU Ecolabel and non-EU Ecolabel services.</p> <p>See Section 1.2.2 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 1.2.3 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. 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</p>

General	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?	also be developed later on with tables that are easy to fill in and that help with calculations.
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.
General	Envisage the flexibility of points system, in addition to mandatory requirements.	See Section 1.2.4 for a detailed description of the proposal, how the difference was made between mandatory and optional criteria and how the points were assigned.
General	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 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.	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.
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 1.2.1.
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 1.2.1.
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 1.2.1 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 1.2.1 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

		<p>require routine disinfection are proposed to be included within the scope of the product group.</p> <p>See Section 1.2.1 for more details.</p>
Product Group definition and scope	Schools are not 'commercial' buildings	<p>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.</p> <p>See Section 1.2.1 for more details.</p>
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.	<p>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).</p> <p>See Section 1.2.1 for more details.</p>
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.	<p>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.</p> <p>See Section 1.2.1 for more details.</p>
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,...)	<p>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.</p> <p>See Section 1.2.2 for more details.</p>

<p>Criteria area 3.2 Cleaning operations/power equipment</p>	<p>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.</p>	<p>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).</p>
<p>Criterion 1 from the 1st Technical Report has been renamed Criterion M1: Use of cleaning products with lower environmental impact</p> <p>(see Section 1.3.1.1 for rationale)</p>		
<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 O9: 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 environmental impacts</p> <p>Scope</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 special product? In this case, is this customer is inside or outside the scope?</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 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>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>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>Criterion 1 - Use of cleaning products with lower environmental impacts</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>

Remark		
Criterion 1 - Use of cleaning products with lower environmental impacts	The proposed threshold seems too high, even if the offer on the French market is quite wide.	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 1.3.1.1). If a points system is introduced, other, higher, thresholds may be put in place.
Threshold	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.	
	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.	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.
	Yes it is feasible [a threshold of 70%], but only considering the general purpose cleaners used in routine cleaning services.	
	We support the 70% level in the requirement.	
Criterion 1 - Use of cleaning products with lower environmental impacts	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?	Comment accepted: Data related the listed questions have been provided in Section 1.3.1.1. 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.
Market availability		
Criterion 1 - Use of cleaning products with lower environmental impacts	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: How many of them are meant for professional use?	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 information has been added to the report.
Market availability		
Criterion 1 - Use of cleaning products with lower environmental	The Ecolabel standard certificates only products for ordinary cleaning (such as window cleaners, all purpose cleaners, laundry detergents, dishwasher detergents, hand dishwasher detergents). It doesn't allow	Comments partially accepted: The threshold for ecolabelled products is proposed to be lowered, in order for applicants to have more flexibility

<p>impacts</p> <p>Professional products on the market</p>	<p>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>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 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</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>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>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 1.3.1.1). 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</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 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.</p>	<p>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>
<p>Criterion 1 - Use of cleaning products with lower environmental impacts</p>	<p>Criterion 1: Use of cleaning products with lower environmental impact We agree with this criterion.</p>	<p>Comment accepted.</p>
<p>Criterion 2 from the 1st Technical Report has been renamed Criterion O2: Use of cleaning accessories with lower environmental impact (see Section 1.3.2.2 for rationale) and all consumable goods are now covered by Criterion M4: Consumable goods.</p>		
<p>Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact</p>	<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.</p> <p>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.</p>	<p>Comments accepted: for conThe levels set for the thresholds are proposed to be identical and lowered.</p>

	<p>In Finland, the Swan label is the 5th recognized trademark.</p> <p>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 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> <hr/> <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>	
<p>Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact</p>	<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	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.	Comment acknowledged. For consumable goods in the EU GPP criteria, please consult the EU GPP report.
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	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.	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.
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>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>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 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>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>	
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<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>
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<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>
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<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 dryers meet the relevant requirements. This is particularly relevant as any ecolabel is required to include health and</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>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>Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact</p>	<p>We also notice that the criterion does not mention hot and/or jet air dryers.</p> <hr/> <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> <hr/> <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</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 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 1.3.1.4 (Criterion M4: Consumable goods) for further details.</p>

	textiles.	
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	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	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. See 1.3.2.2 for further details.
Criterion 2 - Use of cleaning supplies and accessories with lower environmental impact	<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 1.3.2.1 for rationale)</p>		
<p>Criterion 3 - Cleaning product concentration at purchase</p> <p>Availability of</p>	Yes it is feasible but probably we will not find a lot ecolabelled cleaning products.	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 (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

ecolabelled products		market.
Criterion 3 - Cleaning product concentration at purchase	<p>According to this criterion, “at least (...) % by volume of all cleaning products purchased shall be concentrated with at least 30% of active substance”.</p> <p>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>
Criterion 3 - Cleaning product concentration at purchase	<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>
Criterion 3 - Cleaning product concentration at purchase	<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>
Criterion 3 - Cleaning product concentration at purchase	<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>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> <p>How should we calculate?</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 concept to understand and calculate.</p>
<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>	<p>Comments accepted: This revision proposes for the criterion to be optional (part of the point system).</p>
<p>Criterion 3 - Cleaning product concentration at purchase</p>	<p>Criterion 3: Cleaning product concentration at purchase We agree on this criterion.</p>	<p>Comment accepted.</p>
<p>Criterion 4 from the 1st Technical Report is proposed to be removed in this report</p> <p>(see Section 1.1.3 for rationale)</p>		
<p>Criterion 4 - Recycled content in disposable cleaning supplies</p> <p>Consumable goods</p>	<p>We advise to procure the consumables separate to cut cost and make a better deal.</p>	<p>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>
<p>Criterion 4 - Recycled content in disposable</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</p>	<p>Comments accepted: As part of the revision work, the possibility of</p>

cleaning supplies	bags.	
Recycled content and ecolabels	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.	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).
	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.	See Section 1.3.2.2 (Criterion O2: Use of cleaning accessories with lower environmental impact) for a discussion on bin bags and recycled content in products.
	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.	
	We would like to mention the existence of NF ENVIRONMENT MARK (French ecolabel) - WASTE SACKS	
	We agree with this approach for some plastic products that are broadly available in market as trash bags.	
	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.	
	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.	
	It is better to develop 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>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 O2: 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 1.1.3 for rationale)</p>		

Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies	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.	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.
Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies Scope and Definition	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.	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 cloths and mops are concerned.
	We don't understand which kind of things are meant with this criterion.	
	There is no possibility how to categorize these products or how to prove compliance with this criterion. This criterion is therefore not applicable.	
	No comments on it until we have more information about.	
Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies	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.	
Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies	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).	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.
Criterion 5 - Purchase of more durable and reusable cleaning accessories and supplies Health and safety	Proposed addition to the criteria: 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. Rationale: The Ecolabel regulations require the criteria to take into consideration- "Net environmental balance between the environmental benefits and bur-	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.

dens, including health and safety aspects”

There is significant body of evidence that shows risks if proper cleaning and hygiene procedures are not observed.

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

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 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/111e68ea0824afe1802575070003f039/5C199930F8EF1B49802579A70045ECAB/\\$File/Role%20of%20hygiene%20in%20reducing%20the%20risk%20of%20infection_17022012.pdf](http://www.ifh-homehygiene.org/IntegratedCRD.nsf/111e68ea0824afe1802575070003f039/5C199930F8EF1B49802579A70045ECAB/$File/Role%20of%20hygiene%20in%20reducing%20the%20risk%20of%20infection_17022012.pdf)

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

iii
<http://www.efsa.europa.eu/en/corporate/doc/factsheetfoodbornezoonoses.pdf>

<http://www.efsa.europa.eu/en/efsajournal/pub/2597.htm>

iv <http://www.nhs.uk/Livewell/homehygiene/Pages/prevent-germs-from-spreading.aspx>

[i] [http://www.ifh-homehygiene.org/IntegratedCRD.nsf/111e68ea0824afe1802575070003f039/5C199930F8EF1B49802579A70045ECAB/\\$File/Role%20of%20hygiene%20in%20reducing%20the%20risk%20of%20infection_17022012.p](http://www.ifh-homehygiene.org/IntegratedCRD.nsf/111e68ea0824afe1802575070003f039/5C199930F8EF1B49802579A70045ECAB/$File/Role%20of%20hygiene%20in%20reducing%20the%20risk%20of%20infection_17022012.p)

	<p>df</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>Textiles</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>
<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>

Criterion 6 from the 1st Technical Report has been renamed Criterion M3: Use of microfiber products (see Section 1.3.1.3 for rationale)		
<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 1.3.1.3.</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</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>this approach neither how to categorize these products nor how to prove compliance with this requirement.</p>	
<p>Criterion 7 from the 1st Technical Report has been renamed Criterion M2: Cleaning product dosage (see Section 1.3.1.2 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 staff. 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 1.3.1.2) 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> <hr/> <p>More emphasis should be placed on the adequacy of staff training to ensure overdosing does not occur.</p> <hr/> <p>It would be important to include cleaning product dosage in the workers training.</p>	<p>Comments accepted: Criterion M5: Staff training is proposed to cover the issue of correct dosing.</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 1.3.2.8 and 1.3.2.9 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> <hr/> <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>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>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</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</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</p>

<p>(laundry services)</p> <p>Scope</p>	<p>the contract matter and is therefore not applicable.</p> <p>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.</p>	<p>subject matter and here the laundering of accessories does help ensure that the cleaning services delivered are of high quality and are part of the environmental hotspots that are associated with cleaning services.</p>
<p>Criterion 8 - Efficiency in activities related with cleaning services (laundry services)</p> <p>Professional machines</p>	<p>Sub-criterion 8b: What if they buy a professional machine? No requirements apply? This could be in favour of the large companies.</p> <p>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.</p>	<p>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 1.3.2.8) due to the fact that they vary greatly based on their intended use.</p>
<p>Criterion 8 - Efficiency in activities related with cleaning services (laundry services)</p> <p>Energy labelling</p>	<p>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.</p>	<p>Comment accepted: Energy labelling is proposed to be part of the requirement for Criterion 08: Efficiency of laundry washing machines owned by the applicant.</p>
<p>Criterion 8 - Efficiency in activities related with cleaning services (laundry services)</p> <p>Availability of laundry services</p>	<p>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</p> <p>Please note that there is no ecolabel in France for laundry services, and no laundry services are certified according to Nordic Swan in France.</p> <p>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.</p> <p>Criterion 8: Efficiency in activities related with cleaning services (laundry services)</p> <p>We propose to delete this criterion or make it optional.</p>	<p>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.</p>

	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	
Criterion 8 - Efficiency in activities related with cleaning services (laundry services) Laundry detergents	If laundry machines can be part of a criterion, then using EU Ecolabel laundry detergent should be part of a criterion as well. 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.	Comments accepted: Laundry detergents are part of the scope of Criterion 09: Outsourced auxiliary services and products. Concerning I&I products, these are 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).
Criterion 8 - Efficiency in activities related with cleaning services (laundry services) Energy use	Is the impact of the energy-consumption relevant enough to set a criterion?	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.
Criterion 9 from the 1st Technical Report has been removed and the contents incorporated in Criterion M5: Staff training (see Section 1.3.1.2 for rationale)		
Criterion 9 - Room temperature water in cleaning product dilution Already part of normal practices	This criterion seems reasonable. In Sweden cold water is normally used in cleaning product dilution by the staff This criterion is not applicable, as only cold or room temperature water is used for cleaning product dilution. The demand for the use of cold or room temperature water is recommended by all manufacturers in the area of industrial surface cleaning. Criterion 9: Room temperature water in cleaning product dilution We agree on this criterion. The recommended dosage of the cleaning	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.

	products that make manufacturers is based on room temperature water.	
<p>Criterion 9 - Room temperature water in cleaning product dilution</p> <p>Part of training</p>	This requirement shall rather be integrated into the criterion dealing with training	<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>
	This could be part of the staff training	
	This could be part of the training the staff has to follow	
	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.	
<p>Criterion 10 from the 1st Technical Report has been renamed Criterion O3: Energy efficiency for vacuum cleaners</p> <p>(see Section 1.3.2.3 for rationale)</p>		
<p>Criterion 10 - Energy efficiency for vacuum cleaners</p>	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.	<p>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.</p>
	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?	
<p>Criterion 10 - Energy efficiency for vacuum cleaners</p>	[Anthesis note] Comment provided as direct amendment of original report text. Please refer to the relevant document	<p>Comment acknowledged.</p>
<p>Criterion 10 - Energy efficiency for vacuum cleaners</p> <p>Scope</p>	Domestic Vacuum cleaners are being referred to here - why? In most situations industrial cleaners are likely to be used.	<p>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.</p>

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.
Criterion 10 - Energy efficiency for vacuum cleaners Remark	Criterion 10: Energy efficiency for vacuum cleaners No comments on it.	Comment acknowledged.
Criterion 10 - Energy efficiency for vacuum cleaners Environmental impact	Is this a relevant environmental impact?	Comment acknowledged: Yes, energy use from machinery has been highlighted in LCAs related to cleaning services (see introduction to Section 1.3.2.3 for references).
	Is this a relevant environmental impact? Important enough to set a criterion?	
Criterion 11 from the 1st Technical Report has been removed (see Section 1.1.3 for rationale)		
Criterion 11 - Staff uniforms Dry cleaning	Furthermore, uniforms should not require dry cleaning as this cleaning process uses much more hazardous chemicals and is much less environmental friendly.	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.
Criterion 11 - Staff uniforms	Could be a points requirement	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

Point criterion	<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>	uniforms is still very low throughout EU28 and thus it is proposed to remove this criterion.
<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>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>	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>Criterion 11 - Staff uniforms</p> <p>Other verification labels</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).	Comment accepted: Such an approach can be studied in more detail in a future revision if the market availability of ecolabelled uniforms increases.
Criterion 12 from the 1st Technical Report has been renamed Criterion 07: Vehicle fleet owned or leased by the applicant		

(see Section 1.3.2.7 for rationale)		
<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> <hr/> <p>Sub-criterion 12c: This criterion is very unclear so it's very difficult to comment on this.</p>	<p>Comments accepted: The criterion wording has been updated in order to be more specific about the cars in scope (see Section 1.3.2.7).</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 1.3.2.7)</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 1.2.2. 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>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>

Verification		
Criterion 12 - Air emissions and fuel use associated with road transport Point system	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.	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.
Criterion 12 - Air emissions and fuel use associated with road transport Transport plan	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)	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.
Criterion 12 - Air emissions and fuel use associated with road transport Remark	We have good experience from the Nordic swan criterion on transportation. Would support a copy of their requirement	Comment accepted.
Criterion 12 - Air emissions and fuel use associated with road transport Non-criterion	Sub-criterion 12a: All new purchased vehicles will apply anyway, this is mandatory Sub-criterion 12b: The requirements is not very ambitious, this is just the average a car constructor has to sell To spend less energy and reduce pollution, eco-mobility should be encouraged (sharing of cars, mix of transportation modes, using the numeric to organize ...). The thresholds for carbon emissions are not ambitious. Please see the car labelling made by ADEME:	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 should already be met by all new cars put on the market.

	http://carlabelling.ademe.fr/index/	
<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</p> <p>(see Section 1.3.1.5 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>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).</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>

<p>Criterion 13 - Staff training</p> <p>Scope/applicant scope</p>	<p>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).</p>	<p>Comments accepted: A text specifying that the EU Ecolabel should be awarded on a service-line basis has been added in Section 1.2.2. Moreover, the criterion wording has been updated to indicate that cleaning staff and overseeing managers should follow the training.</p>
<p>Criterion 13 - Staff training</p> <p>Nation training standards</p>	<p>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.</p> <p>In France, Vocational qualification certificate (certificat de qualification professionnelle CQP) in the cleaning activities sector do exist.</p>	<p>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.</p>
<p>Criterion 13 - Staff training</p> <p>Topics to be covered</p>	<p>If “Health & Safety” has to be considered, other aspects shall not be forgotten, such as:</p> <ul style="list-style-type: none"> - Road traffic injury prevention. - Prevention of work-related muscular-skeletal disorders (employee training in working gestures and posture and the ergonomics of workstations). <p>Ergonomics could be part of the "health and safety"</p> <p>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.</p> <p>Source segregation of waste and appropriate segregation of hazardous waste or waste with hygiene risks should be included in the training.</p> <p>(...) 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>(...) the use of microfibers.</p> <p>Staff training concerning this issue could be an added value.</p>	<p>Comments accepted: The list of topics that should be covered has been updated.</p>

	(...) 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 Criterion 13: Staff training We agree with this criterion.	Comments accepted.
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 1.3.1.7 and 1.3.2.4 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	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

measures and practices SMEs	This could be very difficult for small companies with limited resources	in order not to exclude small companies.
Criterion 14 - Environmental measures and practices Redundant/cost increase	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. This criterion is redundant and furthermore not feasible and unacceptable, as this would impose an immense additional requirement, which again massively increases the costs.	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.
Criterion 14 - Environmental measures and practices Remark	Criterion 14: Environmental management measures and practices We agree with this criterion.	
Criterion 15 from the 1st Technical Report has been removed and is now partially part of Criterion M5: Staff training (see Section 1.1.3 for rationale)		
Criterion 15 - Waste water discharge Training	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. Criterion 15: Waste water discharge We think that it would be enough include it into the personal training.	Comments accepted: It is proposed that correct waste water discharge becomes a topic to be covered in Criterion M5: Staff training.
Criterion 15 - Waste water discharge Remark	This criterion is not needed	
Criterion 15 - Waste	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	Comments accepted: As stated in the comments, where the waste water should be discarded largely depends on the client but it is

<p>water discharge</p> <p>Largely up to the client/available facilities</p>	<p>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>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.</p>	<p>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>
<p>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 05: Solid waste sorting and disposal at the cleaning sites</p> <p>(see Sections 1.3.1.8 and 1.3.2.5 for rationale)</p>		
<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>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 We think that it would be enough to include it into the workers training.</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>

	We agree with this criterion. This subject will be managed as established in the environmental management system of the public administration.	
Criterion 17 from the 1st Technical Report has been renamed Criterion M6: Wage policy (see Section 1.3.1.6 for rationale)		
Criterion 17 - Wage policy Many national wage regulations	<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>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 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.</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.
Criterion 17 - Wage policy Countries without national wage regulations	<p>In Sweden we don't have any minimum wage regulation so this criterion does not work in Sweden.</p> <p>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.</p>	Comment acknowledged: The proposed criterion is to be discussed for countries like Sweden in the 2 nd AHWG meeting.
Criterion 17 - Wage policy Verification	<p>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.</p> <p>This is an important criterion, but how to check? Do Competent Bodies and/or auditors have the authority to check the payslips ((data protection)</p>	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>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.</p>	
	<p>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.</p>	
	<p>While we strongly support compliance with national minimum sector wages, we do not see how this compliance can be controlled in practice.</p>	
<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> <hr/> <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> <hr/> <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>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 18 from the 1st Technical Report has been removed</p> <p>(see Section 1.1.3 for rationale)</p>		

Criterion 18 - Labour standards Remark	BEUC and EEB fully support this criterion.	Comment accepted.
Criterion 18 - Labour standards Remark	["shall be observed by all cleaning service providers."] This is repetition and can be deleted	Comment accepted.
Criterion 18 - Labour standards Not relevant/ Alternatives	<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>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 done out of Europe, these standards are not at all relevant for cleaning services, as they are provided inside Europe.</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.
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	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	Comments partially rejected: Article 6(e) of the EU Ecolabel Regulation allows the EU Ecolabel scheme to cover social aspects if they

standards	verifies this criterion.	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.
	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.	
	We disagree with this approach since the current European Ecolabel Regulation does not regulate social criteria. We propose to delete this criterion.	

7.2. Annex B: Stakeholder feedback following 2nd 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
Product Group definition and scope – Window cleaning	"The wage of a professional window cleaners and general cleaners are different."	Comments partially accepted: Reference is now made to "glass" instead of "windows" as the main targeted areas are indoor glass panes and this should avoid possible misunderstandings.
	The term "window cleaning" is misleading. While indoor glass is covered by regular office cleaning, outdoor glass or window cleaning is not. Indeed, window and outdoor glass cleaning is done with special devices and cleaning agents are in a different (higher) wage group than office cleaners. Furthermore, window cleaning is generally only provided two times per year, so there is very little impact on the environment. This clearly demonstrates that including "window areas that can be accessed without the use of any specialised equipment or machines" does not reflect the reality and is therefore not at all feasible. We therefore demand to exclude "window cleaning" from the scope.	
	<p>Although there was a proposal at Brussels' meeting about taking this task (glass/window cleaning) out of the scope of the project, I consider it should be kept.</p> <p>According to my company's experience and the experience from the companies in my geographic area, this task can be done by the same staff that performs the other tasks (sanitary cleaning, surface cleaning...), specifically when it is performed indoors, from the floor and without additional equipment. With the techniques that we currently have, glass/window cleaning (as it is defined in the scope) can be considered as any other surface cleaning.</p>	

Product Group definition and scope – Hospitals	The term “publically accessible hospital areas” is not clear. Does the patient room fall under this definition? How can a cleaning company differentiate between publically accessible and non-publically accessible hospital areas. This might be different in the EU Member States. In order to avoid misunderstanding “hospitals” have to be excluded from the scope.	Comment acknowledged. The main differentiating factor is expected to be the fact that certain areas of hospitals require routine disinfection, which is not covered by the proposed scope. These parts of hospitals generally have restricted access and are not "publically accessible".
Product Group definition and scope – Domestic residences	The term “domestic residences” is nowhere defined. During the 2nd AHWG meeting on 22 October 2015 representatives from the Technical Institute in Seville just explained that these are “homes not only for the elderly”. This term is not at all definite and needs to be precisely defined, as the boundaries to other similar activities are not at all clear.	Comment partially accepted. The wording used in the scope has been changed to "private residences" in order to make it clearer. Indeed all private homes and other private buildings are proposed to fall within the scope of this EU Ecolabel. Moreover, a definition is also provided in the "Terms and definitions" section.
Scope of the applicant - "separate profit centre"	It's unclear if it's allowed that a company provides "normal general cleaning" and "EU Ecolabeled general cleaning". As it is written now it seems that they can provide both as long as they have 2 separate profit centres.	Comment acknowledged. That is indeed the case - as long as the accounting is separate, a company can provide any other type of cleaning services besides EU Ecolabel cleaning services.
Separate profit centre	The terms “separate financial profit centre” and “service line” are not at all clear. It is of utmost importance that the Ecolabel for cleaning services is only awarded on a contract-basis and not to the entire cleaning company. This is the only possible way to exactly verify compliance with the criteria. This view is also supported by the chosen title “indoor cleaning services”. It can only be interpreted in the way that any eventual label treating “indoor cleaning services” is awarded to the provision of a specific cleaning service carried out for a specific contract. This has to be kept in mind throughout all criteria and especially when setting specific thresholds or percentages.	Comment acknowledged. The EU Ecolabel cannot be awarded to a contract before it has been signed and as such it cannot be awarded on a contract-basis.
Separate profit centre	The whole service line in a company is much broader than a “separate profit centre”. This would mean that all resources have to be assessed under the Ecolabel criteria although only a small part of the services provided in the service line will fall under the scope. This goes against the practice of the cleaning sector and would lead to complete restructuring of cleaning companies.	Comment partially accepted. The survey of practices of cleaning companies in Europe showed that the handling of resources and accounting is done in different ways, with some keeping separate accounts and some not. Indeed, the wording that is proposed is one option that is used by some companies and facilitates assessment and verification – at the time of writing, it was not possible to find a solution that would be verifiable and would fit all practices.

<p>Awarding of EU Ecolabel</p>	<p>"SCOPE</p> <p>With reference to the scope, bearing in mind that:</p> <p>a) according to Ecolabel Regulation the EU Ecolabel can be awarded to products or services (Article 2 – Scope "1. This Regulation shall apply to any goods or services which are supplied for");</p> <p>b) in the case of products, the applicant may produce or sell either EU Ecolabelled or non-EU Ecolabelled products;</p> <p>c) the main differences between campsite and the tourist accommodation services and cleaning service are the following:</p> <ul style="list-style-type: none"> - a cleaning service is carried out at the client' site/s, not in a site managed by the applicant; therefore no criteria can be defined with reference to the site/s, - a cleaning service can't exist without a contract has been entered into. <p>The contract documents provided by the buyer describe products, means and methods that must be used/implemented so that in most cases the service provider is not free to choose the way to carry out the service and which products have to be used,"</p> <p>"A. the EU Ecolabel should be awarded to a company without any changes in the EU Ecolabel Regulation.</p> <p>In this case EU Ecolabel criteria should necessarily include criteria concerning the environmental management system of the whole company.</p> <p>The EU Ecolabel should be awarded to the whole part of the company providing cleaning services.</p> <p>The company should:</p> <ul style="list-style-type: none"> - respect the EU Ecolabel criteria in all the cleaning services underway at the time of the application, 	<p>Comment partially accepted. The aim is to award this EU Ecolabel under the current EU Ecolabel Regulation.</p>
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	<p>- pledge to inform in due time the CB about any new contract/service,</p> <p>- pledge to provide only EU Ecolabel cleaning services.</p> <p>Following the application all services underway have to be assessed and verified, and periodic assessment and verification should be carried out by the CB for each service. Sample checks might be considered.</p> <p>NOTE: the draft criteria defined by JRC appear to correspond to the above described situation A</p> <p>B. the EU Ecolabel should not be awarded to a company without previous changes in the EU Ecolabel Regulation.</p> <p>As a consequence the EU Ecolabel should be only awarded to specific cleaning services each of them referring to a specific contract in force.</p> <p>The application might be submitted to the CB before the contract has been entered into but the EU Ecolabel shouldn't be awarded before the service is really in place and an on-site visit has been carried out.</p> <p>NOTE: the proposed changes in the draft criteria refer to situation B. As a consequence hereinafter the word service indicates "a specific service provided under a specific contract".</p> <p>None of the above should be acceptable, the draft EU Ecolabel criteria for cleaning services could be moved to the GPP working group."</p>	
General comments	<p>"Add rental services to introduction, as this is commonly used by cleaning companies as an alternative to buying and ownership of products."</p> <p>(Add following text after goods: (either ownership or rental))</p>	<p>Comment rejected. The ownership of products/goods is not mentioned specifically in the introduction, it is implicit that it is up to the company to choose whether they want to buy something or rather rent it.</p>
General comments	<p>Would it be possible to include information for the users of the GPP criteria that they should award sufficient points to companies that obtained the EU Ecolabel? Obtaining the label has a cost, so sufficient flexibility on the price is justifiable.</p>	<p>Answers to comments on GPP can be found in the corresponding report.</p>

General comments	Concerning mandatory criteria we agree on Criterion M1, Criterion M3, Criterion M4, Criterion M5 and Criterion M7.	Comment accepted.
Point system		
Choice of mandatory criteria	<p>it is not clear how does it work the evaluation criteria for the mandatory group . in particular, because the number of starlet (*) of optional criteria represent the point assigned for the item, it is not clear how it is the mechanism of evaluation for the mandatory criteria. it seems to be asked to choose between two class of points. for example, for environmental improvement it is possible to choose between low improvement (*) and high improvement (**), etc....</p> <p>we ask to clarify the assignment of the points for each criteria.</p> <p>consequently, we ask to clarify if it is possible for a company that has a sum of low evaluations (*) in the mandatory criteria to get the Ecolabel certification by getting more than 6 points (main service) +7 points (additional service/....) in the optional criteria.</p>	<p>Comment accepted. The text on the points system and the way the mandatory criteria were chosen has been updated and clarified.</p> <p>Indeed, the applicant cannot choose the mandatory criteria they fulfil, they have to fulfil them all (i.e. they cannot get any "low evaluations" for these criteria).</p>
Choice of mandatory criteria	<p>BEUC and the EEB have concerns regarding the three pillars that the JRC used to define mandatory criteria. Although we recognize the importance of the technical and economic feasibility of the criteria, we hold the view that the environmental improvement potential should be the key factor in the development of Ecolabel criteria. The potential environmental benefits should then count for at least half of the criteria development as the EU Ecolabel aims to reward the best environmentally performing cleaning companies. The economic and technical factors should be considered for the remaining 50% in drafting the mandatory criteria.</p>	<p>Comment accepted. The selection of the mandatory criteria has been updated and gives preference to all criteria that have the biggest potential environmental improvement while still implementable at SME level, no weighting is done at that stage. For the optional criteria, the environmental aspects do indeed have a weight of 50% in the calculation (technical feasibility represents 20% and economic feasibility make up the remaining 30%) and are the main factor</p>
Point system mistake	<p>We support the introduction of a point system. We also appreciate the great job on systematizing the amount of point rewarded based on the environmental impact and more. But looking at annex b we are confused by the calculation. For example is looks like if a solution is difficult to implement (1 weight) the company will be awarded less points it the solution was easy to implement (3 weight). Why is this? We suggest that solution difficult (and also having a higher investment) should be</p>	<p>Comment accepted. The point system has been reworked so that it always awards the most points for options that have the biggest potential environmental gain, are harder to implement and are more costly.</p>

	<p>awarded more points.</p> <p>Example waste sorting at the cleaning site is 3 points – and compared to this certified EMAS is only 2 points (here the effort and cost are higher but the environmental gain is much higher since sorting of waste would be included if the system is certified).</p>	
Ambition level	<p>Regarding the optional criteria set, BEUC and the EEB are very concerned to see that the JRC proposes to award the Ecolabel to companies performing only 6 out of 16 points in the optional criteria, and only 3 points out of 7 in the additional aspects criteria. Achieving 40% of the optional criteria set is in our view not ambitious enough and would undermine the credibility of the Ecolabel, which is to make best environmentally performing companies stand out in the market.</p> <p>We therefore recommend to raise the minimum points to achieve from 6 to 10 points on the main service aspects as this would be more in line with the objectives of the label which needs to remain trustworthy for consumers.</p>	<p>Comment accepted. The number of points to be achieved has been updated.</p> <p>Moreover, it should be noted that the minimum number of points required cannot be directly linked to the ambition level – indeed, the minimum number of points can be artificially increased with "easy" points that all companies can achieve. The aim of the EU Ecolabel is to set ambitious criteria and set the minimum number of points to achieve based on the observed market trends.</p>
Ambition level	<p>It's unclear for me if the ambition level is top 20% as the EU Ecolabel aims. I'll be visiting a small a mid-size enterprise but because changes to the criteria will take place, especially on the point system, it will probably stay unclear for me if the ambition level is sufficiently high.</p>	<p>Comment acknowledged. The criteria have been updated to offer more flexibility to applicants but the ambition level has been kept the same, if not increased. Based on a survey performed on European cleaning companies the top performers should be highlighted with the proposed approach.</p>
Ambition level	<p>It is therefore of utmost importance that the weighting of the points foreseen will not be aggravated, i.e. that within the optional criteria the minimum number of 6 points out of the 16 points for the main service (optional criteria O1 to O6) will be kept or reduced but in no way increased.</p>	<p>Comment partially accepted. The point system has been reworked and several new criteria have been added to add more flexibility for applicants to choose the options that best suit their practices.</p>
On-site visits		
Annual visits	<p>On-site inspections both at the applicant's premises and at the client's premises are essential to assess and verify compliance of the company</p>	<p>Comment partially accepted. On-site visits are required before the awarding of the EU Ecolabel in order to assess a cleaning company's performance and check documentation (at the CB's discretion). While</p>

	<p>with the Ecolabel criteria.</p> <p>However, BEUC and the EEB hold the view that they should be carried out once per year and not less often to assess the company's performance on a regular basis.</p>	<p>annual visits would be ideal, multiple CBs have pointed out that there might a lack of resources in some cases.</p>
Number of visits	<p>I've serious doubts that 1 on-site inspection is sufficient to avoid misuse of the label. The credibility of the label should be guaranteed. Depending on the number of sites that are cleaned by the company, the number of sites to be verified should vary.</p>	<p>Comment acknowledged. Ideally every site should be visited but multiple CBs have pointed out that there might a lack of resources in some cases. As such, a specific number of visits cannot be set beyond the minimum number of visits required for the initial issue of a licence.</p>
Number of visits	<p>I agree for on-site inspection at the applicant's premises</p> <p>For the on-site inspection of the cleaning service being provided at a client's premises. It could be necessary to apply rules of sampling.</p> <p>To illustrate, hereafter are the rules that AFNOR Certification applies for ISO 9001/ISO 14001/OHSAS 18001 certification:</p> <p>Audit timeframe on temporary sites and sampling of these sites:</p> <p>Definition of a temporary site:</p> <p>A site belonging to our customer's customer, involving the workforce concerned by the certification (i.e. applying the Management System to be certified). Examples: a building site for a customer in the Building and Public Works sector, the offices of a company in which our customer provides cleaning, maintenance or surveillance services (security), etc.</p> <p>A site set up by our customer to conduct a specific task or provide a service during a defined period of time and which will not become a permanent site. Example: Offshore platform, facility management, canteen, etc.</p> <p>The number of temporary sites to be audited is determined in line with the table below:</p>	<p>Comment partially accepted. No specific approach is proposed for calculating the number of on-site visits (beyond the minimum required) as multiple CBs have pointed out that there might a lack of resources in some cases.</p>

	Number of temporary sites belonging to our customer's customer	Minimum number of temporary sites to be audited	
		Initial / Renewal	Surveillance
	1	1	1
	2 to 25	2	1
	26 to 100	3	1
	151 to 1200	5	2
	>1200	7	4
List of sites	The applicants should provide the CB's an at all time up-to-date list of sites that are cleaned by them. This to make sure that unannounced inspections can take place.		Comment accepted. A sentence has been added to the general assessment and verification text with this requirement.
General	In this product group onsite visit is essential. Only by on site audit, especially at customer sites, will it be possible to ensure that many of the requirement is implemented, eg training and use of ecolabelled products.		Comment accepted.
Assessment and verification - general			
Sub-contracting	<p>The use of subcontractors is common business in the cleaning sector. It should be clarified how we have to handle this. Is it allowed to use subcontractors or not? If it's allowed, they should be awarded with the EU Ecolabel too. How will we treat companies that are specialized in part of the work normally done by the cleaning company?</p> <p>Washroom services: http://www.elis.com/en/sanitary/our-sanitary-service/index.html</p> <p>It is apparently very common to work with a company like this. But it's no use that the staff if this company complies with all EU Ecolabel criteria,</p>		Comment accepted. As in the EU Ecolabel criteria for Tourist and campsite accommodations, sub-contractors that perform tasks covered by one or more of the criteria must perform them in a manner that fulfils the requirements set within. There is now a clear mention of sub-contractors in the general assessment and verification indications.

	<p>since they are not all relevant for the services they provide.</p> <p>For several requirements is shall be established how outsourced or sub-contractor shall be verified and how they shall document compliance!</p>	
User manual	Any assessment and verification process must remain simple and focused. It is therefore important that a user manual will be drawn up containing the items to be checked. It is important to exactly set out how compliance with each criterion can be demonstrated, i.e. what kind of documents of other proofs need to be provided.	Comment accepted.
General	<p>A general paragraph on Assessment and verification should be added like in other EU Ecolabel Decisions including the following issues.</p> <ol style="list-style-type: none"> 1. 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. 2. In general, self declarations should be avoided since it is very difficult / impossible to verify them. Declarations of compliance if any must be accompanied by documents providing certified evidence of compliance with the criteria. 3. Where appropriate, Competent Bodies may require supporting documentation and may carry out independent verifications. 4. Within the duration of the EU Ecolabel license the applicant shall keep all documents presented to the CB during application that demonstrate the respect of criteria. 	Comment accepted. The proposed requirements cover all the listed points and are modelled after the requirements found in other EU Ecolabel criteria.
Criteria proposal		
Day cleaning	Companies that perform day cleaning or promote day cleaning could be rewarded with a bonus point due to the reduction in energy consumption because buildings have to be heated and lighted less (Savings claimed to be 4-8% energy consumption)	Comment accepted. There is a new trend towards more day cleaning and it is proposed to consider establishing a minimum requirement promoting day cleaning during the next revision of the criteria.

Lower chemical user	<p>Other relevant criteria</p> <p>A requirement aiming at lowering the amount of chemicals used should be introduced.</p> <p>The Nordic Ecolabel has a mandatory maximum use and a lower consumption is awarded by points. We suggest to introduce a similar requirement.</p> <p>Nordic Ecolabel O4: Chemical consumption in excess of 640 µl (microliter)/m2 is not permitted.</p>	<p>Comment acknowledged. The issue of lower chemical use was studied during the early stages of criteria development. While the Nordic Swan covers a region that is rather homogeneous in terms of practices, the overall European landscape is quite different and cleanliness perception largely varies. As such no thresholds were found that would fit this diversity and de facto exclude large portions of potential applicants. Moreover, as can be seen with the new proposed limits in Nordic Swan, it is very difficult to set a limit – the new limit proposed to be set in that criteria is five times lower than the one found in the current criteria and this difficulty is acknowledged in the report that was published along with the new proposal.</p>
Energy management	<p>We think that it is important to include a new mandatory criterion about the energy manage of the cleaning sites. We propose to require to cleaning services a protocol of energy saving of the cleaning sites with guidelines about turn on and off the lights and the heating and cooling systems.</p>	<p>Comment rejected. The sites are managed by the clients and not the cleaning companies as such this type of requirement cannot be set (it can be potentially proposed in GPP). The turning off of lights is one of the measures that is to be covered by staff training as part of good environmental practices.</p>
Dust control mats	<p>Regularly serviced dust control mat systems reduce entry and spread of soiling into buildings, thereby significantly reducing the amount of detergents needed for cleaning.</p> <p>The use of regularly-serviced dust control mat systems reduce entry and spread of soiling into buildings, thereby significantly reducing the amount of detergents needed for cleaning. (44% cleaning time savings and 14% cleaning cost savings - Source: The Clean way to cut cost, ETSA).</p>	<p>Comment partially accepted. The use of dust control is not universal in Europe and as such no criterion is proposed at this point. Dust control mats and other pre-emptive measures can, nevertheless, be added to the list of criteria to be considered during the next criteria revision.</p>
Other		
Ambition level	<p>The “environmental ambition” level of the draft criteria is lower than the level of the Italian GPP Criteri Ambientali Minimi – CAM (Minimum Environmental Criteria) defined by the Ministry of the environment for cleaning services.</p> <p>If no changes occur EU Ecolabel for cleaning services will not satisfy the Italian GPP criteria for cleaning services that are becoming mandatory for all public contracting authorities.</p> <p>Changes proposed hereinafter aim to make the EU Ecolabel criteria</p>	<p>Comment accepted. The Italian GPP criteria were consulted during the development of the EU Ecolabel criteria but some of the requirements could not be replicated as they are not feasible throughout the EU28 territory or not feasible for SMEs.</p>

	<p>coherent with the environmental ambition level of Italian CAM. Moreover it should be considered that EU Ecolabel products can be easily purchased all over the EU.</p> <p>In any case since the main cost of the cleaning service is due to the personnel employed it is highly likely that the proposed changes will not result in a major burden for applicants.</p>	
Optional criteria	<p>Apart from criteria O4 on EMAS registration and O9 on outsourced services and products, optional criteria can easily and usefully be moved to the mandatory section. In fact the use of optional criteria doesn't appear justified neither by a too high total number of criteria nor by the need to give applicants more flexibility in the implementation of very arduous criteria or conversely of less significant criteria (not related to primary environmental aspects).</p> <p>Therefore all optional criteria are proposed for deletion and their main content is proposed for inclusion in mandatory criteria. As a result the total number of criteria will be reduced to 12 and all of them will be mandatory (the current EC proposal includes 8 mandatory criteria + 9 optional criteria = 17 criteria);</p>	Comment rejected. If all the optional criteria are made mandatory, the pool of potential applicants is greatly reduced. The aim of these EU Ecolabel criteria is to become stricter over time and push towards more environmentally conscious practices in the whole sector.
Foreword proposal	<p>A Foreword section should be added at the beginning of the Annex to include the following general statements:</p> <p>a. the EU Ecolabel criteria reflect the best environmental performing products and activities on the cleaning services market,</p> <p>b. the applicant is the service provider,</p> <p>c. before awarding the license Competent Bodies shall carry out on-site inspections where the service is being performed,</p> <p>d. "other Type I environmental labels" (in accordance with ISO 14024) are considered equivalent to the EU Ecolabel only if they include at least all the EU Ecolabel criteria.</p>	Comment partially accepted. The proposed points are already covered by the pre-ambule and the annex of the pre-ambule (please see the "legal text" file for easy-to-read version that contains the proposed pre-ambule).
Pre-requisite proposal	<p>As pre-requisites the applicant should:</p> <p>a. the service should meet all respective legal requirements of the</p>	Comment partially accepted. A new text on pre-requisites is proposed in the criteria and has been agreed on by the different Commission

	<p>country in which the it is performed.</p> <p>In particular, it shall be guaranteed that:</p> <ul style="list-style-type: none"> - the organization providing the service is operational and registered, as required by national and/or local laws and its staff are legally employed and insured, - the following fundamental principles and rights at work for employees dedicated to the service are respected: <ul style="list-style-type: none"> i. a policy against commercial, sexual or any other form of exploitation and harassment, particularly of children, adolescents, women and minorities is in place, ii. equal employment opportunities to women, local minorities and others, including in management positions is offered, while restraining child labour, iii. the international or national legal protection of employees is respected, and employees are paid at least a living wage, iv. employees' working hours comply with national or international law or benchmark industry standards, whichever affords employees most protection, v. employees are free to enter their employment through their own choice / leave their employment when they choose without penalty. <p>Assessment and verification</p> <p>The applicant shall declare the service's compliance with this requirement and demonstrate compliance, using independent verification or documentary evidence (e.g. copies of contracts, salaries slips, national social security system registration numbers of employees, construction license/authorization, etc). This will be checked during the on-site visit. Verification shall include interviews to staff (phone and/or onsite);</p> <ul style="list-style-type: none"> b. the applicant should have appointed a quality management for the 	<p>directorates and services.</p>
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	<p>service (includes previous O6 criterion)</p> <p>The applicant shall have appointed a service manager to organize and supervise the cleaning 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.</p> <p>The applicant shall have implemented a quality management system for the service that shall at minimum include the following components;</p> <ul style="list-style-type: none"> - 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; <p>The applicant shall provide 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:</p> <ul style="list-style-type: none"> - 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). <p>The company shall maintain records demonstrating the compliance with this requirement.</p>	
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	<p>Assessment and verification</p> <p>The applicant shall provide a declaration of compliance with this criterion supported by:</p> <ul style="list-style-type: none"> - a document identifying the manager responsible for the compliance with this criterion (an organization chart may be used to describe the structure of the service provider and identify the manager), - copies of documents showing the company's quality management plan for the service (e.g. quality policy, procedures and quality check forms), - the company documents showing the procedures linked to cleaning quality for the service. <p>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.</p> <p>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 criterion.</p>	
Criterion M1: Use of cleaning products with lower environmental impact		
Threshold	<p>We recommend raising this requirement and requiring at least 70% by volume at purchase of cleaning products bought per year being ecolabelled products. The detergents product group is one of the most successful and we do not see any reasons to keep such a low threshold. In addition, this is a mean to boost the take-up of Ecolabel products in the market.</p>	<p>Comments accepted. The revised criteria proposes a minimum mandatory threshold of 50% in order to allow companies that have clients that request special products or that are located in areas with low EU Ecolabel/ISO Type I ecolabel availability to still have ways of complying with the criterion.</p>

	<p>It is of utmost importance to keep the percentage of 50% for the criterion M1 (a). It is not at all known how many cleaning products for professional use are available. The data set out in the technical report are not complete and therefore not clear. The number of available products for professional use differs greatly amongst the 28 EU Member States. The argument that those products can also be purchased in other countries is counterproductive. Transportation across borders would be involved, which is not eco-friendly. Moreover, this would not be feasible, as technical specifications of the product need to be in the language of the country where the product is used. Finally, an eventual increase of the percentage would lead to a massive exclusion of small and middle-sized companies (SME's).</p>	<p>A new optional criterion has been developed in order to acknowledge the fact that some companies go above and beyond the 50% threshold. They are proposed to be awarded points for either using more than 75% or 95% of EU Ecolabel/ISO Type I ecolabel products.</p>
	<p>50% ecolabeled products are low but acceptable. But an increased percentage should be recognized. Please refer to suggested new point criteria.</p>	
Calculation method	<p>We support the unit of calculation – by volume.</p> <p>To my understanding, the in-use value should be $20 \times 50 = 1000$.</p> <p>And 0.15 should be 2400.</p>	<p>Comments accepted. The volume-at-purchase is proposed as the calculation method.</p> <p>Concerning Table 10 in the 2nd draft of the technical report, there is indeed an error in row 3 of the Method 2, it should read 0.375 instead of 0.15. Indeed, the volumes reported for methods 2 and 3 are to obtain an in-use volume of 20l for traditional undiluted products and 30l of concentrated undiluted products. With the hypothesis that a concentrated undiluted product has a dilution rate of 1:80, 0.375l of product yields 30l of in-use solution.</p>
Assessment and verification	<p>It should be made clear which data should be provided to obtain the EU Ecolabel. E.g. the 6 months prior to the application.</p>	<p>Comment accepted.</p>
Hazardous substances – M1(b)	<p>We highly welcome the introduction of the Hazard Statements classification table that is applicable to non-ecolabelled products. However, we recommend introducing additional requirements on the non-ecolabelled products in order to ensure their safety and sustainability and suggest, in this respect, setting requirements aligned with the criterion on excluded or limited substances for All-Purpose Cleaners (APC). Service providers should not be awarded the EU Ecolabel if they make use of non-environmental friendly products containing hazardous compounds and causing harm to consumers and the environment. As many of the</p>	<p>Comments acknowledged. While this type of requirement is present in other ecolabels for cleaning services, it is not proposed to include in this version of the EU Ecolabel criteria in order to minimise the burden associated with the assessment and verification. As explained further in Section 5.1.1, the non-presence of a substance on a label/SDS is not a guarantee that it's not present in the product – with such as a requirement, a cleaning company would have to contact the manufacturers of their cleaning products to obtain declarations from</p>

	<p>existing products available on the market cause damages to the environment through toxic volatile emissions and water pollution, it is essential to ensure their strict exclusion of the EU Ecolabel cleaning services, as the aim of the EU Flower is to promote products and services with the best environmental profile.</p>	<p>them and/or potentially suppliers lower down the line.</p>
	<p>We do not think this requirement is sufficient. Even not Ecolabeled there should be requirement to the rest of the chemicals used. The impact from the chemical used is highlighted as a “hot spot” and should therefore be regulated more. We suggest to make a declaration mandatory from chemical supplier and comply with the limited substances criterion also suggested for cleaning chemicals. The following list is taken from the Nordic ecolabel:</p> <ul style="list-style-type: none"> · Reactive chloro-compounds, for example sodium hypochlorite, although reactive chlore-compounds may be used if the authority prescribes it or when disinfection of swimming pool. · Organochlorine compounds, although benzalkonium chloride may be used on surfaces where necessary in order to prevent microbiological growth (e.g. in saunas). Justification for use of benzalkonium chloride on the surfaces in question must be submitted. <p>·Alkylphenol ethoxylates (APEOs) and derivatives of APEO</p> <p>Linear alkyl benzene sulfonates (LAS)</p> <p>EDTA, DTPA and NTA</p> <p>Silver-nanoparticles</p> <p>Perfluorinated and polyfluorinated alkylated substances (PFAS)</p> <p>Methyl dibromo Glutaronitrile (MG)</p> <p>Optical brighteners</p>	
Wet wipes	<p>It is also important to include chemicals used in micro fiber mobs (and other products) in this requirement.</p>	<p>Comment accepted. The new proposed criterion text covers the use of these products. As their packaging often does not indicate volumetric information, they are not to be counted in the volume-at-purchase calculations of M1(a) but they must fulfil the requirements set out in M1(b).</p>
Product availability	<p>Regarding the criterion M1 (b), more expertise is needed on the availability of non-toxic products. For certain applications, as for example periodic deep cleaning of floors, it is very difficult to get non-toxic</p>	<p>Comment accepted. Catalogue research of products for periodic cleaning of floors and alike surfaces from brands such as Diversey has</p>

	substances. Further market research has to be therefore carried out before keeping this criterion.	shown that products without hazard statements exist on the market. Products for extremely specialised use, which require special machines and protective wear, do tend to carry H412 and such hazard labels but they do not fall under the proposed scope of the EU Ecolabel.
Criterion wording proposal	<p>Criterion M1 - Use of cleaning products with lower environmental impact (includes previous O1 criterion)</p> <p>Only products directly related to indoor cleaning service operations are covered by this criterion. All M1(a), M1(b) and M1(c) sub-criteria must be fulfilled by the applicant.</p> <p>M1 (a) EU Ecolabel and other ISO Type I ecolabel products</p> <p>M1(b) Harmful Substances</p> <p>M1(c) Undiluted cleaning products (includes previous O1 criterion)</p> <p>At least 30% by volume at purchase of all cleaning products used per year in performing the service shall be undiluted products with a minimum percentage of active substance of 30%.</p> <p>Note: this point (c) substitutes the first optional criterion that should be deleted.</p> <p><i>Assessment and verification:</i></p> <p>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 performing the service. 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.</p>	<p>Comment rejected. The percentage of active content (AC) in a cleaning product is not easily verifiable as not all active contents must be declared on an SDS and those that are declared are given in terms of percentage ranges in order not to disclose formulations. If the AC approach were to be taken, the applicants would be required to request this type of information from their suppliers for every single product used as part of the cleaning operations. Moreover, discussions with two major producers of professional grade cleaning products have led us to believe that the threshold of 30% AC is extremely high, even for highly concentrated undiluted products. Products with dilution rates of 1:125 and higher only tend to contain 12 to 15% of AC.</p> <p>Concerning making the criterion on the use of undiluted products mandatory, it is not proposed in the revised criteria in order to provide more flexibility to companies and also acknowledge that some companies use very few products, which is an environmentally conscious decision, and requesting the mandatory use of highly concentrated undiluted products might be detrimental to their business.</p>
Criterion M2: Cleaning product dosing		

Criterion status	We propose to include Criterion M2: Cleaning product dosage in Criterion M5: Staff training.	Comment rejected. The criterion on Staff Training calls for the documents related to the training and will not necessarily show that staff have access in their work locations to dosing instructions and dosing apparatus. Thus, the requirements in this criterion are proposed to be kept separate.
Criterion wording	User instructions of the dosage apparatus? They should also on-site have access to information indication the right dosage used for each cleaning product. For example through a workplan.	Comment accepted. The wording of the criterion has been amended to reflect that the instructions should include indications both on how the apparatus works and the dosing instructions.
Feasibility	It is unrealistic to have a dosage system at small cleaning sites. If such a dosage system is not installed or provided for by the client it must be provided for by the cleaning company. This is regularly not the case for small sites.	Comment rejected. The wording of the criterion has been amended to reflect the fact that it does not only cover automatic dosing system (which would have to be installed on site) but also simple manual dosing systems such as beakers and hand pumps or even sprays that dose out products.
Assessment and verification	Regarding the assessment and verification, this is partly covered by criterion M5 (staff training) where it is stated that "staff shall be trained to use the correct product dosage for each cleaning task".	Comment accepted. The same documents can be used as a means of verification for the two criteria, if they clearly indicate which apparatus and what dosage should be used.
Criterion rewording proposal	<p>Criterion M2 - Cleaning product dosage and dilution</p> <p>Cleaning staff shall have access to dosing as well as diluting apparatus appropriate for the cleaning products used on each site where the service is being performed and the corresponding user instructions.</p> <p>Assessment and verification</p> <p>The applicant shall provide a declaration of compliance with this criterion supported by the appropriate documentation showing the user instructions for correct dosing and dilution, as provided to the cleaning staff.</p>	Comment accepted. The wording of the criterion has been amended to explicitly mention dilution.
Criterion M3: User of microfibre products		
Wording	I'm not sure what the intention is of mentioning rags here. To my understanding rags are used for example in garages to clean very dirty surfaces and afterwards thrown away. They are often a selection of 2nd	Comment accepted. The wording of the criterion has been amended and the word "rag" is no longer used as, indeed, it more often refers to reused textiles and they are not used by professional cleaning companies

	hand textiles that cannot be re-used.	as part of routine cleaning.
Threshold	<p>We recommend raising the threshold from 50% to at least 70% of textile cleaning accessories made of microfiber.</p> <p>We see many benefits of using cleaning textiles made of microfiber:</p> <ul style="list-style-type: none"> - They improve the cleaning performance and allow a deep cleaning. - They help reducing the contribution to the waste stream and the use of water and harmful chemicals, compared to other cleaning materials. - They help reducing cross-contamination risks, which is of high importance in areas such as hospitals. <p>The use of microfiber products is fully in line with the objectives of the scheme.</p>	<p>Comments accepted. The requirement for the use of microfibre products is proposed to be separated into two criteria – one mandatory with a threshold of 50% and one optional to award points to companies that go beyond 75% or 95%.</p>
Threshold	<p>Here again it is very important to keep the percentage of 50% because microfiber products cannot be used for all cleaning tasks, such as in cleanrooms or for periodic deep cleaning of floors. Finally, it would lead to an exclusion of SME's.</p>	
General comment	<p>The use of microfiber textile cleaning accessories reduces water and chemical consumption significantly, The availability of them is good, in all countries in Europe and therefore, it should be required that textile cleaning accessories are always used when possible.</p>	<p>Comment acknowledged.</p>
Criterion rewording proposal	<p>Criterion M3 - Use of microfiber textile products (includes previous O2 criterion)</p> <p>Only textile cleaning accessories that are directly related to indoor cleaning services operations are covered by this criterion.</p> <p>At least 50-80% by <u>number of articles or pieces</u> of the textile cleaning accessories (e.g. cloths, head mops and rags) used per year <u>in performing the service</u> shall be made of microfiber or <u>shall have been awarded with the Ecolabel UE or other equivalent Type 1 environmental label.</u></p> <p>Assessment and verification:</p> <p>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 <u>in performing the service</u></p>	<p>Comment partially rejected. The proposed criterion wording cannot be used as proposed as:</p> <ul style="list-style-type: none"> - it might lead to double counting or confusion as microfibre products can be awarded the EU Ecolabel or another ISO Type I ecolabel, - microfibre products are much more readily available on the market than EU Ecolabel/ISO type I ecolabel products and the proposed wording considers them as equals. <p>Nevertheless, the first sentence of the criterion has been amended to reflect the proposed change of including "in performing the service". The wording now is clearer that it concerns the products used during the service provision.</p>

	and marking which textile cleaning accessories are made of microfiber used.	
Criterion M4: Staff training		
Wording clarification	First of all, the training should be only requested for the areas that are part of the contract.	Comment partially accepted. The EU Ecolabel is not proposed to be awarded for single contracts nevertheless there is a provision that staff should only be trained for the tasks and areas that are relevant to them.
Training delays	The requirement to provide adequate training to all new staff (either permanent or temporary staff) within four weeks of starting employment is not at all feasible. The timeframe must be increased to three months.	Comments partially accepted. The delay of four weeks is proposed to be kept as minimum training should be provided as soon as possible to all staff to ensure quality work.
	<p>We fully support the criteria proposed by the JRC. It is important that the new staff members are trained within 4 weeks after their starting date so that they are well educated, can incorporate best practices and behave in a responsible manner as soon as possible.</p> <p>We agree that staff should be updated once a year on the environmentally friendly practices at work.</p>	
Overtaking contract/staff	Secondly, it must be taken into account that in a case of a transfer of undertaking (Directive 2001/23/EC), the staff is already working at the client's site and is already trained.	Comment accepted. This case is now explicitly mentioned in the assessment and verification and it is indicated that there is no need to retrain them if there is proof that they have already followed the requirement training with their previous employer.
Scope	Add training on product use. (Add additional line for cleaning products: Staff shall be trained to refill and exchange cleaning supplies such as textile towel rolls, paper and soap.)	Comment rejected. The staff training criterion lists all training areas that are related to environmental improvement and not general training. Taking care of consumables does not fall under that category.
	<p>Add "— Cleaning products management including the safekeeping of products." under "cleaning products".</p> <p>Add:</p> <p>"Cleaning equipment:</p> <p>— Staff shall be trained to use cleaning equipment. Training should</p>	Comment partially accepted. The appropriate storage of cleaning products has been added as a topic that should be covered as it can help avoid spillages and therefore waterway pollution. Cleaning equipment use is implicitly covered under the use of cleaning products and their minimisation.

	include equipment maintenance and safekeeping."	
Waste issues	<p>Waste disposal is only rarely the task of cleaning staff. Therefore the wording must be changed and aligned to the optional criterion O5 by stating that the handling of waste should be trained according to the local and national regulations and according to what is foreseen at the client's premises.</p> <p>Reference to the disposal of hazardous waste needs to be better defined, as the disposal of hazardous waste is hardly within the scope. It is therefore important to exactly determine to what kind of hazardous waste this is referring (for example batteries).</p>	Comments accepted. The wording referring to waste handling is now aligned to Criteria M6 and O8. Hazardous waste is no longer mentioned as a topic to be covered as it has been determined as not an issue that cleaning company staff should encounter frequently.
Regional differences	Finally, training is carried out very differently all over Europe. This has to be taken into account. Training staff requires time and (human and financial) investment and directly translates into cost. In any case, the requirement that this training should be for a duration of 16 hours (2 days per 8 hours) is much too demanding. A much shorter timeframe is enough. Otherwise this would lead to a massive exclusion of SME's.	Comment accepted. No minimum training hours are set in the proposed criterion on staff training. For the GPP criteria, a duration of 16 hours is proposed but the procurer can adapt this requirement to their local practices and market.
Temporary staff	Temporary workers have to be treated differently from permanently employed staff. Those hired for just a short time assignment cannot be treated equally to permanent employed staff. Therefore an initial training of 3-4 hours is sufficient.	Comment rejected. Training is a very important aspect of cleaning services and all staff should be provided adequate training. Short contracts should be avoided, but if they cannot, initial training can be done at the start but should be followed up by a full training as described in the staff training criterion.
Criterion M5: Basis of an Environmental management system		
Difference between mandatory and optional EMS	<p>For the sake of SME's, we strongly object criterion M7. There must be a much clearer distinction between criterion M7 and the optional criterion O4. The M7 requirement of having implemented an environmental policy, a precise action plan and an audit process is much too demanding, especially for SME's.</p> <p>There is a very strong risk that the majority of the companies in the cleaning sector will be thus excluded from the Ecolabel , as it is made of mainly SME's that cannot afford to meet this criterion. Furthermore, the M7 criterion is only possible for the whole company, not for a financial</p>	Comment accepted. The wording of the mandatory criterion has been updated to make the requirements clearer and differentiate it well from the optional criterion. As even a simplified EMS has been demonstrated to have environmental benefits, the mandatory criterion is proposed to be kept.

	<p>profit center, a service line or a single contract.</p> <p>The difference between criterion M7 and criterion O4 is so small that it's a much too high burden for SME's to comply with criterion M7. Therefore, either the requirements in the M7 criterion must be strongly lowered or the whole criterion needs to be classified as optional and merged with criterion O4.</p>	
Annual audit	<p>We welcome the management systems to be mandatory but audits should be performed each year. An audit every second year will not ensure proper focus on the action plan and goals set. In all management systems a yearly evaluation by the management (supported by an internal audit) is mandatory. We suggest to also add a yearly evaluation by the management</p>	<p>Comment accepted. An annotation has been added that the internal audit should be done on an annual basis.</p>
M7/O4 differentiation	<p>When there is the requirement M7 the criterion O4 is not needed. We can't see that the added value of the third party certification is big enough to be awarded points.</p>	<p>Comment rejected. The wording of the mandatory criterion has been updated to differentiate well from the optional criterion. As even a simplified EMS has been demonstrated to have environmental benefits, the mandatory criterion is proposed to be kept.</p>
Wording proposal	<p><u>In performing the service the applicant shall be able to implement an environmental management system aimed at minimizing the environmental impact of the cleaning service itself. The EMS for the specific cleaning service shall be compliant with a recognized international standard which includes EMAS requirements for set the basis for an Environmental Management System by implementing the following processes:</u></p> <ul style="list-style-type: none"> • <u>an environmental review considering all environmental aspects of the service, methods to assess them, relevant legal and regulatory framework and existing environmental management practices and procedures;</u> • <u>An environmental policy identifying the most relevant direct and indirect environmental impacts and the organisation's policy toward these impacts, containing commitment both to comply with all relevant environmental legislation and to achieve continuous improvements in environmental performance;</u> • <u>an environmental program that contains environmental objectives.</u> 	<p>Comment partially accepted. The wording of the criterion has been updated and some of the proposed changes have been added to that wording.</p>

~~targets .—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 based on the characteristics of the specific cleaning service as well as its duration and supported by the collection of data on the use of resources and other environmental aspects (e.g. waste generation);~~

~~• an effective environmental management system (EMS) aimed at achieving the organisation's environmental policy and at improving the environmental performance continually. The management system needs to set responsibilities, means to achieve objectives, operational procedures, training needs, monitoring and communication systems;~~

~~• an environmental audit assessing in particular the management system in place and conformity with the organisation's policy and programme as well as compliance with relevant environmental regulatory requirements. 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 review, the environmental policy, the environmental program, the environmental management system (EMS) and the environmental audit and the performance of the organisation with regard to the targets shall be available for consultation by the public at the applicant's premises cleaning service site. Comments and feedback from clients collected by means of a questionnaire or checklist or letter boxes in the cleaning service site shall be taken into account.~~

~~Assessment and verification:~~

~~The applicant shall provide a declaration of compliance with this criterion supported by a copy clear and exhaustive description of the environmental review, the environmental policy, the environmental action program, the environmental management system and the environmental audit report and. The declaration of compliance shall also be supported by 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.	
Criterion M6: Solid waste sorting at the applicant's premises		
General	<p>This criterion should be deleted since it refers in general terms to the applicant not to a specific cleaning service_(and replaced by the following which combines M5 and O5)</p> <p><u>Only waste generated at the cleaning sites are covered by this criterion. The following waste generated at the cleaning sites shall be sorted into relevant waste stream categories and disposed of according to the national and local rules in force:</u></p> <p><u>1. solid waste generated by the cleaning service operations (e. g. detergent bottles, mops, cloths, single-use gloves, etc...),</u></p> <p><u>2. solid waste other than those referred to at the previous point 1. (e. g. paper, toner, ink-cartridge, drink cans and bottles, glasses, etc) if included into the cleaning service contract.</u></p> <p><u>Assessment and verification</u></p> <p><u>The applicant shall provide a declaration of compliance supported by documents indicating his responsibility about waste referred to in the previous point 2., the resulting list categories of solid waste collected and sorted at the cleaning sites and the relevant national and local rules in force.</u></p> <p><u>The list of all relevant contracting party charged of further treatment/disposal of such waste should be provided.</u></p>	Comment rejected. The differentiation between the applicant's premises and the client sites is necessary as not all companies are able to negotiate with their clients the waste handling, even for the waste generated as part of the cleaning operations.
Criterion X (removed): Wage policy (the requirements are now part of the EU Ecolabel pre-requisites and not in a separate criterion text)		
Sub-contracting	In case the cleaning services company is subcontracting its activities and uses the subcontractor's control system, the Ecolabel requirements	Comment partially accepted. If part of the cleaning service is sub-contracted and is covered by a criterion, the sub-contractor should be fulfil the same requirements as the cleaning company for that criterion.

	should ensure that the subcontractor also fulfils the same requirements.	Things like wages are now covered by the pre-requisites and subcontractors shall respect those as well.
General	<p>We fully support the social criteria in this service group. Social requirements are of high importance especially in this service group. It is crucial that the Ecolabel ensure good and fair conditions of employees.</p> <p>The cleaning service company shall fulfil all obligations concerning minimum wage - or collective agreements in the countries not having minimum wage-, pay taxes and social insurance.</p>	Comment acknowledged.
Verification	<p>The new requirement on assessment & verification is not correct: the scope of SA 8000 and ISO 26000 is much broader than the issue of wage.</p> <p>The requirement is good but the verification asked for is too complicated. For Sweden it would be enough if we received as a verification a copy of a signed collective agreement. It is not possible for a CB to check if a company follows the agreement or legislation.</p> <p>Add all relevant and accepted social standards in Europe. Otherwise only the one mentioned in the document will be required by the tenderer.</p> <p>In any case it must be avoided to require the implementation of the two standards enumerated (SA8000 and/or ISO26000) as this would be a too high cost for SME's, which would lead them to refrain from getting the Ecolabel.</p> <p>We think that it is not feasible to verify the salaries of all the workers of a cleaning company. We can get a responsible self-declaration of the company but, in our opinion, it is not feasible to get documentary proofs about the salaries of the workers according with recognised social responsibility standards (e.g. SA8000 or ISO26000).</p> <p>The requirement in the first draft was too complicated. Now the proposal is very limited and we suggest to have a more ambitious goal for this requirement. The intent must be to ensure that workers are paid and treated probably. We welcome more ideas to ensure this but think as a</p>	Comment acknowledged. The social criteria related to wages have been part of discussions for multiple EU Ecolabel criteria and have been decided to be included in the pre-requisites. The verification of these pre-requisites is proposed to be the same as the one done by Competent Bodies for all other EU Ecolabel criteria.

	<p>minimum that subcontractors shall be included as well.</p> <p>This is mandatory legislation. It's not the role of the EU Ecolabel to verify mandatory legislation.</p> <p>While we strongly support compliance with national minimum sector wages, we don't see how this can be verified and controlled with a declaration of compliance. The problem is that a company that fails to comply with the relevant wage policy in its country will also not hesitate to make false statements through a declaration of compliance. On the other side, such a declaration of compliance can be hold against this company in case other indications lead to further controls.</p> <p><u>In performing the service</u> 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.</p> <p>Assessment and verification</p> <p>The applicant shall provide a declaration of compliance with this criterion supported <u>by the reference to the collective contract</u> applied or documents demonstrating compliance with relevant and recognised social responsibility standards (e.g. SA8000 and/or ISO26000)</p>	
Worker's insurance	In addition, we recommend including an obligation for all staff members to have an accident insurance.	Comment rejected. Setting the proposed requirement is beyond the scope of the EU Ecolabel.
As pre-condition	We propose to replace Criterion M6 for a pre-condition criterion about the fulfilment of the national legislation: labour risk prevention, parity, and sectorial wage standards. As assessment and verification, it should be required a responsible self-declaration of the applicant.	Comment accepted.
Criterion 01: Undiluted cleaning products		
Minimum threshold	O1 should be mandatory to make sure that you are not encouraging diluted EU Ecolabel products.	Comment partially accepted. While there are more and more undiluted products that have been awarded EU Ecolabel licences and fulfil Criterion

	<p>Combine this criterion with M1 as M1(c)</p> <p>We ask for a more ambitious threshold of at least 50% by volume at purchase of all cleaning products used per year shall have a minimum dilution rate of 1:80.</p> <p>Our demand is achievable as there are today a large number of concentrated products especially in the professional sector.</p> <p>The percentage of 30% must be kept and not increased. Otherwise many SME's that do not have so many possibilities to dilute will not be able to reach this criterion.</p>	<p>M1, products such as undiluted window cleaners, kitchen cleaners or sanitary cleaners cannot be awarded an EU Ecolabel licence until the new criteria for the EU Ecolabel for Hard Surface Cleaners are voted and published. As such, not all companies would be able to fulfil a minimum of 30% of undiluted product use as of the development of these criteria. The reference dilution rate is proposed to be 1;100.</p>						
<p>Use of "minimum active concentrations"</p>	<p>Our association thinks that the right way to set up limits for undiluted and also for RTU products should be based on minimum percentage of active substance in the cleaning solution and not on the minimum dilution rate. As a matter of fact it is the real active content in the cleaning solution that works.</p> <p>For this reason we suggest to adopt the parameters called Minimum Active Concentrations (MAC) prepared by Afidamp to define a minimum acceptable level of active substance in the cleaning solution.</p> <p>The parameters come from this operation:</p> <p>Minimum Active Concentration = (Active substance %) x (Dilution %)</p> <p>In case of RTU products MAC parameter meets exactly the percentage of active substance (dilution rate is 100%).</p> <p>The tables were stated by the chemists of the associated companies. They work daily on the subject and the values indicated respond to the real tests on the field.</p> <p>Undiluted products</p> <table border="1" data-bbox="439 1313 1249 1380"> <thead> <tr> <th data-bbox="439 1313 710 1345">Product</th> <th data-bbox="710 1313 981 1345">Use</th> <th data-bbox="981 1313 1249 1345">MAC</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Product	Use	MAC				<p>Comment rejected. Please see the rationale for criterion for an explanation as to why the taking into account of the active content/substance of a product cannot be used a basis for this criterion. All criteria should be easily verifiable by the CBs and the real active content of products is not easily found on SDS and they would have to rely on self-declarations from product manufacturers.</p>
Product	Use	MAC						

	<table border="1"> <tr> <td>Dilutable all purpose cleaners</td> <td>Cleaning floors with low level of dirt</td> <td>7</td> </tr> <tr> <td>Dilutable all purpose cleaners</td> <td>Cleaning floors with high level of dirt</td> <td>15</td> </tr> </table> <p>Ready to use products (use with sprayer)</p> <table border="1"> <thead> <tr> <th>Product</th> <th>Use</th> <th>MAC</th> </tr> </thead> <tbody> <tr> <td>RTU Windows and surface cleaning</td> <td>Only for dusting</td> <td>2</td> </tr> <tr> <td>RTU Surface cleaning</td> <td>Fingerprint and grease</td> <td>10</td> </tr> <tr> <td>RTU Stain removers</td> <td>Ink and marking pen stains</td> <td>15</td> </tr> <tr> <td>RTU Kitchen cleaners</td> <td>Oil and grease stains</td> <td>7</td> </tr> <tr> <td>RTU Sanitary cleaners</td> <td></td> <td>3</td> </tr> <tr> <td>RTU Descaling products</td> <td></td> <td>10</td> </tr> </tbody> </table>	Dilutable all purpose cleaners	Cleaning floors with low level of dirt	7	Dilutable all purpose cleaners	Cleaning floors with high level of dirt	15	Product	Use	MAC	RTU Windows and surface cleaning	Only for dusting	2	RTU Surface cleaning	Fingerprint and grease	10	RTU Stain removers	Ink and marking pen stains	15	RTU Kitchen cleaners	Oil and grease stains	7	RTU Sanitary cleaners		3	RTU Descaling products		10	
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Definitions	Furthermore, the terms “concentrated” and “undiluted” have different meanings. The terminology must be clarified.	Comment accepted. The two terms are defined in the rationale provided for the criterion.																											
Criterion 04: Use of cleaning accessories with lower environmental impact																													
Mandatory criterion	BEUC and EEB first proposal is to make this criterion mandatory.	Comment rejected. The currently availability of EU Ecolabel or other ISO Type I cleaning accessories is extremely limited and many companies would not be able to find or afford these products if the criterion were made mandatory.																											

Limits proposed	<p>(BEUC and EEB first proposal is to make this criterion mandatory.)</p> <p>If this is not supported, consumers organisations and environmental NGOs recommend raising the thresholds as follows:</p> <p>O2 (a) Mops At least 80% of mops used per year shall have been awarded with the EU Ecolabel for Textiles or with another ISO Type I Ecolabel.</p> <p>O2 (b) Cloths At least 80% of cloths used per year shall have been awarded with the EU Ecolabel for Textiles or with another ISO Type I Ecolabel.</p> <p>It is of high importance that cleaning services companies use as much as possible ecolabelled products with lower environmental impact. It contributes to the education of the staff members and also fosters the uptake of ecolabelled products on the market.</p>	<p>Comment rejected. The currently availability of EU Ecolabel or other ISO Type I cleaning accessories is extremely limited. It is expected that the inclusion any type of criterion on such products will push other companies to sell EU Ecolabel mops and cloths and then during the next criteria revision the threshold will be proposed to be raised.</p>
Lower limits	<p>Low availability of EU-labelled microfiber products.</p> <p>We recommend to set a lower percentage level for EU Ecolabel for microfiber products, as there is still a low market availability.</p> <p>The 50% threshold is always difficult, even impossible to achieve.</p> <p>The percentage of 50% for eco-labelled mops and cloths is not feasible. This is even more the case, as it is not at all clear how many eco-labelled mops and cloths are available. The indication on page 63 of the report that 1.162 eco-labelled textile products are available does not help at all, as it only speaks about textile products without indication how many of those can be used for cleaning services. Relevant data is therefore needed.</p>	<p>Comment rejected. This is proposed to be an optional criterion and the current low availability of products is taken into account in the number of points attributed. Some such items are available so companies can make the choice of investing in them.</p>
Points attributed	<p>Finally, this criterion is not proportional: although the use of eco-labelled mops and cloths has only a limited impact on the environment a maximal score of four points can be achieved.</p>	<p>Comment accepted. The point system has been reworked, but it cannot be forgotten that economic and technical feasibility do make up 50% of the weight when attributing points to criteria and currently there is a very low availability of EU Ecolabel (or other ISO Type I ecolabel) products on</p>

		the market.
Other products	In Criterion O2: Use of cleaning accessories with lower environmental impact, it could be include another product: O2 (c) Plastic bags Used of 80% of recycled plastics bags. O2 (d) Compostable bags Used of 100% of compostable bags for organic waste. Assessment and verification: test according with UNE-EN 14995:2007 norm or ISO Type I Ecolabel, for instance, Catalan Ecolabel.	Comment rejected. The issue of waste bags was studied in the early stages of the development of the criteria. Currently there is no EU Ecolabel for waste bags and the availability of waste bags certified by other ISO Type I ecolabels is very geographically limited. As such no requirements are set for these types of products.
Mandatory criterion	Combine this criterion with M3.	Comment rejected. Due to the low availability of EU Ecolabel (or other ISO Type I ecolabel) cleaning accessories, they cannot be equated to microfibre products and cannot be included in Criterion M3.
Criterion O5: Consumable goods		
Feasibility	This criterion is not feasible. It is impossible for the cleaning company to comply with this criterion if the client wants other products or other volumes. If the client wants consumable goods with an Ecolabel, he must impose those products in the tender and pay for it. It is not up to the cleaning company to bear the additional costs of green products. This criterion is therefore only potentially achievable if the Ecolabel is awarded on a contract-based level.	Comment partially accepted. The criterion has been mandatory with thresholds other than 100% in order to allow leeway for companies. Not all their contracts must contain clauses that they provide EU ecolabel consumables.
Hand soaps	Furthermore, for dispensers that are already installed, it is not always possible to get the product. It needs to be clarified how many of the 490 products enumerated on page 47 are for professional use and for fitting into those dispensers.	Comment partially accepted. No exact data could be found on EU Ecolabel hand soaps that would fit pre-installed dispensers but the criterion is not mandatory and does not require the provision of 100% EU Ecolabel hand soaps.
Tissue paper	The access to EU Ecolabel and ISO 1 type ecolabelled tissue paper in Europe is good and therefore, the required share of ecolabelled tissue paper should be higher and/or there should be an optional requirement awarding points to the use of 90% ecolabelled tissue paper.	Comment accepted. The threshold for paper products has been increased to 90%.

<p>Thresholds</p>	<p>BEUC and the EEB do not agree with the proposed thresholds that we consider too low. We recommend that all products supplied are ecolabelled. If this is not supported, NGOs require as a minimum:</p> <ul style="list-style-type: none"> - At least 70% by volume of hand soaps - At least 90% of paper towels and tissues - At least 90% of toilet papers. <p>We consider these thresholds as minimum requirements. The paper products are among the most successful ones and have a high market penetration in all EU-28 countries, as stated in the technical report. NGOs do not see any reasons why the thresholds cannot be raised to 100% or at least 90%.</p>	<p>Comment partially accepted. While the availability of ISO Type ecolabel tissue paper is good, it cannot be forgotten that often cleaning companies provide consumable goods as they are defined in tenders and not all clients will request the use of such products. As such, requiring 100% of EU Ecolabel (or other ISO Type I ecolabel) toilet/tissue paper would de facto not allow some cleaning companies to aim for these points even though they are making efforts. The thresholds for paper products are, nevertheless, proposed to be increased to 90%.</p>
<p>Hand drying</p>	<p>There are three ways to dry one's hands. This draft proposal only addresses one way of drying one's hands: using a paper towel. We believe that it is unfair to address only one system (drying hands using paper towel) over three with a mandatory criterion. Having a mandatory criterion for paper towels and tissue only without a mandatory criterion for air dryer and textile towels could lead to an applicant skipping a mandatory criterion.</p> <p>Instead of promoting the use of eco-labelled products, the criteria would promote the use of materials and devices which have not invested in eco-labels over the past years, penalising the companies and the industry who strongly believed and invested in the EU eco-label scheme.</p> <p>At the same time, materials and devices that did not invest in eco-label in the past will not be motivated to do so now with the draft current criteria, as the market will not ask for eco-labelled drying devices and materials.</p> <p>In order to promote the use of eco-labelled products, we would propose the deletion of this mandatory criterion for paper towels and tissue and to add it as a optional criterion which would give three (3) points.</p> <p>Mandatory criterion should not be easily missed by applicants.</p> <p>There is no alternative to toilet paper therefore a mandatory criterion for</p>	<p>Comments accepted. The criterion on the provision of hand drying methods has been updated (and is proposed to be optional). Now all three hand drying methods are mentioned and are linked to requirements.</p>

	<p>toilet paper is fair (criterion M4c).</p> <p>There are few alternatives to paper towels and tissue. As other materials and devices awarded with an eco-label are not available on the market, the criterion on paper towels and tissue must be optional, rewarding the applicants who decide to use eco-labelled products.</p> <hr/> <p>Mention all hand drying methods: At the end of the paragraph M4 (b), add: Besides paper, textile towel rolls are also commonly used and accepted for hand drying.</p> <p>Besides paper, other hand drying methods should at least be mentioned, although no EU ecolabel criteria is currently available. If other hand drying methods are not mentioned, it could be assumed that ONLY paper is an accepted hand drying method.</p> <p>Consider textile towel rolls as an optional criterion to score and extra point as this system is particularly sustainable: Compared with paper over whole lifecycle, textile towel rolls:</p> <ul style="list-style-type: none"> - Use 63% less energy - Generate 48% less greenhouse gases - Generate up to 79% less waste <p>(Source: ETSA LCA of hand drying systems).</p> <p>For example: the optional criterion could be met through (1) company certification based on ISO 14001 and/or (2) type 1 Ecolabel.</p> <hr/> <p>The latest draft of the Cleaning Service Ecolabel only has criteria for one type of hand drying product, paper towels, the other methods air dryers and textile towels are excluded from scope. This means that any alternative to paper hand towels can be supplied irrespective of their impact on the environment. This risks allowing providers to supply environmentally inferior products to customers while having no impact on the ability to gain an ecolabel for cleaning service. Either this aspect, namely hand drying - is excluded from the ecolabel completely, thereby accepting it is out of scope or all three product types should have criteria to ensure a minimum standard of environmental performance.</p>	
ECAT data in report	<p>We have a tissue paper license holder. He is missing and has 77 tissue paper products (BEWIMA), he is in Ecat.</p> <hr/> <p>Unfortunately, due to the technical difficulties at the beginning of ECAT</p>	<p>Comments accepted. The mentions in the report of these data (and any previous errors linked to those mentions) have been updated.</p>

	<p>system, some of our license holders have still not registered all their products in ECAT. As a consequence, there are nearly 2000 tissue paper products in Swedish licenses missing in ECAT. The products are all AFH products belonging to the categories in the requirement and available in all countries in Europe. Therefore, it can be considered that the access to ecolabelled tissue paper products in all European countries is good.</p>	
<p>Wording proposal</p>	<p>Criterion M4 - Consumable goods</p> <p>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 <u>All the following sub-criteria must be fulfilled by the applicant in performing the service:</u></p> <p>M4 (a) Hand Soaps</p> <p>At least 30% 70% by volume of hand soaps supplied per year shall have been awarded with an the relevant EU Ecolabel for Rinse-off Cosmetics or another ISO type I Ecolabel.</p> <p>M4 (b) Paper towels and tissues</p> <p>At least 50% 70% by number of articles or pieces of paper towels and tissues supplied per year shall have been awarded with an the relevant EU Ecolabel for Tissue Paper or another ISO type I Ecolabel. <u>The remaining part of these products supplied per year shall have been awarded with a certification referring to forest management and/or chain of custody (e. g. FSC or PEFC).</u></p> <p>M4 (c) Toilet paper</p> <p>At least 50% 80% by number of articles or pieces of toilet paper supplied per year shall have been awarded with an the relevant EU Ecolabel for Tissue Paper or another ISO type I Ecolabel.</p> <p><u>M4 (d) Electric hand-dryer</u></p> <p><u>All electric hand-dryers that have to be installed by the applicant at the client premises must be switched on and off by proximity sensors;</u></p>	<p>Comment partially accepted. The wording of the proposed criterion has been updated and multiple of the proposals made have been adopted (e.g. different hand drying methods) while some others cannot be accepted (e.g. higher thresholds for hand soaps) as product availability is still low.</p>

	<p><u>M4 (e) Textile towels</u></p> <p><u>At least the 30% of textile towels that have to be provided by the applicant at the client premises shall have been awarded with the EU Ecolabel or another ISO type I ecolabel.</u></p> <p><u>Assessment and verification</u></p> <p>The applicant shall provide annual data (commercial name and volume or number of pieces) and documentation (including relevant invoices or site inventories) indicating the type and the amount of consumable goods supplied per year in each site where the service is being performed and marking which products have been awarded with the EU Ecolabel or with an ISO Type I Ecolabel and the corresponding license numbers. <u>NOTE: environmental impacts of electric hand-dryer and textile towels have to be reduced as well.</u></p>	
Criterion 06: Energy efficiency for vacuum cleaners		
Point attribution	How is it possible for a company to get the maximum vote if the cleaning service for the site needs only one or two vacuum machines? The maximum point (2 points) are given on the percentage of vacuum machines with the A label. The paradox is that a site where there are less than 10 vacuum machines gets a lower evaluation than a site where there are more than 10 vacuum machines and only ten have the label	Comment accepted. The number of points is now proposed to be dependent on a percentage rather than a discreet number of vacuum cleaners.
New purchases	BEUC and the EEB do not support this requirement. We rather recommend requiring that all new vacuum cleaners bought by the company meet class A on energy efficiency. This can be verified by invoices and technical data sheets.	Comment rejected. It is impossible to award points for the future purchase of products.
Wording clarification	It is necessary to clarify if this item is applied to the single site where the cleaning service is done or to the all vacuum machines of the company	Comment accepted. The wording of the criterion now states this criterion covers all the vacuum cleaners owned or leased by the applicant and used in the provision of EU Ecolabel services.
Mandatory /optional	Furthermore, we encourage the JRC to include the above mentioned criterion in the mandatory criteria set.	Comments partially accepted. The current availability of energy class A professional vacuums is extremely limited and, as such, it is not possible to make this a mandatory criterion.
	It is absolutely necessary to keep this criterion as optional. If it would be	

	classified as mandatory, it would strongly discriminate against small companies that would then do not have the possibility to get the Ecolabel.	
Criterion wording proposal	<p>Criterion M8 - Energy efficiency for vacuum cleaners (includes previous O3 criterion)</p> <p>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.</p> <p>Vacuum cleaners used in performing the service purchased during the Ecolabel award period shall meet:</p> <ul style="list-style-type: none"> • at least the energy efficiency class A+, • dust re-emission class A, • cleaning performance class A, <p>as defined in Commission Delegated Regulation (EU) No 665/2013.</p> <p>Assessment and verification</p> <p>The applicant shall make available to the CB for the entire duration of the service the list of vacuum cleaners used in performing the service and all relevant documentation referring to vacuum cleaners purchase as well as to their technical performances (e.g. invoice of vacuum purchase and product fiche according to Commission Delegated Regulation (EU) No 665/2013 (Annex III)).</p>	<p>Comment rejected. This criterion will be kept optional for the reasons stated above, moreover currently the availability of energy class A (class A+ does not exist) professional vacuum cleaners is very low and it cannot be expected that cleaning companies change their vacuum cleaners to class A ones right away.</p>

7.3. Annex C: Stakeholder feedback following November 2016 EUEB 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 remarks		
Market distortion worries	<p>"We also stress the remark of EFCI / FENI that we strongly disapprove the development of an EU Ecolabel for indoor cleaning services because we foresee strong difficulties with the practical implementation to the point of a distortion of competition, especially with regard to (public) calls for tenders.</p> <p>We fully agree with the EFCI / FENI comments. And we like to stress some points that are of particular interest for the German companies. We already have high standards regarding environmental protection in Germany that our member companies fulfil regularly. But we also have to hold onto the fact that there is no ecological benefit in something that can only be fulfilled by a very small number of companies and that has great impact on the competitiveness of our member companies."</p>	Comments acknowledged.
	<p>We foremost restate again that we strongly disapprove the development of an EU Ecolabel for indoor cleaning services because we foresee strong difficulties with the practical implementation to the point of a distortion of competition, especially with regard to (public) calls for tenders. Through the present position, we wish to draw attention to a series of elements that are of high importance to companies providing cleaning services in Europe.</p> <p>(other comments highlighted by the letter can be found in other sections below)</p>	
Link to GPP and German position	<p>"The Ecolabel for Indoor Cleaning Services is a mixture of criteria for services and criteria for service providers. In general, most criteria are for service providers. We will probably not use it in Germany.</p> <p>In general, we prefer the GPP criteria for services. The GPP criteria are</p>	Comment acknowledged. The EU GPP criteria are also being developed for this product group and will be published later this year.

	<p>part of the national “guideline of sustainable public procurement” from the “Allianz für eine nachhaltige Beschaffung“.</p> <p>http://www.umweltbundesamt.de/sites/default/files/medien/pdfs/bericht_der_beschaffungssallianz_bmwi.pdf</p> <p>It is more flexible as the Ecolabel, because it is like a toolkit. "</p>	
<p>EU Ecolabel mandatory because of tendering</p>	<p>"The overall cleaning market in Europe is highly competitive and characterised 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 should be 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. 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 therefore strongly challenge the argument of the Technical Institute in Seville, according to which the request of such an Ecolabel in tender documents would not be possible because of existing EU GPP criteria for cleaning services. As the GPP criteria are only voluntary and non-binding for public purchasers, we are on the contrary convinced that any future Ecolabel will requested by public purchasers - and this with a detrimental effect on cleaning companies."</p> <p>We finally strongly deny the argument that the proposed Ecolabel is a “voluntary instrument”. Indeed, whilst a standard is voluntary by nature, it has mandatory effects in practice. If a (public or private) client will request the proposed Ecolabel to be fulfilled within the execution of a given cleaning contract, this imposes a burden on cleaning companies in practice, as only those companies complying with the requested Ecolabel will have the possibility to submit an offer. As a consequence, all cleaning companies not complying with this Ecolabel will be de facto excluded ex ante from the given contract although they respect all legal requirements imposed on them.</p>	<p>Comment acknowledged. Procurers can specify criteria and state that if a company holds an EU Ecolabel licence then they are deemed as complying with the stated criteria but they also must accept other means of proof. Thus, a company holding an EU Ecolabel licence could have an easier time showing proof of compliance but companies not holding an EU Ecolabel licence could never be excluded from a public tender just for that reason.</p> <p>For further information on this issue, we invite the commentator to consult the EU GPP report and also the European directive on tendering.</p>

Preamble – scope and definitions

	<p>How to determine if outdoor cleaning is in or out is not clear and therefore difficult to verify. It is the term “any specialized” equipment that is not clear. We suggest writing specifically that outdoor window cleaning is not included.</p>	<p>Comment partially accepted. The terms related to glass cleaning have been updated to clearly state that only the cleaning of small glass surfaces are within scope. The term "specialised" equipment is kept in the scope to clearly delineate the cleaning of small glass surfaces with window cleaning – the main criteria for "specialised" equipment is that it's used by people who specialise in using it.</p>
<p style="text-align: center;">Window cleaning</p>	<p>"Article 1: [...]</p> <p>In the framework of this Decision, 'routine' refers to regular activities that are performed at least once a month, with the exception of glass cleaning, where 'routine' refers to regular activities that may be performed less frequently (at least once every <u>three</u> months)</p> <p>We prefer</p> <p>In the framework of this Decision, 'routine' refers to regular activities that are performed at least once a month, with the exception of glass cleaning, where 'routine' refers to regular activities that may be performed less frequently (at least once every <u>six</u> months)</p> <p>Background: Glass cleaning is not so often.</p>	<p>Comment rejected. The glass that is included in the scope is small glass that's commonly found in office areas and is similar to other hard surfaces in buildings and thus would be cleaned at a higher frequency than window cleaning. The note stating that the cleaning may be considered as "routine" if it is performed every three months instead of six months further differentiates it from the cleaning of large windows, which is performed much less frequently than the cleaning of small glass surfaces.</p>
	<p>The new term “glass cleaning when it is performed on indoor and outdoor glass” needs to be improved. While small indoor glass surfaces (e.g. mirrors) are covered by regular office cleaning, outdoor glass and window cleaning is not. Indeed, window and outdoor glass cleaning is done with special devices and cleaning agents are in a different (higher) wage group than office cleaners. We therefore demand to exclude the term “indoor and outdoor glass” and to replace it by “small indoor glass surfaces”.</p>	<p>Comment partially accepted. The proposed text has been amended to include the cleaning of "small glass surfaces", with the specification that no specialised equipment or machines shall be used.</p>
<p style="text-align: center;">Special products</p>	<p>It is not so straight forward to decide if a cleaning product is a special cleaning product or a routine cleaning product. Types of products used</p>	<p>Comment accepted. Specialised products are products which are not used in a routine fashion (less frequently than once a month). In case of</p>

	can vary a lot based on the types of surfaces present at the applicant (wood, concrete, carpet, etc). More guidance is needed. A long list of the different types of products used has been shared with JRC.	doubt, the company's procedures for cleaning/instructions for staff should be checked. An explanatory note will be added to the User Manual for the scope and Criterion M1.
Domestic cleaning	<p>"The scope and definition of the product group "indoor cleaning services" must be improved and further refined. This is absolutely necessary in order to clarify the boundaries to other similar activities.</p> <p>Although the term "private residences" has now been defined, this definition does not take into account the fact that cleaning companies provide business to business and not business to consumer services. Domestic cleaning in private residences is out of scope of professional cleaning companies. The market for private households is largely covered by undeclared work relationships between a private household and a person that cleans on his own account. In many countries, the tax laws also clearly distinguish between b2b and b2c services. Thus, the definition must be adapted accordingly."</p>	Comment rejected. While domestic cleaning services may not represent a large portion of services provided by professional companies, it is possible for a consumer to hire the cleaning services from certain companies, even if the majority is small or are auto-entrepreneurs (who are not all on the black market). Moreover, tax rebates are provided by some governments for the use for services at home, including cleaning services. Thus it is not proposed to exclude that segment of the market because of an apparent small representation in the current market.
Hospitals	The term "publically accessible hospital areas" is not feasible. In case the cleaning of a hospital is outsourced to a cleaning company, the hospital is cleaned in its entirety. On page 19 it is stated that "the areas designed as 'publically accessible' might differ from region to region or even hospital to hospital". This clearly acknowledges that a clear distinction is simply not possible. In addition, in Southern Europe also disinfection activities (that are explicitly excluded from the scope) are regularly carried out in hospitals on a periodic basis. Therefore, the implementation of this criterion is objectively not possible in practice and, as a consequence, "hospitals" must be excluded from the scope.	<p>Comment acknowledged. The aim of the scope is to indicate the general types of service that are within scope (routine indoor cleaning) and not to create a list of areas and things that can be cleaned. The mention of hospitals and the areas in the hospitals listed are provided as examples ["areas (...) may include, but are not limited to (...)]" and they do not attempt to make a general distinction between areas that can or cannot be cleaned in every hospital in the EU28.</p> <p>An explanatory note will be added to the User Manual to bring attention to the fact that the examples given do not constitute an exhaustive list.</p>
Preamble – who can apply		
Contracts vs service line	<p>Even with this third and modified draft we cannot agree with the overall approach that the whole business line "Indoor Cleaning" has to be covered to get the Ecolabel. It should only apply for single designated contracts. Like products companies can provide services with Ecolabel especially to customers that are interested. (...)</p> <p>[more text in file provided by the stakeholder]</p>	<p>Comments acknowledged. A contract-basis for the EU Ecolabel would not be possible because of how the scheme is structured and the relatively short length of most cleaning contracts.</p> <p>If a company chooses to offer EU Ecolabel and non-EU Ecolabel services, they can do that given the wording of the criteria.</p>

	<p>During the early stages of the project, several of us highlighted that it is essential to define who will be able to apply for the EU Ecolabel (e.g. whole companies, departments, single contracts) and how the verification process would work. Moreover, the issue of 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 was raised. Our position is that should be and follow the contract basis. Cleaning services are contract-based and the way the services are provided can vary between contracts and clients, cleaning services are predominately determined by clients.</p>	
	<p>We are aligned with the other stakeholders that stated that the EU Ecolabel should be awarded for cleaning service contracts , and we in Spain consider that, among others, all the mandatory criteria depends on the client premises, client collaboration, doing so the cleaning company only can be asked to apply for ecolabel in contract basis. With the current process that should be followed to be awarded the EU Ecolabel, the application process could only start once the contract has been signed. Moreover, in Spain we sign two years contract average, so is nonsense to ask for a company ecolabel but affirmative for a contract ecolabel licence or even for the experience of a company that have awarded several ecolabel in several contract basis similar to the procurement process.</p>	
<p>Clarification</p>	<p>I still don't fully understand to what the EU Ecolabel will be awarded. From my understanding a service line will be awarded with the EU Ecolabel. To my understanding this implies a large company can offer "routine cleaning services" with the EU Ecolabel and other types of cleaning services (like window cleaning) that won't be EU Ecolabeld because they are not part of the scope. But if the EU Ecolabel is awarded to a specific service line, this implies a company can offer their customers "green routine cleaning services" as service line or "conventional routine cleaning services" as long as they have separate accounting. It is highly likely this will be done because the cost for both types of routine cleaning will differ, the conventional routine cleaning will be cheaper. Those clients who impose the use of certain non-EU Ecolabeld consumables will most likely not go for the "green routine cleaning", they would chose the conventional routine cleaning</p>	<p>Comment acknowledged. The comment describes exactly the expected functioning of who can apply for the EU Ecolabel: a company can offer different types of services, as long as the EU Ecolabel service line is well separated from all other types of services.</p>
<p>Contract structure</p>	<p>Contracts of cleaning services contain, in addition to the maintenance cleaning, certain special cleanings, such as basic cleaning or disinfection</p>	<p>Comment acknowledged. The aim of the EU Ecolabel scope is not to include every single potential contract that a cleaning company might</p>

	<p>of certain areas. Such different work within a contract agreement would probably not be possible under the current criteria, which would increase the burden on the tendering authority.</p> <p>The question arises as to how ecolabel for indoor cleaning services should deal with contracts between the customer and the service provider, which include not only routine cleaning, but also basic cleanings, disinfecting measures or other indoor cleaning activities that are not covered by the scope of the Ecolabel.</p>	<p>have with a client but to highlight companies that offer a cleaning service that show environmental awareness. If a client requires disinfecting measures and other specialised tasks, then a contract with an EU Ecolabel indoor cleaning service line is not appropriate.</p>
Logo use	<p>I believe it should be made more clear what will be EU Ecolabeld (a type of service offered). A reflection should also be done on how the logo will be used. Will the logo be used at the license holders premises with a plate or flag as is done for hotels? Also if the applicant is offered other types of non-EU Ecolabeld cleaning services?</p>	<p>Comment accepted. The logo guidelines should be followed, if need be those guidelines should be updated to reflect the use of the logo for services. This issue will be brought to the CB Forum in March 2017.</p>
Survey results	<p>When was 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, we do not agree and they could not give us an example of a cleaning company that follow that suggestion, we consider that our point of view the cleaning companies point of view should be taking into account rather than others out of our market defending consulting or verification market far from our cleaning task day by day.</p>	<p>Comment acknowledged. Several companies were contacted as part of this project work and their responses were given weight in the writing of the criteria and of the report. It is impossible for the JRC to give other stakeholders the names of the companies contacted due to the anonymity that was promised during the interviews.</p>
Clarification	<p>As is written in the proposed 1.4.3. pg. 23. : “Competent Bodies shall carry out an on-site visit at the applicant’s premises and at least one on-site visit of the cleaning service being provided at a client’s premises before the award concession”. That means contract basis and should be licence for a company if keep the contract basis award ecolabel or multi- base.</p>	<p>Comment rejected. If a company has multiple clients (and contracts), the on-site visits can happen at any of the clients’ premises. The wording chosen (“at a client’s premises”) shows that.</p>
Separate accounting/service line	<p>“We strongly denounce the proposed specification for EU Ecolabel applicants. The terms “separate accounting” and “service line” are not feasible in practice, neither for the companies applying for the Ecolabel nor for their suppliers of cleaning products. These terms imply that both, the companies and suppliers, have to completely reconvert their accounting although only a small part of the services provided and the products supplied will fall under the scope. And all this only to prove compliance with a label, of which is unknown if it will be requested by</p>	<p>Comment acknowledged. The EU Ecolabel is a voluntary scheme and if a company does not believe its clients would be interested in third-party verified EU Ecolabel services, they should not apply.</p> <p>Concerning the accounting, if a Company uses software or has a system in place where they cannot easily keep track what is used for the EU Ecolabel service line, they will have to keep track separately of the products and accessories used (e.g. a folder and spreadsheet with invoices). The accounting does not have to be part of software. A simple</p>

	clients in the future.	accounting system will be described in the User Manual.
Company structure and expected results	<p>The development of the cleaning market over the last 15 years clearly demonstrates that nowadays there are only a few cleaning companies that only provide classical cleaning services. On the contrary, the portfolio of almost all cleaning companies includes the provision of a lot of other services up to the whole range of Facilities Management. Any eventual label has to take this fact into account.</p> <p>The proposed specification assumes that a company offers Ecolabel services within its portfolio while other services are provided without Ecolabel. It then becomes necessary to reconvert the accounting only for those services that fall under the scope in order to specify and to verify, which areas/worksites fall under an eco-labelled services provision and which do not. This leads to an immense bureaucratic effort that it difficult, if not impossible to manage for both, the identification of eco-labelled services and the verification of compliance by Competent Bodies.</p> <p>The existing Nordic Swan label for cleaning services in Sweden underlines this reasoning. This label is awarded to the company as a whole and even in this case actual figures demonstrate that it is nearly not used at all: From the existing 2.387 Swedish cleaning companies only 28 companies (1.2%) are certified with this label (http://www.svanen.se/en/Search-result/?productGroupID=43&searchType=4). Furthermore, this 1.2% of companies consists of only big and medium-sized companies. This clearly demonstrates that even in Sweden, where ecological aspects play a great role, 98.8% of cleaning companies do not have the financial and human resources to go through the certification process.</p> <p>In addition, the proposed specification will not lead to a reduction of the environmental impact. Either clients will not ask for such an Ecolabel or only a few big companies that can afford the additional costs will establish a subsidiary company to comply with the criteria. As a result, those few companies will not improve the environmental situation in a measurable way.</p>	<p>Comment acknowledged. The aim is not to create criteria (of the EU Ecolabel and Nordic Swan) that all companies can fulfil but rather to highlight the top ones that make efforts to reduce their environmental impacts</p> <p>The best outcome of the establishment of the criteria is for them to be a catalyser that helps spread environmental awareness. With this raised awareness, the number of companies interested should increase over time.</p>
New Zealand	As a consequence, it is of utmost importance that the Ecolabel for cleaning services is only awarded on a contract-basis and not to the entire cleaning company or on the basis of a separate accounting. This is the only possible way to exactly implement the criteria and to verify the	Comment acknowledged. The requirements set out in the EU Ecolabel Regulation and the way that the scheme functions in practice differ from the way that the New Zealand Ecolabelling Trust works. As such, the way

	compliance. The “New Zealand Ecolabelling Trust License Criteria for Cleaning Services” demonstrates that this is possible in practice.”	that the criteria are implemented cannot be directly copied.
A&V - Social aspects		
Social aspects verification	The added pre-requisite is very important for this product group. The wording and content is ok, but since this is not an actual criterion, several questions arise. How is this going to be verified in the application process? How is ongoing compliance going to be checked? And most importantly, how do we ensure the same level of verification in all member states. A solution could be a good explanation in the User manual. For better understanding, we suggest that a draft explanation (for this point only) from the User manual is also presented along with the final draft of the criteria.	Comment accepted. A proposal for the text to be included in the User Manual will be presented at the CB Forum in March 2017.
Sub-contractors	<p>“Are sub-contractors allowed to perform “routine cleaning” or does “sub-contractors” mean companies who offer complementary services such as car cleaning and laundry services? This is very important aspect that should be clarified because the use of sub-contractors that take on part of the routine cleaning tasks is very common. In case sub-contractors can be used to perform “routine cleaning” the sub-contractors themselves should also be awarded with the EU Ecolabel. Otherwise this could be a loophole and/or make the verification of the criteria very difficult.</p> <p>In case “sub-contracts” only mean companies who offer complementary services such as car cleaning and laundry services, that should be made clear.</p>	Comment accepted. As highlighted by stakeholders previously, cleaning companies sometimes prefer to use sub-contractors for tasks such as the cleaning of sanitary installations. Thus, a clarification has been added about how sub-contractors must be handled – they should also hold an EU Ecolabel licence to ensure that the cleaning services performed are of EU Ecolabel quality.
Further social criteria	<p>“Social criteria highly welcomed</p> <p>Consumers’ organisations and environmental NGOs fully support the social criteria proposed by the JRC. Social requirements are of high importance especially in this service group and it is crucial that the EU Ecolabel ensures good and fair working conditions of employees.</p> <p>The cleaning service company shall indeed fulfil all obligations concerning minimum wage - or collective agreements in the countries not having minimum wage-, pay taxes and social insurance.</p> <p>In case the cleaning services company is subcontracting its activities and uses the subcontractor’s control system, the EU Ecolabel requirements</p>	<p>Comment partially accepted. The text related to sub-contractors has been expanded but it is not proposed to copy the Nordic Swan approach as 30% of sub-contractor work is quite significant. To ensure that all the work performed is of EU Ecolabel standard and to facilitate verification, all sub-contractors are required to also hold an EU Ecolabel licence.</p> <p>Moreover, a requirement for insurance policy for all workers goes beyond the scope of the EU Ecolabel and, as such, is not proposed to be added.</p>

	<p>should ensure that the subcontractor also meets the same requirements. We appreciate that the current proposal takes this into account. In addition, we recommend including an obligation for all staff members to have an accident insurance.</p> <p>In the Nordic Swan criteria for cleaning services the following is required, which could further improve the proposal:</p> <p>The following applies in cases in which the applicant uses subcontractors for parts of the cleaning service or uses temporary workers to perform more than 30% of the cleaning work:</p> <ul style="list-style-type: none"> • The subcontractor or the temporary staffing agency must have an agreement with a trade union for its employees. • The subcontractor or the temporary staffing agency must be registered for VAT and employer's National Insurance contributions. • The cleaning must be performed by the subcontractor's own personnel. The subcontractor must not hire in a second subcontractor." 	
A&V – on-site visits		
Frequency	<p>"We support the AFNOR position, who wants to define a sampling rule in order to set limits to the number of audits to be realised</p> <p>We are not in favour of setting a yearly audit frequency for each company"</p> <hr/> <p>"We agree with AFNOR and ADEME, who wants to define a sampling rule in order to set limits to the number of audits to be realised</p> <p>We recommend not to set a yearly audit but a biannual one"</p> <hr/> <p>The EEB and BEUC welcome the requirement that on-sites visits are organised periodically under the validity of the license. We recommend setting a minimum frequency such as once per year. "</p>	<p>Comments partially accepted. As stated by the commentators, on-site visits are essential (before and after the awarding of an EU Ecolabel licence) but as the means available to the different Competent Bodies are different, it is proposed to keep the number of on-site visits during the validity period up to their discretion – this is in line with the current practices for the EU Ecolabel for Tourist Accommodations.</p>
Point system - general		
Mandatory vs optional	<p>"However, we found there were too many optional criteria compared to the mandatory requirements. The mandatory criteria should be the basis</p>	<p>Comment partially accepted. The state of the environmental market in the Nordic Countries is ahead of that of most of Europe. Some of the</p>

	<p>that covers all important areas from the LCA point of view. The license should only be awarded to companies who show a basic good environmental performance in all important areas. The optional criteria should be used to make the whole set of criteria more stringent but give the applicants flexibility.</p> <p>Based on our experience from the Nordic Ecolabel where 80% of the criteria are mandatory we know that most of the license holders would come up to 14p already after the optional criterion 5 and there are totally 12 optional criteria in the draft document. "</p>	optional criteria have been set as optional because SMEs might not have the resources necessary to fulfil them although it would be preferable for all companies to fulfil them (e.g. quality criterion)
Based on company size	I'm not sure if the criteria set is ambitious enough especially for large cleaning companies. Maybe it could be considered vary the number of points according to the size of the company.	Comment accepted. This type of idea is excellent for a future revision when more data is obtained on how companies deal with the criteria.
Low scoring criteria	The optional criteria scores points starting at two points. It will be more incentive to start at 1 point.	Comment accepted. The new scoring system has multiple criteria that start at 1 point.
Weighing mechanism	BEUC and the EEB have concerns regarding the three pillars that the JRC has used to define the mandatory criteria. Although we recognize the importance of the technical and economic feasibility, we hold the view that the environmental improvement potential should be the key factor when developing EU Ecolabel criteria. The potential environmental benefits should then count for at least half of the criteria development as the EU Ecolabel aims to reward the best environmentally performing cleaning companies. The economic and technical factors should be considered for the remaining 50% in drafting the mandatory criteria, so 25% each.	Comment acknowledged. The proposal already puts a weight of 50% to environmental issues (the other two issues are not split 25%-25% but rather 20%-30%).
Points required	<p>"Regarding the optional criteria set, BEUC and the EEB acknowledge the flexibility provided to the applying companies, which can work in different manners. However, the EEB and BEUC disagree with the JRC proposal to award the Ecolabel to companies performing only 14 out of the 45 points given by the optional criteria (31%).</p> <p>Compared with the 2nd technical report, the current proposal is less ambitious as the previous one required 40% of minimum points (6 out of 16 points), which was already far from sufficient. Achieving even less points (31%) of the whole optional criteria set is not ambitious enough. The proposed threshold fails to respond to the aim of the Ecolabel, which</p>	Comment rejected. As stated in the report, the % of points demanded compared to the total number of points available cannot be used directly as a signs of ambition. Indeed, it is possible to artificially raise that % with very easy criteria that all companies will be able to fulfil (and therefore get points) – such criteria belong in the mandatory set and not in the optional one.

	<p>is to differentiate the best environmentally performing companies.</p> <p>The argument that higher thresholds would leave out companies on the market is in contradiction with the objectives of the label: the EU Ecolabel should be awarded to the top 10-20% best performing cleaning services.</p> <p>"</p> <p>"In addition, such an approach would encourage companies, in a pragmatic way, to stick to the bottom line to be awarded the EU Ecolabel. With such low minimum requirements, there will be no incentives for companies to further develop environmental friendly practices and continuously make efforts to limit their environmental impacts.</p> <p>To be in line with the objectives of the label, BEUC and the EEB recommend raising the ambition level of the optional set to achieve a minimum of 60% of the points. "</p>	
Other general remarks		
Ecolabel list	<p>"Include list of ecolabels</p> <p>Regarding type I Ecolabel, it would be helpful to include a list of these ecolabels rather than have people search for them by themselves."</p>	Comment partially accepted. A list of the most well known ISO Type I ecolabels can be provided in the User Manual but it is impossible to provide a list of every single one available as new ones might appear on the market.
Wording	<p>Proposed assessment and verification (p. 23), can you precise "... after the awarding of the EU Ecolabel licence <u>to the cleaning company</u>, the applicant..."</p>	Comment rejected. The EU Ecolabel will be awarded to the company for a specific service line and the proposed wording might lead to misunderstandings.
EU Ecolabel for services	<p>It must be stated again that the project to develop an EU Ecolabel for cleaning services is treating for the first time a service provision. All existing EU Ecolabels concern the labelling of products. 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 both Ecolabels deal with static buildings/sites where the consumption of water, electricity etc. and the use of specific products etc. can be easily assessed. This demonstrates that the development of an EU Ecolabel for a specific service provision (e.g. indoor 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 Europe. This is even more the</p>	Comment accepted. Section 4.3 highlights the specificities mentioned by the commentator – indeed, establishing criteria for an EU Ecolabel for indoor cleaning services is complex due to the number of cleaning locations and clients.

	case because cleaning services are provided in the customer's premises and a lot of aspects with effect on the environment are out of cleaning companies' responsibility.	
M1: Use of cleaning products with lower environmental impact		
M1 applicability	<p>"Every cleaning company also has to provide indoor cleaning services for which you need cleaning products that do not fulfil this criterion, e.g. stain remover, spray for removing chewing gum, etc.</p> <p>In conjunction with the draft to involve all indoor cleaning activities of the whole company (in contrast to contract based as we demand) it's a physical impossibility to fulfil M1 with all of the indoor cleaning services range. At the moment only less than 10% of cleaning products purchased from cleaning companies in Germany carry the EU Ecolabel."</p>	<p>Comment rejected. Not all indoor cleaning services carried out by a company must be EU Ecolabel – indeed, a company may choose to also provide non-EU Ecolabel services, which then can use specialised products.</p> <p>As the EU Ecolabel is not aimed at all companies that provide indoor cleaning services, the fact that only 10% of the products used by companies are EU Ecolabel is not representative. Moreover, other ISO Type I ecolabels exist for cleaning products and they can also count towards the percentage in M1(a).</p>
M1 applicability	The criterion is not restricted to the Ecolabel service, but refers to the whole company. However, the criterion cannot be applied to all products of the company. Because, for example, basic cleaners and various other products which are not connected to cleaning according to EU ecolabel indoor cleaning service cannot fulfill these criteria. The criterion should refer only to the service with EU ecolabel indoor cleaning service. Or M1 (b) may only concern about 25% of the products.	Comment partially accepted. As with all the criteria, it is understood that "indoor cleaning services" concern the service line that's within scope and not the whole company (if there is a difference). In order to avoid any misunderstandings, "indoor cleaning services" is proposed to be changed into "EU Ecolabel indoor cleaning services".
M1 applicability – other services	It is not clear how the percentage of 50% cleaners with eco-labels used in connection with the EU ecolabel indoor cleaning service contracts can be legally protected if additional other services are provided in the company.	Comment acknowledged. The 50% concerns the products used as part of the EU Ecolabel indoor cleaning services not all the products used by the company – this has been made clearer in the opening sentence of the criterion.
M1(b) – Restricted chemicals	The use of cleaning chemicals has been identified as a hotspot in the technical report. But still 50% of the cleaning products are not regulated by the criteria. We suggest adding a requirement on non-ecolabelled products. We have previously sent a list of relevant substances that should not be permitted. This list of substances could also be the list from the newly voted criteria for hard surface cleaners. If the verification is a declaration from the supplier of the cleaning products, the extra administrative burden will only be very little but such a requirement will to a high degree increase credibility of the document. In Denmark we have 13 Nordic licenses for cleaning services. Here the chemical	Comments partially accepted. Sub-criterion M1(b) has been changed to reflect sub-criteria 4(a)(i) and 4(a)(ii) of the new criteria for the EU Ecolabel for Hard-Surface Cleaning Products. The User Manual shall contain declarations that are the same, in order to facilitate verification.

	<p>requirements are much stricter; hence we cannot see that our proposal will be a barrier for applicants.</p> <p>As mentioned earlier we want explicit focus on fragrances and preservatives of the isothiazolinone type, especially MI, CMI/MI. We suggest at least the same limits as in cleaning products for these i.e. 50 ppm and 15 ppm, respectively.</p> <p>In addition, as requested by Denmark, we ask for the inclusion of the “allergenic” risk class in the list of prohibited risk classes, in order to limit the health hazards for employees who manipulate the cleaning products. For information, such prohibition is already in place in the Nordic Swan, the Environmental Choice (New-Zealand) and the Australian Ecolabel.</p> <p>We would like to have a list of restricted chemicals.</p> <p>"We highly welcome the introduction of the hazard statements applicable to non-ecolabelled products. However, BEUC and the EEB recommend introducing additional requirements on the non-ecolabelled products in order to ensure their safety and sustainability. We suggest, in this respect, setting requirements aligned with the criterion on excluded or limited substances for Hard Surface Cleaners (HSC).</p> <p>Service providers should not be awarded the EU Ecolabel if they make use of non-environmental friendly products containing hazardous compounds. As many of the existing products available on the market cause damages to humans and the environment through toxic volatile emissions and water pollution, it is essential to ensure their strict exclusion from the EU Ecolabel for cleaning services. "</p>	
M1(b) – H412 classification	High concentrated cleaners are also used in commercial cleaning, which are classified with H412. The classification based to the high amount of active substance in the product. Therefore an exemption from prohibition of labeling with H412 should be introduced for high concentrated cleaners which do not have an Ecolabel if the total content of surfactant is > 25%.	Comment rejected. Several concentrated undiluted products are available on the market that do not include the H412 CLP label.
M1(b) – classifications	"To be consistent, the end of the first paragraph of M1(b) Hazardous Substances should read:	Comment rejected. The text refers to the final product classification and not to single substances – there are no final product classification derogations in the EU Ecolabel for Hard Surface Cleaners (only for IILD,

	... (unless a derogation applies to the respective Ecolabel)."	which do not fall within the scope of M1).
Pre-moistened mops	<p>It is not clear if the detergents that are used for the laundry (including impregnation and conservation) of mops (both internal and external) are included in "products directly used during indoor cleaning service operations".</p> <p>Please clarify what is meant by "pre-moistured product". Is the impregnation of the mops included? We think that it should be included.</p>	Comment accepted. If a product stays on the mop, the mop is considered as pre-moistened product and therefore must comply with Criterion M1. The User Manual will include a list of possible pre-moistened products.
Restricted chemical use	The allowed amount of chemicals that are used in cleaning should be restricted. It could be connected to the functional unit m2/ cleaned surface.	Comment rejected. Currently, the inclusion of such a criterion has been deemed as too burdensome as the other criteria on products are already strict.
Clarification of scope	<p>"Does this criterion apply to "routine cleaning products" or all the cleaning products used by the company/service line? In our view it is not always straightforward to decide if a cleaning product is for routine cleaning or not.</p> <p>What if cleaning products are bought by the client? This is very common for cleaning of private residences which are now part of the scope. In my view, clients which provide their own cleaning products should fall out of the scope. "</p>	<p>Comment accepted. The criterion only refers to products used as part of the EU Ecolabel service line and not by the whole Company. This has been further clarified in the opening line of the criterion.</p> <p>A clarification has been added to the scope stating that services for which the client provided the cleaning products are not covered by the scope.</p>
Ambition level	BEUC and the EEB recommend raising this requirement so that 70% of the cleaning products purchased are ecolabelled, instead of the currently proposed 50%. The detergents product group is very successful and it is not justified to demand such a low threshold. In addition, this is a mean to boost the uptake of EU Ecolabel products in the market.	Comment acknowledged. While the number of EU Ecolabel cleaning products is high, a large number of them as for consumers and would not be used as part of professional cleaning services. Moreover, the requirements set out in M1(b) have been increased.
Threshold	We fulfil it at this moment, but as I suggested at the brussels meeting, It is more difficult for us fulfil this point because six years ago we used a normal amount of products as any other cleaning company, but nowadays with the use of microfiber and water we have reduced that amount until a 15%. And now over that 15% obtained we have to work to obtain the 50%of ecolabel products.	Comment acknowledged. (clarification was obtained from the commentator on products are used and whether ecolabelled equivalents exist)

Threshold	We have to revise all our products with more detail, but I think It will not be a problem. So, We are able to fulfil it	Comments acknowledged.
	Yes, any company could afford to buy 50% of products with ecolabel (taking into account that the employees know how to dose them well). Likewise, any product should be free of risk of causing damage to human and environmental health	
Product availability	Although it is positive to note that the percentage of 50% for the criterion M1 (a) has been kept, it is not at all known how many cleaning products for professional use are available. The data set out in the technical report (page 32-33) are not complete and therefore not clear. The number of available products for professional use differs greatly amongst the 28 EU Member States. The argument that those products can also be "...ordered remotely, bought in bulk and delivered..." is counterproductive. This implies transportation across borders, which is not eco-friendly. Moreover, this would not be feasible, as technical specifications of the product need to be in the language of the country where the product is used.	Comment acknowledged. The difficulties in obtaining products listed in the comment are included in the rationale as to why the criterion threshold is kept at 50%. It also should be kept in mind that the EU Ecolabel is not aimed at all cleaning companies in the EU28 and it must be accepted that some might not be able to fulfil Criterion M1.
Concentrated product availability	Although the list of hazardous substances is now clearer for criterion M1 (b), there is still more expertise needed on the availability of non-toxic products. For certain applications, as for example periodic deep cleaning of floors, it is very difficult to get non-toxic substances. In addition, also for indoor cleaning it is once in a while necessary to use disinfectants. Finally, through this criterion, the use of high concentrated products will be impossible, as no professional cleaning product with an Ecolabel exists.	Comment acknowledged. If a client necessitates cleaning services that use specialised product, then an EU Ecolabel service is not for them. Concerning the availability of concentrated EU Ecolabel products, a quick catalogue search revealed that multiple brands offer such products (e.g. SealedAir's Pur-Eco line).
Assessment and verificatio	The assessment and verification process for both sub-criteria, will lead to an immense bureaucratic effort for both the cleaning company and the Competent Body. The provision of annual data and documentation for criterion M1 (a) as well as a declaration of compliance supported by safety data sheets for criterion M1 (b) does not necessarily prove that these products have been really used and respectively not used when executing contracts that fall under the EU Ecolabel.	Comment accepted. The A&V has been simplified to a minimum but it is not always possible to guarantee good service line performance with no justification. The aim of the on-site visits is largely to ensure that the products listed in the application dossier are really being used.
M2: Cleaning product dosing		

Wording	Add pre-filled capsules/caps	Comment partially accepted. Products which do not necessitate a specific dosing apparatus are not covered by this criterion – this includes products that are dosed via capsules. “Caps” has been added as part of the wording.
Location	In Sweden the dosing is often done centrally, therefore, the requirement on that the apparatus should be available “on each site” should be taken away. It is enough to require that it is made available.	Comments partially accepted. The wording of the criterion has been updated to reflect the fact that the dilution apparatus should be made available either at the cleaning sites or in a central location.
	It is unrealistic to have a dosage system at small cleaning sites. If such a dosage system is not installed or provided for by the client it must be provided for by the cleaning company. This is regularly not the case for small sites and therefore this criterion is not reachable for SME’s. As the aim of this criterion is to prevent over-dosing (page 35), it should be therefore more clearly specified that not the access to dosing and diluting apparatus is essential but the fact that the company uses diluted cleaning products.	
General information	We are able to fulfil it with minimal investment	Comment acknowledged.
General information	All products must have an appropriate dosage system	Comment acknowledged.
M3: Use of microfiber products		
LCA	Did you find any life cycle assessments between microfiber and other cleaning textiles that causes your ecological preference not only based on the assumption that cleaning with microfibers is leading to less consumption of cleaning products but also taking into account e.g. waste disposal of used fibers as well?	Comments accepted. At the time of writing no significant peer-reviewed LCA could be found specifically comparing microfiber and non-microfiber cleaning accessories, especially regarding the release of microplastics during the washing phase. This issue is currently studied closely and there are innovations that should hit the market in the upcoming years that would limit the impact of microfibre laundering (e.g. http://life-mermaids.eu/en/research/technologies/) Nevertheless, the empirical evidence of the lower product and water use cannot be ignored, as was published both in the cited UNEP study but also in other studies such as the one performed at the the University of California Davis Medical Center (UCDMC) (http://www.epa.gov/region09/waste/p2/projects/hospital/mops.pdf). Moreover, the higher cost of microfiber products leads companies to caring for them and extending their lifespan as much as possible –
	Gibt es hier ein LCA?	
	"It is positive to note that the percentage of 50% has been kept because microfiber products cannot be used for all cleaning tasks, such as in cleanrooms or for periodic deep cleaning of floors. Except the cited UNEP study from 2008 (page 37), there is no evidence given that microfiber accessories are advantageous to other tissues. More expertise is needed on the benefits of using microfiber products, such as	

	<p>life-cycle analysis.</p> <p>The assessment and verification process for the use of microfiber products is not possible, only the purchase of these products. At what point in time this has to be proven and how can this be verified by the Competent Body? If anything at all, verification of this criterion is only possible in case the Ecolabel is awarded on a contract-basis!"</p>	<p>making them all the more interesting from an environmental point of view.</p> <p>Concerning the assessment and verification, it is to be done on the amounts of products used annually.</p>
Other impacts	<p>Criterion O3 (and M3): about microfiber products, Denmark would like to raise the flag that there is an issue about using microfiber cloth and microfibers in the aquatic environment. Is it possible to set a requirement to ensure that the microfiber cloths used does not emit micro plastic when used?</p> <p>"Consumers' organisations and environmental NGOs see many benefits of using cleaning textiles made of microfiber:</p> <ul style="list-style-type: none"> - They improve the cleaning performance and allow a deep cleaning. - They help reducing the contribution to the waste stream and the use of water and harmful chemicals, compared to other cleaning materials. - They help reducing cross-contamination risks, which is of high importance in areas such as hospitals. <p>We are however concerned about the new information that microfiber yarn generally shed more than filament yarn , and that fibres released by washing of clothing might be an important source of microplastics present in aquatic habitats . The Commission should assess whether this criterion should be kept. Reduced chemical consumption due to the use of microfibers needs to be compared against the possible emissions of microplastics."</p>	<p>Comments accepted. The issues of impacts of washing microfibers on marine life have been in the news recently and should not be ignored. Currently no test could be found that would ensure that microfiber products release limited amounts of fibres into the environment. This issue will be marked as of high important for the revision of the criteria.</p>
General information	<p>We think that the percentage indicated (50%) is appropriate.</p> <p>We fulfil at this moment to 95%</p> <p>Yes, the microfiber material has a similar cost to the rest. Any company can adopt this criterion.</p>	<p>Comments acknowledged.</p>

M4: Staff training		
Applicability	<p>We plead to change the wording so that the staff has to be trained only with regard to relevant criteria. E.g. not all staff is handling waste. So this staff would not have to be trained in waste handling.</p>	<p>Comment accepted. A clarification has been added that the requirements are for staff performing the EU Ecolabel cleaning services and, for each staff member, only the areas of training to their tasks should be covered by their training.</p>
	<p>Training is carried out very differently all over Europe and this has to be taken into account. The cleaning industry in Europe employs people from more than 100 different countries, so it is obvious that each training session provided is a heavy task for the employer. It requires time and (human and financial) investment and directly translates into cost.</p> <p>It must therefore be clearly stated that each employee performing EU Ecolabel cleaning tasks must only be trained regarding his concrete tasks of the service provision. It makes no sense and increases the company costs' disproportionately to train an employee on all areas enumerated if the tasks of this person include only some of these areas.</p>	
Water temperature	<p>"Energy saving": Staff shall be trained to use no heated or warmed water but according the manufacturers instruction. Background: In Germany water coming from cold water taps is about 8°C (for hygienic reasons) cold not "room temperature". If there is only a cold water tap available "room temperature" would mean to heat the water before use. That sure isn't what the Ecolabel is aiming for.</p>	<p>Comments accepted. In order to avoid any confusion, the term "unheated" is proposed to be used. The User Manual will specify that this means whatever comes out of the tap on the coldest setting.</p>
	<p>Energy saving through the use of "room temperature water" needs to be reformulated. The term "room temperature" is not feasible, as it means between 17-20 degrees. The temperature of water available at cleaning sites is never as high as room temperature but rather at 8-13 degrees. In case the term is not reformulated, the cleaner has to let the tap water running until the temperature increases to the higher temperature. This is certainly not an energy saving behavior.</p>	
	<p>"Energy saving:</p> <ul style="list-style-type: none"> — Staff shall be trained to use room temperature water for diluting products, unless otherwise specified by the product manufacturer. <p>Der Text sollte wie folgt geändert werden:</p>	

	<p>Energy saving:</p> <p>— Staff shall be trained to use no hot water for diluting products, unless otherwise specified by the product manufacturer."</p>	
Waste criteria	<p>"Waste": Staff shall be trained to collect, separate and dispose waste...": Out of hygienic and health reasons in no way it is a task of the cleaning staff to separate mixed waste that once was dropped into one bin. This has to be expressed accurately.</p>	<p>Comments accepted. A new wording is proposed that specifies that the training on waste management should cover the requirements set out in the criteria on waste.</p>
	<p>Waste disposal is only rarely the task of cleaning staff. Therefore the wording must be changed by stating that the handling of waste should be done according to the local and national regulations and according to what is foreseen at the client's premises.</p> <p>Reference to the disposal of hazardous waste needs to be better defined, as the disposal of hazardous waste is hardly within the scope. Mentioning batteries as an example does not give enough clarity. It is therefore important to exactly determine to what kind of hazardous waste this is referring.</p> <p>Finally, it is not acceptable that a cleaner is required to separate waste that has been already collected and put in a garbage bag. In no way a cleaner can sort something out of a garbage bag."</p>	
Training delay	<p>"Adequate training shall be provided... within four weeks of starting employment.": Please change that into "within three months". E.g. there is staff that only works one or two days a week (e.g. weekend shifts in 7-days-a-week-contracts).</p>	<p>Comments partially accepted. As training is an essential part in guaranteeing that the services provided are of good quality, as required by the EU Ecolabel Regulation, the delay in training cannot be extended to a much longer period. As a compromise, it is proposed to extend the delay to six weeks but keeping the annual update, which does not have to go into the detail of the initial training.</p>
	<p>The requirement to provide adequate training to all new staff within four weeks of starting employment is not at all feasible. The timeframe must be increased to three months. Otherwise this would lead to a massive exclusion of SME's.</p> <p>Finally, the requirement to update the staff on all the areas outlined in this criterion at least once a year is much too demanding. This does not take into account that legislation updates or technological developments take place on a larger time frame than 12 months. The frequency of staff training shall be therefore changed to every 2 years."</p>	

	<p>"Industry stakeholders have informed me that 4 weeks isn't sufficient</p> <p>"NGOs fully support the criterion proposed by the JRC. It is important that the new staff members are trained within 4 weeks after their starting date so that they can incorporate best practices and behave in a responsible manner as soon as possible.</p> <p>We agree that staff should be updated once a year on the environmentally friendly practices at work."</p>	
Temporary staff	<p>Temporary workers have to be treated differently from permanently employed staff. Those hired for just a short time assignment cannot be treated equally to permanent employed staff. In Belgium for example, the temporary employment sector is responsible for the training of temporary workers. Temporary staff is mainly only required in peak times, such as holidays. Therefore an initial training of 3-4 hours must be sufficient.</p>	<p>Comment accepted. A clarification has been added to state that if a temporary staff member has received adequate training in the year preceding employment and they can prove it, then are not required to follow another full training.</p>
Staff from another company	<p>In case of a transfer of undertaking (Directive 2001/23/EC), the staff is already working at the client's site and is already trained. It is therefore important to maintain the rule that no retraining is anymore required in these cases.</p> <p>Reading the criterion I understand that new staff should get a complete training on the listed topics within 4 weeks. Existing staff should get a yearly update.</p> <p>I don't fully understand what has to be done in case staff is taken over from another company.</p> <p>Staff member A received a full training when he started 5 years ago and received annual updates in the later years, which have been recorded and proven. When the contract is taken over by the EU Ecolabel license holder, should he get an update in that year? When I read the text it looks like nothing has to be done, not even an update that year.</p>	<p>Comments acknowledged. In the case of a company takeover, no initial training is necessary if it can be proven that the staff member has received training the year preceding the takeover.</p>
A&V wording	<p>Assessment and verification: "number of staff": not the number but records of which staff member has followed which training in which year should be provided. "</p>	<p>Comment accepted. The wording has been updated.</p>

General information	We fulfil part of the criterion and the rest we are able to fulfil with a minimal medium investment	Comment acknowledged.
General information	With an own or external training plan, any company can get well-trained employees	Comment acknowledged.
M5: Basics of an Environmental Management System		
SME considerations	M5 is way too ambitious to be fulfilled by SME!	<p>Comments acknowledged. The EU Ecolabel should be open to SMEs as much as possible but it should make sure that companies applying have an overall environmental approach to their indoor cleaning service. As such, it is necessary for them to establish an environmental policy and have an action plan in order to avoid any possible greenwashing.</p> <p>Criterion M5 does not require the documentation necessary for EMAS or ISO14001 and does not require any external auditing and should not constitute any burdens besides the initial establishment of an environmental policy.</p>
	This criterion is still too binding for SMEs, it should be optional	
	Frage: Ist das Kriterium auch für kleinen Unternehmen wirtschaftlich tragbar oder führt es indirekt zu einer Marktdiskriminierung? (Question: Is the criterion economically viable even for small businesses or does it lead indirectly to market discrimination?)	
	"For the sake of SME's, we strongly object criterion M5. There must be a much clearer distinction between criterion M5 and the optional criterion O7. The M5 requirement of having implemented an environmental policy, a precise action programme and an audit process (including client comments and feedback) is much too demanding, especially for SME's.	
	There can be therefore no doubt that the majority of the companies in the cleaning sector will be thus excluded from the Ecolabel, as it is made of mainly SME's that do not have the human and financial resources to meet this criterion. Furthermore, the M5 criterion is only possible for the entire company, not for a financial profit center, a service line or a single contract.	
The difference between criterion M5 and criterion O7 is so small that it's a much too high burden for SME's to comply with criterion M5. Therefore, either the requirements in the M5 criterion must be strongly lowered or the whole criterion needs to be classified as optional and merged with criterion O7.		
Finally, also O7 is impossible to reach for SME's. Only some of the big companies have an EMAS scheme and only some middle-sized companies have an ISO 14001 standard. But there is no small cleaning company that has these certifications. As a consequence, this criterion is		

	equally not acceptable."	
Internal auditing	It is suggested the use of internal auditors qualified according to UNI EN ISO 19011:2012 standard.	Comment rejected. The hiring of an staff member accredited with such a certification might be out of reach of SMEs.
Wording	To align the criterion with the Tourism accommodation services criteria, we shall recommend an "internal evaluation" rather than an "internal audit"	Comment accepted. The wording of the criterion has been updated.
General information	We have ISO 14001	Comment acknowledged.
General information	With an own environmental management plan or external service that also carry out the audit, every company must have an environmental management plan	Comment acknowledged.
M6: Solid waste sorting at the applicant's premises		
Link to M5	To the best of our understanding, this requirement is redundant. In M5 the applicant shall introduce a basic environmental management system. In M5 waste sorting is specifically mentioned as an example of a point which could be on the action plan. We cannot see how waste sorting could be left out of such an environmental action plan. We suggest erasing M6.	Comment partially accepted. While the current wording of M5 does not list waste management, many companies would put it as a point to focus on. As such, in future revisions of the criteria, if it observed that waste management is included in the environmental policy, M6 could be removed.
Removal of recycled material	We support the BEUC position regarding the collection of recyclable waste by the cleaning company in case of missing sorting bins at the cleaning site. For information, this requirement is already in place in several national labels (Nordic Swan, Green Seal, Australian Ecolabel and Environmental Choice). At least this point should be an optional criteria.	Comment rejected. For hygienic and security reasons, staff should not be asked to transport waste from the cleaning sites. As a note, Nordic Swan no longer lists such a requirement in their updated criteria.
Extension proposal	"In the current proposal, only waste generated at the premises of the applicant is covered by this criterion. We think it is much more important to cover the waste generated at the client's premises as the volumes would be of higher environmental importance. Solid waste should be sorted into the waste stream categories provided at the client's premises. However, in case hazardous waste such as low energy bulbs, paints, electronic devices, cannot be collected at the premises, the cleaning service company could get extra points if they	Comment partially rejected. Extra points cannot be awarded to a company in case they offer to deal with hazardous waste or with sorting waste, as it would be a service outside the scope of the EU Ecolabel.

	offer this service in case it is not available at the client's premises. BEUC and the EEB consider that it would be very beneficial to require more waste fractions from the company than the ones existing at the clients' premises. Since the clients cannot always decide which waste fractions they implement in their buildings or houses, the ecolabelled company could offer efficient and complete waste sorting. "	
General information	We follow without local waste management (also included in ISO 14001)	Comment acknowledged.
General information	Every company must have at least one classification plan of waste generated by itself and separation of waste to their respective containers	Comment acknowledged.
General information	It is positive to note that is now clearly stated that criterion M6 covers only waste generated at the premises of the applicant, whereas criterion O8 covers only waste generated at the premises of the client, whenever the client provides the means for cleaning staff to sort waste into relevant solid waste streams. It would be in addition important to expressively state that compliance with criterion O8 is only possible if the client participates / collaborates with the cleaning company. Finally, the reference to local or national waste management practices must be kept in any case for both criteria.	Comment acknowledged.
O1: High use of cleaning products with lower environmental impact		
Product availability	As we also learned from our competent body, the German Umweltbundesamt, these percentages are barely to fulfill. Or do you have any knowledge that there are enough products being available in Germany to fulfill this criterion?	Comment accepted. Many companies (including large ones such as SealedAir) already provided EU Ecolabel professional grade products in Germany covering all aspects of indoor cleaning.
Clarification	Criterion O1 should only be referred to routine cleaning at the EU ecolabel indoor cleaning service contracts as main service. Because there are no criteria for special cleaning products, e.g. intensive cleaners.	Comment accepted. A clarification has been added, as for M1, that only EU Ecolabel services are covered by the percentage threshold.
	(p. 47) This only concerns routine cleaning products?	
Product availability	Question: How is it ensured that there is a sufficient range of eco-labeled products to meet the criteria in the long term?	Comment accepted. It is impossible to predict the future availability of professional grade products. Currently multiple companies manufacture such products (e.g. Chrisal, Diversey) and, if the law of the market were to

		be followed, demand should result in an increased availability. Also it should not be forgotten that other ISO Type I ecolabels are also accepted.
Requirement fulfilment	We are to fulfil to 75% easily, and 95% with a medium effort. If our reduction in products replacing water were taken into account we would already fulfilled to 95%	Comments acknowledged.
	Yes, it does not imply a change in the investment in products	
Percentage	We strongly doubt about the possibility to reach the percentages of 75% and 95% in criterion O1. It is therefore of utmost importance to lower the thresholds or to add a third threshold of 51%-74% and to allocate 1 point to this third threshold.	Comment accepted. 1 point has been added as an option for companies that do not fulfil 75% but still use more than 50%.
O2: Use of concentrated undiluted cleaning products		
Multiple dilution rates	“...minimum dilution rate...”: A lot of cleaning products do have a standard recommended dilution rate of 1:100 or 1:200. But the instructions usually also state that in case of persistent soilings a lower dilution rate or the undiluted product should be used. Do products with instructions like this (which is true for most of the products) fulfill this criterion as well? Otherwise the applicant will not be able to find enough products to fulfill all cleaning tasks in indoor cleaning.	Comments accepted. The A&V text stipulates that for such products the applicant shall state the most commonly used dilution rate, as justified by internal staff instructions. Thus, if the product is mainly used diluted, it can be counted towards this criterion.
	Sanitary cleaner: today mostly one product will be used to clean all bathroom interior. These sanitary cleaners will be used undiluted inside toilets and urinals and diluted for all other surfaces in bathrooms. Do those cleaners fulfill the criterion? Other than this companies will barely be able to find suiting products.	
	Furthermore, it is not clear how to deal with e. g. sanitary cleaners in the documentation, which are used diluted as a sanitary cleaner and used undiluted as a toilet cleaner as well.	
	Although the terms “concentrated” and “undiluted” have now been defined, there is still confusion between both terms. Regarding concentrates, the overdosage is a much bigger problem. The standard dilution rate for sanitary cleaning products is 1:100 or 1:200. In addition, it is stated on all products that they shall be applied at a higher dosage	

	<p>or even undiluted in case of persistent contamination.</p> <p>Finally, it is nearly impossible to assess and verify whether a product has been used undiluted or diluted. Here again an immense bureaucratic effort is needed to provide documentation on the dilution rate of each product used when executing contracts that fall under the EU Ecolabel."</p>	
Clarification	<p>"The criterion should be applied exclusively to the products used directly within the framework of the EU Ecolabel indoor cleaning service to delimit other activities under the contract.</p> <p>Only products directly used during indoor cleaning service operations are covered by this criterion.</p> <p>The text should be amended as follows:</p> <p>Energy saving:</p> <p>Only products directly used during EU Ecolabel indoor cleaning service operations are covered by this criterion.</p>	Comment accepted. The text has been clarified to state this.
Definition	<p>Please clarify the wording. We don't understand how to interpret the "dilution rate".</p>	Comment acknowledged. The dilution rate is the ratio provided by the manufacturer at which the product is best used. This point will be discussed with CBs to see if it needs to be included in the User Manual.
Clarification	<p>This only concerns routine cleaning products?</p>	Comment accepted. Yes, only products that would be used within the scope of routine indoor cleaning products.
Product availability	<p>"This criterion is not compatible with criterion M1 (a) EU Ecolabel and other ISO Type I ecolabel products</p> <p>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.</p> <p>It is not necessary that the cleaning products awarded with the EU Ecolabel being concentrated cleaning products, because there is not any criterion that sets a maximum dilution rate.</p> <p>In fact, we have checked the cleaning products awarded with the EU</p>	Comment partially rejected. Multiple companies that sell products on the Spanish market have EU Ecolabel licences outside of Spain and offer suitable products.

	<p>Ecolabel in Catalonia and the companies usually have some concentrated products, but the dilutions are between 1:20 and 1:40.</p> <p>We believe that it is necessary that a minimum percentage of EU Ecolabeled products could fulfilled the dilution rate, for that, we propose to increase the maximum dilution rate to 1:20."</p>	
Product availability	At least 50% (2 points) and 75% (3 points) by volume at purchase of all cleaning products used per year should have a minimum dilution rate of 1:80. This demand is achievable in the light of the growing number of concentrated products available in the market, especially in the professional sector.	Comment accepted.
General information	Nowadays this criterion is difficult to fulfil for us. We would have to rethink some parts of our processes. but we do not discard that this change could lead to an improvement in our company	Comment acknowledged.
Expenses	If it does not involve a large variation of expenditure, and in the long term with standardized doses, it will exist a significant reduction of product	Comment accepted. Undiluted products, when used, tend to lower costs for companies.
Threshold	"Although it is positive to note that the percentage of 30% has been kept, a second percentage of 50% was added. This will not be reachable by SME's. It is in any case important to add a third threshold below 30% and to allocate 1 point to this third threshold.	Comment accepted. A third threshold has been added covering 15-29%.
03: High use of microfiber products		
General information	We fulfil at this moment to 95%	Comment acknowledged.
General information	Yes, the microfiber material has a similar cost to the rest. Any company can adopt this criterion	Comment acknowledged.
Threshold	We strongly doubt about the possibility to reach the percentages of 75% and 95%. It is therefore of utmost importance to lower the thresholds or to add a third threshold of 51%-74% and to allocate 1 point to this third threshold.	Comment accepted. A third threshold has been introduced.

04: Use of cleaning accessories with lower environmental impact

Product availability	<p>"Do those products exist? We doubt that and in Germany we only find a small number of those.</p> <p>When referring to products from other countries: please keep in mind that transport through all Europe is no ecological alternative."</p>	Comment accepted. The relatively high number of points awarded acknowledges that these types of products are not yet ubiquitous on the market.
Threshold	We are in favour of an increase of the minimum thresholds for the use of ecolabelled cleaning accessories above the current 50% for mops and cloths.	Comment rejected. Current limited availability makes it impossible to increase the percentage.
Product availability	Question: No mops nor cloths could be found on an internet search at http://ec.europa.eu/ecat/category/en/14/textile-products . Are there sufficient supplier?	Comment accepted. There is at least one EU Ecolabel supplier that is known to JRC and other ISO Type I ecolabels also have some licenced companies.
Points awarded	<p>The percentage of 50% for eco-labelled mops and cloths is not feasible, as it is not at all clear how many eco-labelled mops and cloths are available. This is explicitly recognized by the report on page 53 where it is stated that 1.162 EU Ecolabel textile are products available, without indication how many of those can be used for cleaning services. Relevant data is therefore lacking and needed. The percentages must therefore be lower than 50%. Finally, this criterion is not proportional: although the use of eco-labelled mops and cloths has only a limited impact on the environment a maximal score of four points can be achieved.</p>	Comment accepted. No specific data is provided in the report as it was not possible to obtain data on the matter. The high number of points reflects the fact that companies will have to make significant efforts to obtain such products – indeed, in the scoring, we do not only take environmental potential into account but also economic and technical feasibility.
	High number of points compared with the environmental savings. Supplies have a high impact but this criterion is only about a very specific subset of the total amount of supplies used.	
Thresholds	<p>"02 (a) Mops (2 points)</p> <p>It would be better to lower the % requirements as there are not many certified mops currently in the market place."</p>	Comment accepted. An intermediary threshold is now proposed of 20%.
Correction	"The number of points that this requirement can generate is missing.	Comment accepted. The numbering has been corrected.

	We think that there is a printing error: the numbering of the part requirements should be O4a and O4b instead of O2a and O2b."	
General information	We would have to revise our products with more detail and investigate or look for providers	Comment acknowledged.
Costs	Yes, the microfiber material has a similar cost to the rest. Any company can adopt this criterion	Comment acknowledged. There might a misunderstanding about what is covered by the criterion – the product must not only be microfiber but also hold an ISO Type I ecolabel licence.
06 (now 05): Energy efficiency for vacuum cleaners		
Time of applicability	<p>According ecological logic this criterion could only be applicable for replacement reserve or new acquisitions but not principally at the date of the first assessment. Otherwise the applicant would have to replace perfectly intact products who’s fabrication needed a lot of resources, energy, and water.</p> <p>And we ask for adding as follows: “...shall meet class A...” as valid at the time of purchase (because the thresholds vary over time).</p> <p>In general, this criterion should only be valid for new purchases.</p> <p>The under O6 formulated criteria only focus on energy efficiency. Particularly in the context that vacuum cleaners are used several hours daily criteria such as “dust pick-up on carpet and hard floor”, “dust re-emission” and “noise emissions” should be included under the criterion O6.</p> <p>Furthermore, the energy class requierments applicable at the time of purchase should be taken as a basis.</p>	<p>Comment partially accepted. The EU Ecolabel cannot be awarded on the promise of following requirements for future acquisitions; as such it is not possible to set another requirement.</p> <p>The criterion requires a certain class of vacuum cleaners and that class ranking takes into account dust pick-up and dust re-emission as part of the overall calculation.</p> <p>The wording has been amended to state that the vacuum cleaning shall be class A at the time of purchase.</p>
Mandatory vs optional	Energy is one of the hotspots and furthermore vacuum represent 50% of energy consumption. In an environmental point of view it would be relevant to move this criterion in the mandatory criteria. Furthermore the products are available on the market and they have good performance so these are not a barrier for companies.	Comment partially accepted. The criterion is not mandatory as, if it were, it would force some companies to completely renew their vacuum cleaner stock, which would also cause huge environmental impacts. Further, it should be noted that professional cleaning companies have a much more restricted market than consumers.

	First of all it would be necessary to check the cost of this product to assess if it is achievable in an economic point of view.	
Calculation	It should be indicated that in case of a round value (for example 30% of 3 vacuum= 0,9 vacuum) it must be rounded off in the superior value.	Comment accepted. The wording has been clarified that the value should be rounded up.
Threshold	<p>BEUC and the EEB find that the ambition level of the criterion proposed is far from sufficient. It is only required that at least 30% of the vacuum cleaners owned or leased by the applicant and used in the provision of the cleaning service operation meet class A on energy efficiency. We rather recommend requesting that all new vacuum cleaners bought or leased by the applicant meet the top class for energy efficiency as defined by the EU Energy Label. This can be verified through invoices and technical data sheets.</p> <p>Furthermore, we encourage the JRC to include this criterion in the mandatory criteria set.</p>	<p>Comment partially accepted. The EU Ecolabel cannot be awarded on the promise of following requirements for future acquisitions; as such it is not possible to set another requirement.</p> <p>The criterion is not mandatory as, if it were, it would force some companies to completely renew their vacuum cleaner stock, which would also cause huge environmental impacts.</p>
Price of vacuum cleaners	We are able to fulfil with a medium-high investment. As far as we know the price of these vacuum cleaners are much more expensive comparing with no class A vacuum cleaners and furthermore there is not a wide catalog	Comment acknowledged.
Fleet replacement	It would not be possible to renovate the complete vacuum cleaner fleet. If, at the time the company needs to buy new equipment, it must be classically efficient.	Comment acknowledged.
Fleet replacement	It is positive that this criterion was kept optional. However, the percentage of 30% is only feasible if it is clarified that the percentage only concerns a future replacement purchase of vacuum cleaners. It is absolutely unacceptable and goes against any environmental and economical reasoning to force cleaning companies to replace their existing vacuum cleaners by those falling under this criterion. This would be an immense waste of	Comment partially accepted. The EU Ecolabel cannot be awarded on the promise of following requirements for future acquisitions; as such it is not possible to set another requirement. It has been kept optional as not to force companies to change their fleet right away.

	resources and would represent the opposite of being eco-friendly. It is therefore unconditionally necessary to respect the depreciation period of each vacuum cleaner in use and, as a consequence, to only foresee a compliance with this criterion from the time when a new vacuum cleaner is purchased.	
07 (now 06): EMAS registration or ISO 14001 certification of the service provider		
Point attribution	Criterion 07. It seems rather high with 5 points for environmental management, e.g. in comparison with C9, quality 2 points.	Comment acknowledged. The primary focus of the EU Ecolabel is environmental performance and, as such, preference is given to EMAS and ISO14001 in terms of points.
TA alignment	The number of points for EMAS and ISO 14001 is not aligned with the tourism accommodation services criteria. It should be corrected if there is no reason for this choice.	Comment accepted. The difference in points between EMAS and ISO14001 has been set to the same as for Tourism Accommodation.
Point attribution	The number of points given for EMAS 5p and ISO 14001 4p is disproportionally high in relation to the total number of points required which is 14. Especially, when there is already a mandatory requirement on quality system and procedures in place.	Comment partially accepted. The high number of points reflects the costs and technical difficulties that are necessary to obtain a third-party certification.
General information	We fulfil at this moment	Comment acknowledged.
SMEs	It would not be possible for a small or medium-sized enterprise to align itself with EMAS (high cost versus economic benefits). If, in the case of having an external service that allows it to be aligned with EMAS, the expense is accessible to any company	Comment accepted. The high number of points reflects the high costs of a certification.
08 (now 07): Solid waste management at the client's premises		
Mandatory vs optional and extra services	We agree that solid waste should be sorted into the waste stream categories provided at the client's premises. However, we recommend including this requirement in the mandatory set of	Comment partially rejected. The areas for which points are awarded are based on the scope of the service – collecting and sorting hazardous waste a specific service outside that scope.

	<p>criteria as waste sorting is of high importance from an environmental point of view and contribute to lower the environmental impact of the company.</p> <p>Besides, if hazardous waste, such as low energy bulbs, paints, electronic devices, cannot be collected at the premises, the cleaning service company should be able to provide this service and collect them. In the current proposal no efforts (except training) are made on the hazardous waste fraction.</p>	The criterion cannot be made mandatory as not all companies hold the weight to negotiate how waste is handled on cleaning sites.
General information	we fulfil at this moment if the client ask us.	Comment acknowledged.
General information	<p>No, if the waste treatment is intended beyond its classification (need for equipment and facilities with high cost).</p> <p>If, as regards the separation of types of waste (paper and paperboard, batteries, plastic ..) for recycling or treatment in each container (it does not involve investment in equipment, it means "low" investment in the time spent) .</p>	Comment acknowledged.
09 (now 08): Quality of the service		
Point differentiation	<p>We think this is an important requirement. But the present wording should be changed. Most importantly, it does not serve any purpose to exclude companies with environmental systems in place from achieving points here. If the purpose is to promote quality systems, we suggest putting emphasis on this. A suggestion could be:</p> <ul style="list-style-type: none"> • Basic quality system for the cleaning service (2 points) - the requirement as described • An 3rd party verification of the cleaning system (3 points), eg ISO9001 or Nordic INSTA 800 	Comment accepted. The first sentence of excluding ISO14001 certified companies has been removed and a point differentiation has been introduced.
Link to 07	The documentation is essential assessment and verification. In order to avoid discrimination against criterion 07, 4 points should	Comment partially accepted. A higher level of points is proposed to be awarded if a company holds a certification but a quality certification

	also be possible.	cannot be put on the same level as environmental certification.
Quality check	Our experience from the Nordic Ecolabel is that component "Quality (e.g. expected cleanliness, standardised checklist)" in the work instructions list is regulated by the contract between the cleaning company and their client and is not steerable by Ecolabelling. The component can, therefore, be deleted	Comment acknowledged. This line was introduced in order to ensure that such an agreement exists between the client and applicant and does not aim to regulate it.
General information	it's not applicable to us	Comment acknowledged.
General information	Any company must have a person in charge of controlling the good performance of the services and compliance with the agreed procedures	Comment acknowledged.
Quality vs environment	<p>Compared to the previous report, the content of this criterion remains the same although the title has been changed. The content still assumes that several elements of a quality management system are needed in order to fulfill this criterion. Therefore it remains incomprehensible why this criterion was added to the list of criteria, as a quality management system has nothing to do with the environment. It should be therefore removed.</p> <p>This criterion is also not feasible, as SME's will not be able to comply with it. Especially small companies will not have the human and financial resources to implement a quality management system that includes all the different aspects enumerated. In this regard, it must be acknowledged that SME's are doing a lot for protecting the environment even without having those requested schemes or standards implemented (EMAS, ISO, Quality Management, etc.).</p>	Comment partially rejected. The criterion is optional as not all companies are expected to be able to fulfil it. Concerning its place in the EU Ecolabel, the Regulation stipulates that the product/service licenced with the EU Ecolabel must be of good quality and such a criterion is a good way for a company to signal that their services are well done.
010 (now 09): Vehicle fleet owned or leased by the applicant		
Fleet renewal	Again: According ecological logic this criterion could only be applicable for replacement reserve or new acquisitions but not at the date of the first assessment. In our member companies on	Comment partially accepted. The EU Ecolabel cannot be awarded on the promise of following requirements for future acquisitions; as such it is not possible to set another requirement.

	<p>average vehicles are used 3-4 years at the minimum.</p> <p>As we had a little survey among our members we got to know that on average companies own or lease a rate of 1 vehicle for every 7 contracts. Besides indoor cleaning those companies have other cleaning contracts of the order of 2/3 of the number of indoor cleaning on average, some even more –non-indoor cleaning than indoor cleaning. All these “other” cleaning contracts are maintained by the same executive personnel driving the same vehicles when visiting buildings where indoor cleaning is performed as well as those where e.g. window cleaning is subject of the contract. That means it is impossible to differ between the fleet for indoor cleaning and “others”.</p>	<p>The criterion is optional as to allow a company to assess whether it is in their interest to fulfil it or not.</p> <p>Concerning whether the fleet can be differentiated between cars used as part of EU Ecolabel cleaning and other services, the criterion is clear that if a vehicle is at all used for the EU Ecolabel cleaning service, it is considered as part of its fleet, regardless of whether it is used for other services as well. This "tough" differentiation is necessary as otherwise the verification would be hard to do.</p>
Point allocation	<p>In general, this criterion should only be valid for new purchases.</p> <p>We recommend to give for O10 (a) 2 points and for O10 (c) only 1 point.</p>	<p>Comment partially accepted. The EU Ecolabel cannot be awarded on the promise of following requirements for future acquisitions; as such it is not possible to set another requirement.</p> <p>The Euro 6 standard has been the norm for multiple years and, thus, a fleet of Euro 6 cars cannot be awarded more.</p>
A&V	<p>I received feedback that the required information can be found on the certificate of conformity that is delivered with every vehicle.</p> <p>“The vehicles’ public registration can be used as proof of compliance, <u>along with the certificate of conformity.</u>”</p>	<p>Comment accepted. The wording has been added.</p>
Lower fuel consumption	<p>We would prefer that this criterion would describe more precisely what is required to provide more clear guidance to applicants and CB’s.</p> <p>The transport management plan should consist of a strategy to reduce the fuel consumption of the vehicles and specify the planned actions: rationalisation of the travel, training eco-driving, regular control of tire pressure, renew plan of the fleet.</p> <p>Verification:</p>	<p>Comment accepted. A new sentence has been added to the criterion.</p>

	Annual verification of the realisation of the planned	
Information on feasibility	<p>O10 (a): We are able to fulfil with a high investment</p> <p>O10 (b): We are able to fulfil with a high investment, but we are going to buy at least 1 vehicle this year and another one the next year. (now we have a fleet of 5 vehicles)</p> <p>O10 (c): We are not sure what is referred to this point exactly or how to do it</p>	<p>Comment accepted. For sub-criterion (a), all new vehicles on the market should fulfil Euro 6 standards and should not be an issue.</p> <p>Further discussions will be held with Competent Bodies and companies to establish the User Manual explaining the transport plan and what is expected.</p>
Feasibility	Yes, normally the vehicles of cleaning companies are two-passenger commercial vehicles	Comment acknowledged.
Feasibility	No, acquiring zero emission vehicles is a high expense for small businesses (if you already have vehicles of (a))	Comment acknowledged.
Euro 5/Euro 6	<p>It is positive that this criterion was kept optional. However we completely reject the removal of the European emission standard Euro 5. It is not acceptable to only prescribe the Euro 6 standard that is only binding for the registration and sale of new types of cars as of September 2015. We refer to the arguments expressed on criterion O6 (“against any environmental and economical reasoning”). It is therefore unconditionally necessary to respect the depreciation period of each vehicle in use and, as a consequence, to keep the 50% for Euro 5 vehicles and to only foresee compliance with Euro 6 from the time when a new vehicle is purchased.</p> <p>Finally, it needs to be stated within this criterion (and not only in the rationale of the criterion) that it does not apply to privately owned vehicles, even if they are used for the service provision.</p>	<p>Comment partially accepted. The criterion text already states that privately owned vehicles are not covered by this criterion.</p> <p>In the best of cases, these criteria will be officially published in early 2018, meaning over two years after the Euro 6 standards came into force. While most vehicle lifespans are much higher than two years, the EU Ecolabel aims to highlight the best performers and, as such, it aims for fleets with Euro 6 and zero-emission vehicles.</p>
O11: Efficiency of laundry washing machines owned or leased by the applicant		
Professional machine	Again: According ecological logic this criterion could only be	Comment partially accepted. The EU Ecolabel cannot be awarded on

use	<p>applicable for replacement reserve or new acquisitions but not at the date of the first assessment. On average washing machines are used 7 years by our member companies.</p> <p>In Germany it is rather uncommon to use household washing machines in companies. Sometimes their commercial use is not even covered by the insurance of the cleaning company. So using household washing machines is no alternative for a lot of companies.</p> <p>"In general, this criterion should only be valid for new purchases.</p> <p>In general, the question should be raised whether cleaning service providers use household washing machines and not rather commercial washing machines.</p> <p>Thus, we recommend to add to point O11 (a) a criterion for commercial washing machines regarding the energy demand in order to avoid a discrimination of household washing machines."</p>	<p>the promise of following requirements for future acquisitions; as such it is not possible to set another requirement.</p> <p>The requirements for professional/commercial machines were added as it was observed that in many cases household machines cannot be used.</p>
A+++	<p>Criterion O11. We suggest also differentiate more in regards to energy performance E.g. 1/2 points for washing machines A++ and 2/4 points for A+++, respectively 50% or 90 %.</p>	<p>Comment partially accepted. An extra threshold has been added for A+++ machines.</p>
General information	<p>"O11 (a): We fulfil at this moment. we only have one washing machine and comply with A++ class</p> <p>O11 (b): We would have to revise"</p>	<p>Comment acknowledged.</p>
Renewal of machines	<p>It would not be possible to renovate the fleet of complete washer / dryers. If, at the time the company needs to buy new equipment, it must be classically efficient.</p>	<p>Comment acknowledged.</p>
Non-EU Ecolabel use	<p>"It must be noted that no energy label exists for commercial washing machines, but that cleaning companies often need to use them because the household machines run too long to fit in the</p>	<p>Comment partially accepted. It can be foreseen that if a washing machine is at the applicant's premises, they will be used for more than EU Ecolabel service use. Alas it is not currently possible to easily</p>

	<p>shift of a cleaning provision.</p> <p>Here again we refer to the arguments expressed on criterion O6 (“against any environmental and economical reasoning”). It is therefore unconditionally necessary to respect the depreciation period of each washing machine in use and, as a consequence, to only foresee compliance with both sub-criteria from the time when a new washing machine is purchased.</p> <p>Finally, this criterion is only manageable if the Ecolabel is awarded on a contract-based level. Otherwise the company has to bear costs that will never pay off the higher investment costs for those washing machines. Especially washing machines used in the premises of the cleaning company are also applied for many non-ecolabelled cleaning services.”</p>	differentiate between different service line uses.
O12 (now O11): Ecolabelled services and other ecolabelled products		
Ecolabelled services	<p>According to our knowledge and German Umweltbundesamt we don’t know of any services that are labeled according O12 (a).</p> <p>Suitable ecolabeles which allow points under O12 (a) are not known in DE.</p> <p>Please discuss the aspect/criterion O12 with GPP experts. Within the tendering process, esp. regarding the award criteria, it is necessary that the award criteria are related to the contract item. According to our knowledge, e.g. the used paper in a company cannot related to the here discussed service. The question for us is: is it possible to use an ecolabel within a tendering process that includes criteria that are not related to the contract item?</p>	<p>Comment accepted. In the EU Ecolabel scheme there are none, but some exist in other ISO Type I ecolabels and more might appear in the future.</p> <p>The EU GPP criteria will be developed with the comments provided kept in mind</p>
Laundry services	Rationale of proposed criterion text	Comment rejected. The Nordic Swan is an ISO Type I ecolabel and they

	There is no Type I ecolabel for “laundry services” Laundry services are managed with certified management processes, e.g. DIN 14001	offer certified laundry services.
Point allocation	High number of points especially for car cleaning which isn’t done every week compared to the environmental savings from laundry, cleaning supplies have to be cleaned after each use.	Comment accepted. The point allocation has been reviewed.
Feasibility	O12 (a): We would have to revise. We are not sure O12 (a): We would have to revise. We are not sure, but we think would not be complicated	Comment acknowledged.
Costs	No, having 100% of products with ecolabel is 137% of the cost compared to non-Ecolabel products (currently in Spain). Yes, it will not mean a change in the investment in products (in the future).	Comment acknowledged.
	The sub-criterion O12 (a) refers to eco-labelled laundry services and car washes, without providing any evidence that these services exist. We also strongly doubt about their existence and therefore reject this sub-criterion, as it is objectively impossible to fulfill this sub-criterion. Evidence about the availability of these services is therefore needed before establishing this sub-criterion. Even if an eco-labelled car wash service would exist, it is out of any commercial practice to expect that a cleaning company will send a driver to such a car wash that is kilometers away from the company’s or client’s premises.	Comment partially accepted. It should not be forgotten that the services can hold licences of other ISO Type I ecolabels and not just the EU Ecolabel (e.g. Nordic Swan, for which there are laundry services and car washes). Moreover, the aim of the criterion is to create interest and demand in such services to increase their presence.
05 (now O12): Consumable goods and electric hand air-dryers supplied to the client		
Clarification	To reach the Ecolabel the applicant would have to fulfill this criterion in all indoor cleaning contracts even for customers who have no interest in the Ecolabel. So to reach the high thresholds companies have to limit that service to customers who are willing to use those products (because the	Comment accepted. As for all other product criteria, this criterion only targeted EU Ecolabel services and not all indoor cleaning services. The text has been amended to reflect this.

	applicant is in no way able to force the customer to do so). In all other cases the company has to abstain from that business letting the customer himself buy those products. In other words: We speak for a much lower percentage.	
Fate of tissue paper EU Ecolabel	Additionally we heard about plans of the Commission to take (b) and (c) out of the scope of the Ecolabel for Tissue Paper? How would that affect the criteria of this Ecolabel?	Comments acknowledged.
	Based on the information at the EUEB-Meeting: It is questionable how O5 (b) and O5 (c) should be handled in the future.	
Hand dryers	"O5 (e) Electric hand dryers (2 points) Proximity sensors are not a very high requirement. Represents imbalance with textiles and paper."	Comment accepted. The requirements for hand dryers are now within the general requirements for hand-drying methods but it was impossible to set other requirements besides proximity sensors as those requirements need to be verifiable.
Mise en oeuvre	"Do I understand correctly that in case the EU Ecolabeled service line covers 20 contracts and for one of those contracts they deliver 75% EU Ecolabel hand soap they would get 2 points for the service line? If this is the approach I strongly disagree. They should reach the proposed percentage for all the contracts covered by the service were consumable goods are delivered. Otherwise I consider this as a loop hole. They can provide the EU Ecolabel consumables to 1 very small contract and benefit from a lot of points for the whole service line, which isn't correct in my view.	Comment accepted. The percentages are calculated based on all the EU Ecolabel service contracts where consumable goods are provided so the 70% of hand soap means 70% of the hand soap provided in all of the hypothetical 20 contracts (if they all include the procurement of consumable goods) should be ecolabelled.
Mandatory vs optional	The EEB and BEUC regret that this criterion is proposed as optional. The argument that this is not always under the decision of the cleaning service provider does not justify the removal of the mandatory criterion. We suggest that this criterion is made mandatory again and that the cleaning service provider supplies the customer with the consumables.	Comment acknowledged. Making this criterion mandatory would push companies to create separate contracts for cleaning services and the procurement of consumable goods – indeed, that way they get a "free pass" on a mandatory criterion without ever increasing the amount of ecolabelled goods used. As stated in the report, the percentages reflect the fact that some leeway must be left in case some contracts end and other begin – the cleaning company, while ideally being able to influence the choices of their clients,
	"NGOs recommend that, as a minimum, the following products supplied are ecolabelled:	

	<ul style="list-style-type: none"> - At least 70% by volume of hand soaps; - At least 90% of paper towels and tissues; - At least 90% of toilet papers. <p>We consider these thresholds as minimum requirements. The paper products are among the most successful ones and have a high market penetration in all EU-28 countries, as stated in the technical report. The EEB and BEUC do not see any reasons why the thresholds cannot be raised to 100% or at least 90%.</p> <p>This criterion is of high importance as consumable goods generate waste and cannot be recycled or reused. They have therefore a strong environmental impact. It is crucial to ensure that the majority of the products are ecolabelled and have less environmental impact.</p> <p>The argument stating the will of the client of having other products than ecolabelled should not lead to the undermining of this criterion. On the contrary, when a client wants to benefit from an ecolabelled company, it is understood that the management has environmental awareness and is convinced by the added value of ecolabelled products. "</p>	<p>does always have the power to dictate what consumable goods they must provide. With thresholds set to 100%, companies that rely on this criterion to get a point could easily lose licences from one day to the next, through no fault of their own.</p> <p>The EU GPP criteria will indicate that if the procurer deems it possible, higher thresholds can be set.</p>
General information	<p>"05 (a): We are able to fulfil easily (we are now in a 50% more or less)</p> <p>05 (b): We are able to fulfil easily (we are now in a 70% more or less)</p> <p>05 (c): We are able to fulfil easily (we are now in a 80% more or less)</p> <p>05 (d): we do not use this type of product</p> <p>05 (e): we do not use this type of product. And more over we have doubts about its convenience"</p>	<p>Comment acknowledged.</p>

General information	Yes. Any company can afford to buy recycled paper toilets	Comment acknowledged. There might be a misunderstanding about which types of products are covered by this criterion.
Textile towel rolls	No, a single investment to place self-cleaning towels would not be viable according to the capacity of the company and the number of units to be placed.	Comment accepted.
Feasibility	<p>"This criterion is not feasible. It is impossible for the cleaning company to comply with this criterion if the client wants other products or other volumes. The cleaning company is not in a position to prescribe the client, which consumable goods he needs. If the client wants consumable goods with an Ecolabel, he must impose those products in the tender documents and pay for it. It is not up to the cleaning company to bear the additional costs of green products. This criterion is therefore only potentially achievable if the Ecolabel is awarded on a contract-based level.</p> <p>Furthermore, the percentages required are much too high. It is therefore of utmost importance to lower the thresholds or to add a second threshold of a lower percentage and to allocate 1 point to this second threshold.</p> <p>Finally, for dispensers that are already installed, it is not always possible to get the product. Contrary to what is stated in the former report on page 47, claiming in May 2015 there were 490 products available with EU Ecolabel for soaps and shampoos, it is now stated on page 55 that there are 1.059 products available. We strongly doubt about an increase of more than 100% in only four months. In addition, it is still not clarified how many of the products enumerated are for professional use and for fitting into those dispensers."</p>	<p>Comment acknowledged. This criterion is proposed to be optional for the very reasons listed in the comment – companies can focus on other criteria if they feel that they cannot influence the choices made by their clients.</p> <p>Concerning product availability, the data listed is the latest data as provided to us by the EU Ecolabel Helpdesk, which relies on information provided by the Competent Bodies. A sharp increase or decrease of numbers can be explained by some countries updating their data irregularly. The latest data available is from September 2016 and shows that 649 products are on the market; the next update to the data is expected in April 2017.</p>
TR3 issues		
Dust control mats	<p>Dust control mats</p> <p>The argument in the annex that the use of dust control mats are not common throughout Europe is not valid, because dust control</p>	Comment accepted. Research on the subject has highlighted that the placement of dust control mats is usually under the control of the client and not the cleaning company. As such, it is proposed to propose a criterion this issue in the EU GPP, which is aimed at procurers.

	<p>mats are a commonly used method to support floor cleaning processes. Using dust control mats should be considered as an example of best practice and therefore encouraged.</p>	
<p>Survey results</p>	<p>We completely reject the recurring references made to the online survey in annex F. Only 28 companies from the 171.000 cleaning companies in Europe existing (EFCI data 2016, figures 2014), have participated in that survey. This is a participation rate of less than 0.02%! Therefore this online survey has no scientific significance and no informative value at all. Using this reference for the entire industry is completely wrong and misleading.</p>	<p>Comment partially accepted. Several of the companies contacted to take part in the survey were highlighted by our research as front runners in the environmental field and who might be potential applicants. The results were never meant to represent the view of the whole cleaning service industry. The text has been amended as to not mislead to potential misunderstandings.</p>

7.4. Annex C1: Stakeholder feedback following June 2017 EUEB 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 remarks		
Definitions	<p>Article 2 is missing some important definitions that need to be added:</p> <p>-- "products directly used": please define what you mean when mentioning this during the whole text (i.e. M1), it is unclear.</p> <p>-- "separate accounting records" (if we don't define this clearly, any CB would implement this requirement in a different way, we propose to use the same approach followed by Nordic Swan)</p> <p>As for "separate accounting records" we don't agree that this could be achieved, for instance, by informal documentation. We think this isn't enough. We suggest to use a definition similar to the one used by the Nordic Swan:</p> <p>“Departments with their own accounts, such as regional departments, or other departments or divisions may, however, apply (on the understanding that these are separate economic profit centres). In such case, the name of the profit centre(s) for which the application is made must be stated on the application form.”).</p> <p>We could be inspired by the definitions of "Organizations" taken from EMAS:</p> <p>“Organisation: means a company, corporation, firm, enterprise, authority or institution, located inside or outside the Community, or part or combination thereof, whether incorporated or not, public or private, which has its own functions and administration” and therefore specificity in the</p>	<p>Comment partially accepted. The description of what is considered as "separate accounting records" has been updated. Moreover, the wording on the products covered by the scope of M1 has been clarified.</p>

	<p>second last paragraph of Article 3:</p> <p>“The service awarded the EU Ecolabel shall have been provided by the company or part of the company with its own functions and administration”</p>	
Definitions	<p>Although the term “private residences” had been defined in the 3rd draft technical report, the definition does still not take into account the fact that cleaning companies provide business to business and not business to consumer services. Domestic cleaning in private residences is out of scope of professional cleaning companies. The market for private households is largely covered by undeclared work relationships between a private household and a person that cleans on his own account. In many countries, the tax laws also clearly distinguish between b2b and b2c services. Thus, the definition still must be adapted accordingly.</p> <p>The term “publically accessible hospital areas” remains unfeasible. In case the cleaning of a hospital is outsourced to a cleaning company, the hospital is cleaned in its entirety. On page 19 of the 3rd draft technical report it is stated that “the areas designed as ‘publically accessible’ might differ from region to region or even hospital to hospital”. This clearly acknowledges that a clear distinction is simply not possible. In addition, in Southern Europe also disinfection activities (that are explicitly excluded from the scope) are regularly carried out in hospitals on a periodic basis. Therefore, the implementation of this criterion is objectively not possible in practice and, as a consequence, we retain our demand to exclude “hospitals” from the scope of the product group “indoor cleaning services”.</p> <p>The new term “cleaning of small glass surfaces” demonstrates a clear improvement to the previous versions. Indeed, while small indoor glass surfaces are covered by regular office cleaning, outdoor glass and window cleaning is not because these activities are carried out with specialised equipment or machines as well as highly qualified cleaning agents.</p>	<p>Comment acknowledged. The definitions and wording proposals have been aligned as much as possible with the different proposals made by stakeholders.</p>
Scope	<p>The new Ecolabel for Indoor Cleaning Services is a mixture of criteria for the indoor cleaning service itself and criteria for service providers. Some criteria are not restricted to the Ecolabel service, but refers to the whole</p>	<p>Comment accepted. The new wording on who can apply should limit difficulties with assessment and verification (only a separate company or sub-company can apply), but sometimes it is impossible to separate the</p>

	<p>company. So the scope is not only the “service”.</p> <p>So we will have a problem for the assessment and verification of the criteria.</p>	<p>cleaning tasks from the overall running of a business.</p>
Article 3	<p>Spain is against the new paragraph included in Article 3:</p> <p>“For all services falling within the scope, as defined in Article 1 of this Decision, the company may not provide both EU Ecolabel and non-EU Ecolabel services. Any other cleaning services provided by the company that fall outside of the scope shall not be covered under the EU Ecolabel license and shall not be marketed as such.”</p> <p>We vote in favor of keeping the original text that is the following:</p> <p>“Any other cleaning services provided by the company that fall outside of the scope shall not be covered under the EU Ecolabel license”.</p>	<p>Comment rejected. The final wording is a compromise that makes assessment and verification easier for Competent Bodies, this requires a limited scope as to what types of companies can apply.</p>
Article 3	<p>2a) “Separate accounting records”</p> <p>We strongly denounce the proposed specification for EU Ecolabel applicants. The previously used terms “separate accounting” and “service line” have been replaced by the term “separate accounting records”. This is no improvement at all, as the underlying problematic – the unfeasibility in practice - remains the same. The term still implies that both, cleaning companies and suppliers have to reconvert their accounting although only a small part of the services provided and the products supplied will fall under the scope. And all this only to prove compliance with a label, of which is unknown if it will be requested by clients in the future.</p> <p>Article 3 rightly implies that a company offers Ecolabel services as part of its business portfolio while other services are provided without Ecolabel. Applying the term “separate accounting records”, makes it then necessary to reconvert the accounting only for those services that fall under the scope in order to specify and to verify, which areas/worksites fall under an eco-labelled services provision and which do not. This leads to an immense bureaucratic effort that is difficult, if not impossible to manage for both, the identification of eco-labelled services and the verification of compliance by Competent Bodies.</p>	<p>Comment acknowledged. Not every company will be able to or want to comply with the criteria but it is essential to have a definition of potential applicants that guarantees that competent bodies can perform verifications easily. Changing the approach to a contract-basis or to the New Zealand approach (where a cleaning site is verified, with both the cleaning company and the client working together to obtain the certification) due to the time necessary for verification and the relatively short span of contracts.</p>

	<p>The already cited example of the Nordic Swan label for cleaning services in Sweden underlines this reasoning. This label is awarded to the company as a whole and actual figures demonstrate that it is nearly not used at all: From the existing 2.387 Swedish cleaning companies only 28 companies (1.2%) are certified with this label (http://www.svanen.se/en/Search-result/?productGroupID=43&searchType=4). Furthermore, this 1.2% of companies consists of only big and medium-sized companies. This clearly demonstrates that even in Sweden, where ecological aspects play a great role, 98.8% of cleaning companies do not have the financial and human resources to go through the certification process.</p> <p>In addition, the proposed specification will not lead to a reduction of the environmental impact. Either clients will not ask for such an Ecolabel or only a few big companies that can afford the additional costs will establish a subsidiary company to comply with the criteria. As a result, those few companies will not improve the environmental situation in a measurable way.</p> <p>As a consequence, it is of utmost importance that the Ecolabel for cleaning services is only awarded on a contract-basis and not to the entire cleaning company or on the basis of separate accounting records. This is the only possible way to exactly implement the criteria and to verify the compliance. The “New Zealand Ecolabelling Trust License Criteria for Cleaning Services” demonstrates that this is possible in practice.</p>	
Scope	<p>The EU Ecolabel should be used in the same way as this is done for Tourist Accommodation Services (all or nothing, we wouldn't accept that a hotel has EU Ecolabel rooms and non-EU Ecolabel rooms in the same building). The company should ecolabel the whole “routine indoor cleaning” service they provide. Accordingly, the EU Ecolabel can be used at company level for routine indoor cleaning (the company can continue to offer other services within its business portfolio like window cleaning or industrial cleaning, but the EU Ecolabel cannot be used in relation to these services because they are out of the scope of the criteria).</p>	<p>Comment accepted. The updated wording reflects the ideas of the stakeholder.</p>

	<p>This clear and straightforward approach has the following advantages:</p> <ul style="list-style-type: none"> • Most clear way to communicate what is EU Ecolabeled • In line with TAS • More straightforward verification of the criteria • Criterion 5 Environmental Management System makes more sense since this criterion is also at company level <p>We would like clarity within the criteria document who can apply.</p>	
<p>General</p>	<p>Favourite option:</p> <p>We recommend that you refer the Ecolabel only to the service provider (like the label for tourist accommodation http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2017.028.01.0009.01.ENG&toc=OJ:L:2017:028:TOC).</p> <p>Part of the Ecolabel is then the equipment of the company with energy-saving technology as well as the intention to use environmentally friendly products (where available with an Ecolabel).</p> <p>In this case, it would be normal to review criteria such as the consumption of the cleaning agent application retroactively. Previously, only a declaration of intent would be given.</p> <p>The criteria would have to be modified to allow greater acceptance of the Ecolabel.</p> <p>In hospitals, schools and canteens, a disinfection is partly prescribed by law in certain cases. This ordered disinfection should be included in the criteria as a permissible exception. Also an exception for floor intensive cleaning (non routine cleaning of floors with “Strippers” to remove polymer coatings) of the criteria is useful. So we need a clarification in this points.</p> <p>Second option:</p> <p>The results of the discussion are passed on as a helpful information to the further development of the GPP criteria for cleaning services. An EU</p>	<p>Comment acknowledged. The new proposed scope largely limits what kind of non-EU Ecolabel cleaning a company can perform.</p> <p>Concerning the use of disinfectants, while in a GPP, a contractor might choose to require disinfection, the general consensus is that the EU Ecolabel should never sanction the use of disinfecting agents. If disinfection is needed, then it should be considered as special cleaning and non-routine.</p>

	Ecolabel in this area would not be pursued.	
A&V - general	ANNEX: Assessment and Verification The list of cleaning sites where the applicant shall provide EU Ecolabel cleaning services cannot be sent annually but should be sent at each new added site, so that the CB could really perform on site surveillance visits while these sites are still "operating".	Comment accepted. A new wording is proposed in the criteria where the applicant should send an update every 4 months, unless they have not signed any new contracts.
Criteria – update references	Remember to update all the reference to the "old" Detergents EU Ecolabel Decisions (i.e. criterion M1, O1...)	Comment accepted. The legal text has been updated.
General	The criteria for the energy consumption of the vacuum cleaners and washing machines must be fulfilled before the ecolabel is awarded. On the other hand the assessment and verification for the use of detergents can only be made retroactively. This creates a problem in the practice of awarding contracts. At the moment it is more like a Label for the provider that will offer also a cleaning service with ecological aspects. That doesn't go. However, we recognize that this problem can hardly be adjusted here.	Comment acknowledged. As the purchase of cleaning products is much more common than that of vacuum cleaners and washing machines, companies cannot be expected to have an existing stock of products that they will use during the validity period of their EU Ecolabel licence.
Sub-contractors		
Sub-contractors	Only sub-contractors who have obtained the EU Ecolabel may be used. Except for the collection of waste bins in sanitary facilities.	Comment partially accepted. The text was amended ahead of the June 2017 EUEB meeting.
Sub-contractors	The provision, according to which it is now explicitly stated that any subcontractor must also hold an EU Ecolabel licence for indoor cleaning services, substantially restricts the use of subcontractors. Why has this been explicitly mentioned, if it's not to make use of subcontractors de facto impossible? This is another competitive disadvantage for companies awarded with the EU Ecolabel. This provision is therefore another argument for what we have stated since the beginning of the entire development process: the future EU Ecolabel in its current form is only achievable for subsidiary companies or newly established companies, with strong negative economic consequences for all other cleaning companies and no improvement of the environment.	Comment acknowledged. The new provision was included as no satisfying was found for companies to provide information about subcontractors that Competent Bodies could check. It does potentially make it harder for some companies to apply for the EU Ecolabel but the EU Ecolabel is not aimed at 100% of the market.

	It is therefore of utmost importance to re-include the 15% rule, which states that a company can make also use of subcontractors that do not hold an EU Ecolabel licence if they do not perform more than 15% of the work.	
General - definitions		
Definitions	Definitions: Clear distinction needed between “Client’s premises”, “Applicant’s premises”, “service line” and “contract to be ecolabelled”. These terms are sprinkled throughout the document.	Comment accepted. In order to avoid confusion, the criteria no longer make reference to "client's premises" but rather to "cleaning sites". A definition has been added of "applicant's premises".
Nordic Swan approach	<p>The definition gives certain flexibility to the applicant to organise the company’s cleaning in different regions/departments/divisions where some of them are ecolabelled and others not. The company may choose to ecolabel a certain region (i.e. region south but not region north). A single division can also be ecolabelled, divisions that takes care of hospital cleaning can be ecolabelled even if the other division in the company are not. A company may also have a separate division for customers with cleaning contracts that exceed a certain value (i.e. x millions). However, all these delimitations within a company are only possible as long the regions/departments/divisions are separate economical profit divisions with their own book keepings.</p> <p>However, a single contract cannot be ecolabelled and a customer cannot choose whether the cleaning they ask for is ecolabelled or not. It depends on if the customer falls under an ecolabelled region/department/division in the cleaning company.</p> <p>This flexibility course naturally a challenge for the marketing of the ecolabelled service and it is demanded that the company is very clear in its communication about which cleaning service is offered by the company is ecolabelled.</p>	Comment acknowledged. The EU Ecolabel text has been amended to have as similar approach as possible while still applying to the whole EU28 territory.
General - criteria		
Number of criteria	However, we found that the number of optional criteria was too high compared to the number of mandatory requirements. The mandatory criteria should be the basis that covers all important areas from the LCA	Comment acknowledged. The mandatory criteria cover the most important environmental hotspots and the optional criteria cover those same hotspots but with higher requirements. The points attributed to the

	<p>point of view. The license should only be awarded to a company who shows good basic environmental performance, in all important areas. On top of the mandatory criteria, the optional criteria should be used to make the whole set of criteria more stringent but give the applicants flexibility.</p> <p>Based on our experience from the Nordic Ecolabel, where 80% of the criteria are mandatory, we know that most of the license holders would come up to 14p already after the optional criterion 5 in the EU Ecolabel draft criteria, and there are totally 12 optional criteria.</p> <p>We found also the different optional criteria to be disproportionate regarding how many points are possible to be gained from the different criteria. The value of each criterion should be connected to its environmental weight.</p>	<p>each criterion is based on the expected environmental gain but also on the difficulty of implementing it as we have to take into consideration that the majority of the indoor cleaning service market is made of micro and small companies and not large groups.</p>
Validity period		
Validity period.	<p>The proposed validity period of 6 years is too long for new first generation criteria. We propose 4 years instead.</p>	<p>Comment partially accepted. As the revision process can take more than two years, a 4 year validity period means that the revision would have to start almost right after the vote of the current criteria. As such, a 5 year period is proposed.</p>
Pre-requisites		
Pre-requisites	<p>This should be made into a mandatory criterion with clear documentation requirements like</p> <ul style="list-style-type: none"> - copy of staff contract - company registration documentation, VAT registration number - declaration on compliance with legal requirements including tax regulations - copy of staff insurance documentation - ID-card for all employees 	<p>Comment rejected. This approach is a compromise that was developed as part of the EU Ecolabel for Tourism Accommodation and reflects what CBs can legally request from companies.</p>
M1: Use of cleaning products with lower environmental impact		

M1 – detergent scope	It is not clear if the detergents that are used for the laundry (including impregnation and conservation) of mops (both internal and external) are included in “products directly used during indoor cleaning service operations”. This should be clarified.	Comment accepted. These types of products are now explicitly cited and included in the criterion.
	Please clarify what is meant by “pre-moistured product”. Is the impregnation of the mops included? We think that it should be included. This can be clarified under the definitions.	
	Does cleaning vinegar fall in the scope of this criterion? It doesn't fall within the scope of the EU Ecolabel for HSC but it is used in a routine way, e.g. for cleaning sanitary facilities and kitchen sinks.	Comment accepted. If it's used for the cleaning tasks, then yes it is covered by the scope. It may not, nevertheless, be counted as an ecolabelled product.
	Does HDD fall within the scope of this criterion? It is used to wash certain items in the kitchen	Comment accepted. No, dish washing is not a common indoor cleaning service.
	Do wooden floor cleaners/care product fall within the scope? This product is used in a routine way but doesn't fall within the scope of HSC because it has a specific application. Do other specific cleaning products like alu-cleaners, inox polish fall within the scope of this criterion?	Comment accepted. If they are used for the cleaning tasks, then yes they are covered by the scope, but they do not count towards the ecolabelled product percentage in most cases. It should be noted though that some of the products listed generally would not pass criterion M1(b).
	Other products that are sometimes used for specific cleaning tasks: e.g. removal of stickers or chewing gum. Do these type of products fall within the scope of this criterion? They aren't routine cleaning products but they may be used by the person who performs the routine cleaning tasks.	Comment accepted. The exact definition of "routine" might differ by location, space, etc. In some cases (e.g. schools), sticker removal might be routine and in that case, proper removal products might be considered in scope.
M1 – chemicals used	One important parameter for the environment that we think is missing in this criterion, is the amount of chemical products that are used. The allowed amount of chemicals that are used in cleaning should be restricted. It could be connected to the functional unit m2/ cleaned surface.	Comment acknowledged. Such a criterion was considered at multiple points during the development of the criteria. The practices encountered throughout the EU28 vary a great amount and it is currently impossible to set a single threshold. As can be observed, even in the Nordic Swan criteria (which covers an area generally considered to be rather homogeneous), the setting of a threshold was not easy and the second iteration of the criteria
	Add criterion on max amount of chemicals used per square meter cleaned. See criteria O2 and O5 in the Nordic Swan Ecolabel. We want to promote cleaning without chemicals with the use of micro fibre mops.	
M1 – A&V	(M1) The applicant shall send in a complete list of all chemical products used in the ecolabelled cleaning.	Comment acknowledged. This aspect is already covered by the requirements set out in the assessment and verification.

M1(b) - text	(M1b) Instead of referring to this document, the actual criteria should be copied in. This will make the document easier to work with for the applicant. The adequate declaration to be signed by producers of non.ecolabeled chemicals products must be included in the user manual.	Comment rejected. To limit the length of the criteria and because of potential future additions to the EU Ecolabel for Hard-Surface Cleaning Products criteria, it is currently proposed to keep only a reference to the criterion.
M1(b)	This criteria set favors the use of wet wipes and other pre-moistured products since they aren't part of the calculation and only have to comply with criterion M1(b).	Comment acknowledged. In some cases, the use of wet wipes and other pre-moistened products is necessary to avoid contamination or very small jobs. Their minimal use is covered in the Staff Training criterion but they cannot be fully covered under M1(a).
M1/O1	<p>It is positive to note for both criteria that “Only products directly used during EU Ecolabel indoor cleaning service operations are covered by this criterion”.</p> <p>The percentage of 50% for the criterion M1 (a) must be kept, as it is not at all known how many cleaning products for professional use are available. In this regard, we refer to our previous comments related to the 3rd draft technical report.</p> <p>Although the list of hazardous substances is now clearer for criterion M1 (b), there is still more expertise needed on the availability of non-toxic products. For certain applications, as for example periodic deep cleaning of floors, it is very difficult to get non-toxic substances. In addition, also for indoor cleaning it is once in a while necessary to use disinfectants. Finally, through this criterion, the use of high concentrated products will be impossible, as no professional cleaning product with an Ecolabel exists.</p> <p>The assessment and verification process for both sub-criteria, will lead to an immense bureaucratic effort for both the cleaning company and the Competent Body. The provision of annual data and documentation for criterion M1 (a) as well as a declaration of compliance supported by safety data sheets for criterion M1 (b) does not necessarily prove that these products have been really used and respectively not used when executing contracts that fall under the EU Ecolabel.</p> <p>The reformulation of criterion O1 is positive, as a third threshold of 50%</p>	<p>Comment partially accepted. The non-use of disinfectants in EU Ecolabel services (and the fact that disinfectants cannot be awarded the EU Ecolabel) is an approach that has been agreed on for the whole scheme.</p> <p>Concerning the presence of highly concentrated EU Ecolabelled products, some undiluted EU Ecolabel sanitary and all-purpose cleaners are already present on the market and, with the expansion of the scope of the EU Ecolabel for Hard Surface Cleaning Products, their number is expected to increase.</p>

	with 1 point allocated has been added. This must be kept in the final version.	
M2: Cleaning product dosing		
M2	<p>It is positive to note that this criterion is only aimed at “Cleaning staff performing EU Ecolabel indoor cleaning tasks...”</p> <p>We herewith again restate that it is unrealistic to have a dosage system at small cleaning sites. If such a dosage system is not installed or provided for by the client it must be provided for by the cleaning company. This is regularly not the case for small sites and therefore this criterion is not reachable for SME’s. As the aim of this criterion is to prevent over-dosing (page 35 of 3rd draft technical report), it should be therefore more clearly specified that not the access to dosing and diluting apparatus is essential but the fact that the company uses diluted cleaning products.</p>	Comment partially accepted. The criterion asks for staff to be provided with a dosing system but that system can be very simple and is not a burden on the company or client – a cap on a bottle is a dosing system or even spray actuations.
M3: Use of microfiber products		
M3	Without the use of detergents	Comment rejected. The proper care and laundering of mops and cloths is proposed to be left up to the cleaning companies themselves as requirements might be different depending on areas cleaned, etc.
M3	Criterion M3 - definition of ‘microfiber’ required	Comment accepted. Definition added ("microfibre" is synthetic fiber finer than one denier or decitex/thread)
M3	<p>It is positive to note that “Only non-disposable textile cleaning accessories directly used during EU Ecolabel indoor cleaning services operations are covered by this criterion”.</p> <p>Furthermore, it is positive that the percentage of 50% has been kept because microfiber products cannot be used for all cleaning tasks, such as in cleanrooms or for periodic deep cleaning of floors.</p> <p>However, there is – except the cited UNEP study from 2008 (page 37 of 3rd draft technical report), no evidence given that microfiber accessories are advantageous to other tissues. More expertise is needed on the benefits of using microfiber products, such as life-cycle analysis.</p> <p>The assessment and verification process for the use of microfiber</p>	Comment acknowledged. The assessment and verification proposed was developed in order to be time and resource effective. While the purchase of materials does not guarantee their use, it is not foreseen for companies to spend money on accessories they will not use.

	products is not possible, only the purchase of these products. At what point in time this has to be proven and how can this be verified by the Competent Body? If anything at all, verification of this criterion is only possible in case the Ecolabel is awarded on a contract-basis!	
M4: Staff training		
M4	Criterion M4 – definition of “EU Ecolabel cleaning tasks” is this the same as the “service line” or “contract to be ecolabelled” – see above.	Comment accepted. Cleaning tasks refer only to the tasks performed by the cleaning staff and do not cover other business operations. The text no longer makes reference to service lines to avoid confusion.
O2	Criterion O2 – definition of “indoor cleaning service operations” – is this different from “service line” etc? see above.	
M4	<p>Industry stakeholders have informed me that 4 weeks isn't sufficient.</p> <p>Reading the criterion I understand that new staff should get a complete training on the listed topics within 4 weeks. Existing staff should get a yearly update.</p> <p>I don't fully understand what has to be done in case staff is taken over from another company.</p> <p>Staff member A received a full training when he started 5 years ago and received annual updates in the later years, which have been recorded and proven. When the contract is taken over by the EU Ecolabel license holder, should he get an update in that year? When I read the text it looks like nothing has to be done, not even an update that year.</p> <p>Assessment and verification: “number of staff”: not the number but records of which staff member has followed which training in which year should be provided.</p>	Comment accepted. The criterion text was changed before the June 2017 EUEB meeting and it now requires that an adequate training be provided within six weeks of starting employments.
General remarks	<p>a.) General remarks:</p> <p>Training is carried out very differently all over Europe and this has to be taken into account. The cleaning industry in Europe employs people from more than 100 different countries, so it is obvious that each training session provided is a heavy task for the employer. It requires time and</p>	Comment accepted. Proposals for more effective wordings are welcome. The current proposal reflects the different comments received throughout the development process.

	<p>(human and financial) investment and directly translates into cost.</p> <p>It must therefore be clearly stated that each employee performing EU Ecolabel cleaning tasks must only be trained regarding his concrete tasks of the service provision. It makes no sense and increases the company costs' disproportionately to train an employee on all areas enumerated if the tasks of this person include only some of these areas.</p> <p>The new wording (...“if and when they are pertinent to the tasks performed by the staff member”) goes in the right direction, but still leaves ambiguity.</p> <p>The requirement to provide adequate training to all new staff within six weeks of starting employment is a slight improvement. However, the timeframe must be increased further to 2-3 months. Otherwise this would lead to a massive exclusion of SME's.</p> <p>Temporary workers have to be treated differently from permanently employed staff. Those hired for just a short time assignment cannot be treated equally to permanent employed staff. In Belgium for example, the temporary employment sector is responsible for the training of temporary workers. Temporary staff is mainly only required in peak times, such as holidays. Therefore an initial training of 3-4 hours must be sufficient.</p> <p>In case of a transfer of undertaking (Directive 2001/23/EC), the staff is already working at the client's site and is already trained. It is therefore important to maintain the rule that no retraining is anymore required in these cases.</p> <p>Finally, the requirement to update the staff on all the areas outlined in this criterion at least once per year is much too demanding. This does not take into account that legislation updates or technological developments take place on a larger time frame than 12 months. The frequency of staff training shall be therefore changed to every 2 years.</p>	
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Specific remarks	<p>b.) Specific remarks:</p> <p>Regarding energy saving, it is positive to note that the term “room temperature water” has been replaced by the term “unheated water”. This takes into consideration that the temperature of water available at cleaning sites is never as high as room temperature but rather at 8-13 degrees.</p> <p>Waste disposal is only rarely the task of cleaning staff. The reference made to criteria M6 and O7 is going in the right direction but still needs to be improved. It must be clearly stated that the handling of waste should be done according to the local and national regulations and according to what is foreseen at the client’s premises.</p> <p>It is positive to note that the reference to the collection, separation and disposal of solid waste (including hazardous waste as e.g. batteries) has been deleted.</p>	<p>Comment acknowledged. The staff training should always cover local regulations, otherwise it would not be effective.</p>
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M5: Basics of an Environmental Management System

O6: EMAS registration or ISO 14001 certification of the service provider

M5/O6	<p>We restate that for the sake of SME’s, we strongly object criterion M5. There must be a much clearer distinction between criterion M5 and the optional criterion O6. The M5 requirement of having implemented an environmental policy, a precise action programme and an internal evaluation process (including client comments and feedback) is much too demanding, especially for SME’s.</p> <p>There can be therefore no doubt that the majority of the companies in the cleaning sector will be thus excluded from the Ecolabel, as it is made of mainly SME’s that do not have the human and financial resources to meet this criterion. Furthermore, the M5 criterion is only possible for the entire company, not for separate accounting records, a financial profit center, a service line or a single contract.</p>	<p>Comments acknowledged. The EU Ecolabel should be open to SMEs as much as possible but it should make sure that companies applying have an overall environmental approach to their indoor cleaning service. As such, it is necessary for them to establish an environmental policy and have an action plan in order to avoid any possible greenwashing.</p> <p>Criterion M5 does not require the documentation necessary for EMAS or ISO14001 and does not require any external auditing and should not constitute any burdens besides the initial establishment of an environmental policy.</p>
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	<p>The difference between criterion M5 and criterion O6 is so small that it's a much too high burden for SME's to comply with criterion M5. Therefore, either the requirements in the M5 criterion must be strongly lowered or the whole criterion needs to be classified as optional and merged with criterion O6.</p> <p>Finally, also criterion O6 is impossible to reach for SME's. Only some of the big companies have an EMAS scheme and only some middle-sized companies have an ISO 14001 standard. But there is no small cleaning company that has these certifications. As a consequence, this criterion is equally not acceptable.</p>	
<p>M6: Solid waste sorting at the applicant's premises</p> <p>O7: Solid waste management at the cleaning sites</p>		
M6	<p>Criterion M6 – why is it waste sorting at the 'applicant's premises' and not the 'clients premises'?</p>	<p>Comment acknowledged. Due to the relative higher difficulty of ensuring that waste is properly managed at the cleaning sites (necessitates the cooperation of clients, which not all SMEs might easily get), the mandatory criterion only covers the premises that the applicant definitely controls.</p>
M6/O7	<p>The clear distinction between waste generated at the premises of the applicant (criterion M6) and waste generated at the premises of the client (criterion O7) is positive.</p> <p>Furthermore, the clarification within criterion O7 that it only applies to "solid waste generated during the EU Ecolabel indoor cleaning service provision" is also positive.</p> <p>It would be in addition important to expressively state that compliance with criterion O7 is only possible if the client participates / collaborates with the cleaning company. Finally, the reference to local or national waste management practices must be kept in any case for both criteria.</p>	<p>Comment acknowledged.</p>
<p>M7: Information appearing on the EU Ecolabel</p>		
M7	<p>Criterion M7 – Assessment & Verification : "explain how they intend to advertise the logo"</p>	<p>Comment accepted. The criterion has been amended.</p>

M7	<p>This new criterion is written in a very confusing manner. The entire scope of this criterion as well as the notion of “optional label” is not at all clear. The link provided to the “Guidelines for the use of the EU Ecolabel logo” is not working.</p> <p>The sentence below the terms “Assessment and verification” is incomprehensible, as we do not understand to what the word “support” is referring to.</p>	<p>Comment partially accepted.</p> <p>The link has been corrected. The guidelines are set out for the whole EU Ecolabel scheme and are not directly defined in the criteria.</p>
<p>01: High use of cleaning products with lower environmental impact</p> <p>03: High use of microfiber products</p>		
01/03 "free" points	<p>Criteria 01 and 03 give 1 point each "for free" since the 50% must already be covered by the mandatory requirements</p> <p>[01 - 50%]</p> <p>Delete. This is a mandatory criteria</p> <p>Optional Criteria. Should be a minimum of 12 not 14 points as 1 is scored for each of 01 and 03 by complying with M1a and M3 anyway.</p>	<p>Comments partially accepted. The percentage has been changed. It is proposed to keep a "low" option with 1 point in order to slowly encourage companies to invest more and more in these types of products.</p>
01 Point allocation	<p>3 and 4 points should be given here. Compared with 010 on energy labelled washing machines which gives 2 point for 75% A++ label or 2 points for 50% A+++ labeled machines.</p>	<p>Comment rejected. The point allocation takes into account the ease of switching to new products (easy in the case of cleaning products, not so much for washing machines) and the costs.</p>
03	<p>It is positive to note that “Only non-disposable textile cleaning accessories that are directly used during EU Ecolabel indoor cleaning services operations are covered by this criterion”.</p> <p>In addition, the reformulation of this criterion is positive, as a third threshold of 50% with 1 point allocated has been added. This must be kept in the final version.</p>	<p>Comment acknowledged.</p>
<p>02: Use of concentrated undiluted cleaning products</p>		
02	<p>It is positive to note that “Only products directly used during EU Ecolabel indoor cleaning service operations are covered by this criterion”.</p>	<p>Comment partially accepted. Staff training covers the correct use of products and that is the best approach for avoiding overdosing. Currently it is impossible to verify that all staff will be using them correctly but</p>

	<p>In addition, the reformulation of this criterion is positive, as a third threshold of 15% with 1 point allocated has been added. This must be kept in the final version.</p> <p>Although the terms “concentrated” and “undiluted” have been defined in the 3rd draft technical report, we still see confusion between both terms. Regarding concentrates, the overdosage is a much bigger problem. The standard dilution rate for sanitary cleaning products is 1:100 or 1:200. In addition, it is stated on all products that they shall be applied at a higher dosage or even undiluted in case of persistent contamination.</p> <p>Finally, it is nearly impossible to assess and verify whether a product has been used undiluted or diluted. Here again an immense bureaucratic effort is needed to provide documentation on the dilution rate of each product used when executing contracts that fall under the EU Ecolabel.</p>	<p>education is the best way forward.</p> <p>Concerning the assessment and verification, the proposed approach proposes an approach that is both doable by the CBs and applicants (product list and most used dilution rate) – while it is always possible to cheat, a company that is investing in the EU Ecolabel must have other priorities.</p>
04: Use of cleaning accessories with lower environmental impact		
04	<p>4 points is very compared with the environmental savings.</p> <p>Supplies have a high impact but this criterion is only about a very specific subset of the total amount of supplies (mops and cloths) used. It's also not written how many points they get for each.</p>	<p>Comments partially accepted. The number of points was calculated based on the approach presented in Section 4.4 and in Annex E. The criterion text has been amended to list the number of points for each category.</p>
04	<p>It is positive to note that “Only cleaning accessories directly used during EU Ecolabel indoor cleaning services operations are covered by this criterion”.</p> <p>In addition, the reformulation of this criterion is positive, as a second threshold of 20% with 1 point allocated has been added. This must be kept in the final version.</p> <p>Finally, we question the proportionality of this criterion: although the use of eco-labelled mops and cloths has only a limited impact on the environment a maximal score of four points can be achieved.</p>	<p>Comment acknowledged.</p>
05: Energy efficiency for vacuum cleaners		
05	<p>Critère optionnel Efficacité énergétique des aspirateurs ☒ comme vu ensemble à l'EUEB de mars, nous souhaiterions que tout nouvel aspirateur acheté durant la période de validité du référentiel soit un</p>	<p>Comment acknowledged. At this stage, the mandatory criteria focus on the most important environmental impacts that a company can comply with at the time of application. Moreover, the overall goal for the EU</p>

	aspirateur de classe A.	Ecolabel scheme is to limit the number of criteria.
05	It is positive to note that the percentage of 30% of vacuum cleaners applies at the time of the purchase. It has been therefore clarified that the percentage only concerns a future replacement purchase of vacuum cleaners. A depreciation period of each vacuum cleaner in use is finally respected and must be kept in the final version.	Comment rejected. The "at the time of purchase" refers to the energy class (as it will change based on a regular basis), not how the percentage is calculated. The text has been slightly amended to make this distinction clearer. As stated for other criteria, points cannot be attributed on the promise of future behaviour.
06: EMAS registration or ISO 14001 certification of the service provider		
06 – number of points	The number of points given for EMAS 5p and ISO 14001 3p is disproportionately high in relation to the total number of points required which is 14. Especially, when there is already a mandatory requirement on that quality system and procedures must be in place.	Comments rejected. The number of points was calculated based on the approach presented in Section 4.4 and in Annex E. The relative cost to other criteria implementation should be considered, as well as the discussions on points attribution difference between EMAS and ISO 14001 in the EU Ecolabel for Tourism Accommodation.
	Propose 2 point for EMAS or ISO 14001. After the last revision of ISO 14001, this scheme is equivalent to EMAS. The number of points proposed here (5 and 3) are far too much compared to the points given for using ecolabelled detergents.	
07: Solid waste management at the cleaning sites		
07	Criterion 07 must be verified only at the client's premises, therefore the 2 points awarded by this criterion may change depending on the client and, unless the applicant declares that this criterion will be implemented on ALL his clients, the 14 minimum points could not always be guaranteed.	Comment accepted. The criterion has been updated to reflect that the applicant can only receive points whenever they fulfil the requirements set out on all the cleaning sites. The points can never be accumulated.
08: Quality of the service		
08	Criterion 08, the applicant shall earn 2 points even if he shows to fulfil EN 13549 (this should be added in the first sentence of the criterion since it is then reported in the assessment and verification section)	Comment rejected. EN 13549 does not set requirements, only recommendations for certain cleaning tasks. As such, it is not considered equivalent to ISO9001 or INSTA 800.
08	ISO9001 Delete. 3 points for being ISO 9001 certified is far too much. Instead of this giving points, it is a mean for documentation of criterion M5,	Comments rejected. The aim is to reward third party certifications, knowing that while those types of certifications are normal for large groups, smaller companies that make up a large share of the market do

	management system.	not go for them.
08	INSTA 800 This could be a proper mean for documentation, not extra points.	
08 – appropriateness of criterion	Our experience from the Nordic Ecolabel is that component "Quality (e.g. expected cleanliness, standardised checklist)" in the work instructions list is regulated by the contract between the cleaning company and their client and is not steerable by Ecolabelling. The component can, therefore, be deleted.	Comment acknowledged. The aim of the criterion is to steer companies towards always having good (and written) quality procedures and this criterion, while easy to fulfil for some companies, will ensure that there are no lapses.
08	We restate that for the sake of SME's, we strongly object this criterion. SME's will not be able to comply with it. Especially small companies will not have the human and financial resources to implement a quality management system that includes all the different aspects enumerated. In this regard, it must be acknowledged that SME's are doing a lot for protecting the environment even without having those requested schemes or standards implemented (EMAS, ISO, Quality Management, etc.). The fact that the term "quality management" has been replaced by "quality of the service" does not change the content of the criterion. Furthermore, the criterion is only possible for the entire company. Finally, a quality management system has nothing to do with the environment. It must be therefore removed.	Comment partially rejected. (similar comment received on previous draft) The criterion is optional as not all companies are expected to be able to fulfil it. Concerning its place in the EU Ecolabel, the Regulation stipulates that the product/service licenced with the EU Ecolabel must be of good quality and such a criterion is a good way for a company to signal that their services are well done.
09: Vehicle fleet owned or leased by the applicant		
09(a)	I received feedback that the required information can be found on the certificate of conformity that is delivered with every vehicle. <input checked="" type="checkbox"/> "The vehicles' public registration can be used as proof of compliance, along with the certificate of conformity."	Comment accepted. The criterion text was changed before the June 2017 EUEB meeting.
09(c)	We would prefer that this criterion would describe more precisely what is required to provide more clear guidance to applicants and CB's.	Comment accepted. The criterion text was changed before the June 2017 EUEB meeting.

	<p>The transport management plan should consist of a strategy to reduce the fuel consumption of the vehicles and specify the planned actions: rationalisation of the travel, training eco-driving, regular control of tire pressure, renew plan of the fleet.</p> <p>Verification: Annual verification of the realisation of the planned actions</p>	
09	<p>As in criterion 05, it is of utmost importance that this criterion only applies at a future purchase of vehicles. It is against any environmental and economical reasoning to force cleaning companies to replace their existing vehicles by those falling under this criterion. This would be an immense waste of resources and would represent the opposite of being eco-friendly. It is furthermore in complete contradiction to criterion 05 where it has been rightly added that the percentages only apply at the time of the purchase. In addition, this criterion would oblige the cleaning company to purchase the percentage of vehicles foreseen before and in order to being awarded with the ecolabel licence, and this without knowing if any client will request the Ecolabel in the future.</p> <p>Finally, the same vehicles are used by cleaners or supervisors, independently from the fact whether the cleaning operations are eco-labelled or not. This argument is even more pertinent, as both kinds of operations (eco-labelled and not-ecolabelled) will be provided at the same site. Also a fuel consumption reduction per cleaning site is therefore impossible to carry out.</p>	<p>Comment partially accepted. (similar comment received on previous draft)</p> <p>The EU Ecolabel cannot be awarded on the promise of following requirements for future acquisitions; as such it is not possible to set another requirement.</p> <p>The criterion is optional as to allow a company to assess whether it is in their interest to fulfil it or not.</p> <p>Concerning whether the fleet can be differentiated between cars used as part of EU Ecolabel cleaning and other services, the criterion is clear that if a vehicle is at all used for the EU Ecolabel cleaning service, it is considered as part of its fleet, regardless of whether it is used for other services as well. This "tough" differentiation is necessary as otherwise the verification would be hard to do.</p>
O10: Efficiency of laundry washing machines owned or leased by the applicant		
010	<p>Here again we refer to the arguments expressed on criterion 05 and 09 ("against any environmental and economical reasoning"). It is therefore unconditionally necessary to respect the depreciation period of each washing machine in use and, as a consequence, to only foresee compliance with both sub-criteria from the time when a new washing machine is purchased.</p> <p>It has also not been taken into account that no energy label exists for commercial washing machines, but that cleaning companies often need</p>	<p>Comment acknowledged. The text does take into account water-use for machines not covered by the Energy label.</p> <p>Moreover, as it is an optional criterion, a company can choose not to meet the requirements set out and obtain points by focusing on aspects such as the use of ecolabelled cleaning products, etc.</p>

	<p>to use them because the household machines run too long to fit in the shift of a cleaning provision.</p> <p>Finally, this criterion is only manageable if the Ecolabel is awarded on a contract-based level. Otherwise the company has to bear costs that will never pay off the higher investment costs for those washing machines. Especially washing machines used in the premises of the cleaning company are also applied for many non-ecolabelled cleaning services. In addition, no reference is made to the new energy efficiency labelling framework that will presumably take effect as of 2019.</p>	
O11: Ecolabelled services and other ecolabelled products		
O11(a)	What about EU Ecolabelled workwear. This is much more relevant to the cleaning service than products used in the head office of the company.	Comment accepted. The criterion does not limit the scope of the criterion to only certain products so a company can choose to obtain a point for EU Ecolabel uniforms. The list provided is not exhaustive.
O11(a) Ecolabelled services	Tourist Accommodation is the only service in EU Ecolabel. 1 point if all the employees are booked in ecolabelled hotel? This does not sound as relevant to the cleaning service	Comment acknowledged. The requirement lists the EU Ecolabel (in case in the future there is a relevant service covered) but also offers the options to outsource a service to a provider with an ISO Type I ecolabel (e.g. car washes).
O11(a)	High number of points especially for car cleaning which isn't done every week compared to the environmental savings from laundry, cleaning supplies have to be cleaned after each use.	Comment acknowledged. The point allocation is partially based on how easy it is to get a service and the cost. In this case, the availability is very limited so a company would have to go through a lot of effort to meet the criteria and the effort should be rewarded.
O11(b) Ecolabelled products	Must be specified. Ecolabelled dishwasher detergents in the dishwasher in the office?	Comment acknowledged. A very low number of points can be obtained for each product type so that's why the possibility of using any type of ecolabelled detergent is proposed to be kept. The aim is to expand the range and type of ecolabelled products a company might use.
O11(b)	<p>How should we understand "100% of product units of a product group"?</p> <p><input checked="" type="checkbox"/> 100% of all converted paper products bought by the applicant -> 0.5 points</p> <p>Or</p>	Comment accepted. The first interpretation is correct and an explanation has been added to the criterion text.

	<input checked="" type="checkbox"/> 100% of the envelopes <input checked="" type="checkbox"/> 0.5 point <input checked="" type="checkbox"/> 100% of the folders <input checked="" type="checkbox"/> 0.5 point <input checked="" type="checkbox"/> 100% of all copying and graphic paper Or <input checked="" type="checkbox"/> 100% of A4 copying and graphic paper -> 0.5 points <input checked="" type="checkbox"/> 100% of A3 copying and graphic paper -> 0.5 points	
011	<p>We restate our previous comments regarding sub-criterion 011 (a) that refers to eco-labelled laundry services and car washes, without providing any evidence that these services exist. We also strongly doubt about their existence and therefore reject this sub-criterion, as is it objectively impossible to fulfill. No evidence about the availability of these services is provided.</p> <p>Even if an eco-labelled car wash service would exist, it is out of any commercial practice to expect that a cleaning company will send a driver to such a car wash that is kilometers away from the company's or client's premises.</p>	<p>Comment partially accepted. (similar comment received on previous draft)</p> <p>It should not be forgotten that the services can hold licences of other ISO Type I ecolabels and not just the EU Ecolabel (e.g. Nordic Swan, for which there are laundry services and car washes).</p> <p>Moreover, the aim of the criterion is to create interest and demand in such services to increase their presence.</p>
012: Consumable goods and electric hand air-dryers supplied to the client		
012(d)	Are there any Type I ecolabel covering this product group?	Comment acknowledged. Yes. For example, Blue Angel has certified several products (https://www.blauer-engel.de/en/products/electric-devices/hand-dryers).
012(d)	Criterion 012: we propose to delete 012-d (Electric Hand Dryers) because it would award 1 point in a very easy way, not compared with the effort done by using Iso type I certified paper goods or textiles. We should support the use of certified goods and not the use of a simple "proximity sensor". In case this requirement cannot be deleted at least the number of points given for certified goods should be higher than those given for a proximity sensor.	Comment acknowledged. Currently ISO type I label products are available but are very limited geographically. As the reduction of energy use is an important aspect of appliances such as hand dryers, it is proposed to keep the number of points the same for ISO type I label products and those with proximity sensors, until the availability of the former increases.

012	<p>Does HDD fall under the scope of M1 and O1 or could it be considered as a consumable good?</p> <p>O12(a), O12(b) and O12 (c) should become mandatory criteria.</p> <p>Is it necessary to list the relevant Commission Decisions, We don't do that for the other type 1 labels. If the criteria are revised it would no longer be correct.</p>	<p>Comment acknowledged. No evidence was found that cleaning companies generally provide hand dishwashing detergent as a consumable good to their clients.</p> <p>The criteria are not proposed to be made mandatory because it is would push cleaning companies to have separate contracts with their clients for consumables.</p>
012	<p>We restate our previous comments in their entirety. This criterion is not feasible. It is impossible for the cleaning company to comply with this criterion if the client wants other products or other volumes. The cleaning company is not in a position to prescribe the client, which consumable goods he needs. If the client wants consumable goods with an Ecolabel, he must impose those products in the tender documents and pay for it. It is not up to the cleaning company to bear the additional costs of green products. This criterion is therefore only potentially achievable if the Ecolabel is awarded on a contract-based level.</p> <p>Furthermore, the percentages required are much too high. It is therefore of utmost importance to lower the thresholds or to add a second threshold of a lower percentage and to allocate 1 point to this second threshold.</p> <p>Finally, for dispensers that are already installed, it is not always possible to get the product. Contrary to what is stated in the 2nd draft report on page 47, claiming in May 2015 there were 490 products available with EU Ecolabel for soaps and shampoos, it is stated in the 3rd draft report on page 55 that there are 1.059 products available. We strongly doubt about an increase of more than 100% in only four months. In addition, it is still not clarified how many of the products enumerated are for professional use and for fitting into those dispensers.</p> <p>With this criterion a cleaning company would be forced to highly invest in all those consumable goods before it is eventually awarded with the ecolabel and without knowing if any client would request the Ecolabel.</p>	<p>Comment acknowledged. (similar comment received on previous draft)</p> <p>This criterion is proposed to be optional for the very reasons listed in the comment – companies can focus on other criteria is they feel that they cannot influence the choices made by their clients.</p> <p>Concerning product availability, the data listed is the latest data as provided to us by the EU Ecolabel Helpdesk, which relies on information provided by the Competent Bodies. A sharp increase or decrease of numbers can be explained by some countries updating their data irregularly.</p>

	<p>Next to the fact that this goes against any economical reasoning, this criterion exemplarily underlines our strong request that it is of utmost importance that the Ecolabel for cleaning services is only awarded on a contract-basis and not to the entire cleaning company or on the basis of separate accounting records. This is the only possible way to exactly implement the criteria and to verify the compliance.</p>	
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7.5. Annex D: Methodology used to develop the point system

Table D.1 - Identification of the set of mandatory criteria

Criteria set	Environmental improvement 1 (low improvement) 5 (high improvement)	Technical feasibility 0 (difficult to implement) 1 (easy to implement)	Costs 0 (high investment/cost) 1 (low investment/cost)
SET OF MANDATORY CRITERIA:			
Criterion M1: Use of cleaning products with lower environmental impact	4	1	1
Criterion M2: Cleaning product dosing	4	1	1
Criterion M3: Use of microfiber products	4	1	1
Criterion M4: Staff training	4	1	1
Criterion M5: Basics of an environmental management system	4	1	1
Criterion M6: Solid waste sorting at the applicant premises	3	1	1
SET OF OPTIONAL CRITERIA:			
Criterion O1: High use of cleaning products with lower environmental impact	3	1	1
Criterion O2: Use of concentrated undiluted cleaning products	3	0	1
Criterion O3: High use of microfiber products	3	1	1
Criterion O4: Use of cleaning accessories with lower environmental impact	2	0	1
Criterion O6: Energy efficiency for vacuum cleaners	3	0	0
Criterion O7: EMAS registration, ISO 14001 certification of the service provider	5	0	0
Criterion O8: Solid waste management at the cleaning premises ^{a)}	3	0	1
Criterion O9: Quality of the service	1	0	0
Criterion O10: Vehicle fleet owned or leased by the applicant	3	0	0
Criterion O11: Efficiency of household laundry washing machines owned by the applicant	2	1	0
Criterion O12: Ecolabelled services and other ecolabelled products	2	0	1

^{a)} technical feasibility rated as 0 because while it is not difficult to sort and dispose of solid waste correctly, the execution in this case highly depends on client cooperation.

Table D.2. Methodology used to develop the point system

Certain criteria are OR criteria, meaning that it is only possible to score one or the other (e.g. in Criterion 01, it is possible to obtain 1, 2 or 3 points, not 6). In other criteria, it is possible to cumulate points, with a set maximum total of points that can be cumulated in total (e.g. in Criterion 04, it is possible to fulfil multiple sub-criteria and obtain 2 points for each, with a maximum 4 points that can be claimed in total). For a calculation of the maximum points that can be scored, please see Annex E. Go here

Optional criteria	Environmental improvement^{a)}	weight 50%	Technical feasibility^{b)}	weight 20%	Costs^{c)}	weight 30%	Total^{d)}	Score points to criterion
Criterion 01: High use of cleaning products with lower environmental impact								
50-74%	1.5	0.5	1	0.2	1	0.3	1.3	1
75%-94%	3	0.5	1	0.2	2	0.3	2.3	2
95+%	4	0.5	2	0.2	3	0.3	3.3	3
Criterion 02: Use of concentrated undiluted cleaning products								
15%-29%	1	0.5	1	0.2	1	0.3	1	1
30%-49%	2	0.5	1	0.2	2	0.3	1.8	2
50+%	3	0.5	2	0.2	2	0.3	2.5	3
Criterion 03: High use of microfiber products								
50-74%	1.5	0.5	0.5	0.2	1	0.3	1.2	1
75%-94%	3	0.5	1	0.2	1	0.3	2	2
95+%	4	0.5	1	0.2	1	0.3	2.5	3
Criterion 04: Use of cleaning accessories with lower environmental impact								
04 (a) 20%-49% Mops	1	0.5	1.5	0.2	1	0.3	1.1	1
04 (a) 50+% Mops	2	0.5	2	0.2	1	0.3	1.7	2
04 (b) 20%-49% Cloths	1	0.5	1.5	0.2	1	0.3	1.1	1
04 (b) 50+%Cloths	2	0.5	2	0.2	1	0.3	1.7	2

Criterion 05: Energy efficiency for vacuum cleaners ^{e)}	2	0.5	3	0.2	3	0.3	2.5	3
Criterion 06: EMAS registration, ISO 14001 certification of the service provider								
EMAS	5	0.5	5	0.2	5	0.3	5	5
ISO 14001	3	0.5	4	0.2	3	0.3	3.2	3
Criterion 07: Solid waste management at the client's premises	3	0.5	2	0.2	1	0.3	2.2	2
Criterion 08: Quality of the service								
Non-third party certified	2	0.5	2	0.2	2	0.3	2	2
Third-party certified	3	0.5	3	0.2	3	0.3	3	3
Criterion 09: Vehicle fleet owned or leased by the applicant								
At least 50% standard Euro 6	1	0.5	1	0.2	2	0.3	1.3	1
At least 10% zero emission vehicles	1	0.5	3	0.2	4	0.3	2.3	2
Company transport plan	2	0.5	2	0.2	3	0.3	2.3	2
Criterion 010a: Energy efficiency of household laundry washing machines owned by the applicant (energy and water use)								
At least 50% A++	1	0.5	1	0.2	1	0.3	1	1
At least 90% A++	2	0.5	2	0.2	2	0.3	2	2
At least 50% A+++	2	0.5	2	0.2	2	0.3	2	2
Criterion 010b: Water efficiency of washing machines								
all machines	2	0.5	3	0.2	2	0.3	2.2	2
for commercial or professional washing machines	2	0.5	3	0.2	2	0.3	2.2	2
Criterion 011: Ecolabelled services and other ecolabelled products								
011 (a) Ecolabelled services (hypothesis: 2 services)	2	0.5	2	0.2	3	0.3	2.3	2
011 (b) Other ecolabelled products - At least 50% of product units (hypothesis: 6 products)	4	0.5	2	0.2	3	0.3	3.3	3
Criterion 012: Consumable goods and electric hand air-dryers supplied to the client								
012 (a) Hand Soaps	1	0.5	2	0.2	1	0.3	1.2	1
012 (b) Paper goods	1	0.5	1	0.2	1	0.3	1.0	1
012 (c) Textile towel rolls	1	0.5	2	0.2	1	0.3	1.2	1
012 (d) Electric hand dryers	1	0.5	1	0.2	1	0.3	1	1

a) 1 (low improvement) to 5 (high improvement)

- b) 1 (easy to implement) to 5 (difficult to implement)
- c) 1 (low investment/cost) to 5 (high investment/cost)
- d) Final sum of values obtained by multiplying each aspect (environmental improvement, technical feasibility and economic feasibility) by the each corresponding weight

7.6. Annex E: Points to the optional criterion set

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

Optional criteria	Maximum number of points achievable
Criterion 01: High use of cleaning products with lower environmental impact	3
Criterion 02: Use of concentrated undiluted cleaning products	3
Criterion 03: High use of microfiber products	3
Criterion 04: Use of cleaning accessories with lower environmental impact	4
Criterion 05: Energy efficiency for vacuum cleaners	3
Criterion 06: EMAS registration, ISO 14001 certification of the service provider	5
Criterion 07: Solid waste management at the client's premises	2
Criterion 08: Quality of the service	3
Criterion 09: Vehicle fleet owned or leased by the applicant	5
Criterion 010: Washing machines	4
Criterion 011: Ecolabelled services and other ecolabelled products	5
Criterion 012: Consumable goods and electric hand air-dryers supplied to the client	3
TOTAL	43

7.7. Annex F: Energy label for several models of commercial vacuum cleaners rated C or lower

Table F.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	NILFISK	NILFISK	NILFISK	NILFISK	NILFISK	NILFISK	NILFISK						
Model	T15 /1 ESB 34	GD 10	GD 5	GD 5 HE PA	GU 35 5-2	GU 45 5-2	T15 /1 HEP A ESB 2B	T12 /1	T12/ 1 Park ett	T15 /1 HEP A	T15 /1	T17 /1	BV5 /1	BV5 /1 Bp	T9/ 1 Bp	T 10/ 1	T 10/ 1 Adv v	T 10/1 Adv/S MB Parke tt	T 10/1 Park ett	T7/ 1	CV 38/ 2	ID CV 38/ 2	T7/1 Clas sic EU2	T7/1 Clas sic DIY Prpt 200	CV 30/ 1	CV 38/ 1	ID CV 30/ 1	GD 93 0	GD 93 0 HE PA	GD 930 52	VU5 00 12	VU5 00 15	VP 30 0 EC 0	VP 30 0 HE PA c)		
Rated input power (W)	13 00	13 00	13 00	13 00	12 00	12 00	11 80	11 50	115 0	11 50	11 50	11 50	115 0	115 0	11 50	11 00	11 00	1100	110 0	10 50	10 50	10 50	100 0	100 0	10 00	10 00	10 00	10 00	10 00	10 00	100 0	100 0	100 0	90 0	90 0	
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	C	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	80	80	75	75	80	80	80	71	71	71	72	72	67	67
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7.8. Annex G: Results of limited online survey conducted on cleaning company practices

Several companies were contacted to take part in the survey, including a number that were considered as front runners in terms of environmental performance. The results only provide a limited snapshot of the practices of cleaning companies and should not be taken to represent the practices of the whole industry. Due to time and resource constraints a more expanded survey was not performed.

Number of respondents: 28

Company size: Between 10 and 50 employees: 2 // Between 50 and 250 employees: 7 // More than 250 employees: 19

Ability to have separate accounting for each service line: Yes: 15 // No: 10 // Not sure: 3

Why not? Software doesn't have that capability, services are integrated, some machines and assets are shared, different services are under the same contracts

Percentage of ecolabelled products used: <30%: 12 // 30%: 5 // 50%: 4 // 75%: 6 // 95+%: 1

Percentage of concentrated undiluted products (dilution rate above 1:80): <30%: 8 // 30%: 2 // 50%: 6 // 75%: 6 // 95+%: 6

Do the hazard statements on the product impact your choice of product? Yes: 2 // No: 1

Is your staff provided dosing equipment: Yes, both for ready-to-use products and products that require dilution: 12 // Yes, only for products that require dilution: 14 // No: 2

Why not? Mostly using ready-to-use products

Do you track the amount of products used? Yes: 11 // No: 17

If yes, how? Product/surface, product/client, volume, product/service

Percentage of microfibre mops and cloths: <30%: 1 // 30%: 2 // 50%: 3 // 75%: 11 // 95+%: 11

Percentage of ecolabelled mops and cloths: 0%: 12 // 30%: 9 // 50+%: 7

Why not? High price, didn't know any existed

Do you supply consumable goods as part of your contracts? Yes: 25 // No: 3

Are you able to influence the choice of consumables your client asks for? Yes: 20 // No: 5

If any, what percentage of ecolabelled toilet paper provided: <=30%: 7 // 50%: 6 // 75%: 5 // 95+%: 7

If any, what percentage of ecolabelled paper towels: <=30%: 7 // 50%: 6 // 75%: 6 // 95+%: 6

If any, what percentage of ecolabelled textile towel rolls: <=30%: 4 // 50%: 3 // 75%: 4 // 95+%: 1

Percentage of vacuum cleaners are Energy Class A: 0%: 4 // 10%: 6 // 20+%: 18

Percentage of A+++ washing machines: 0%: 8 // 30%: 6 // 50+%: 8 // company does not own washing machines: 6

Do you outsource laundry services: Yes and they are not ecolabelled: 6 // Yes and they are ecolabelled: 4 // No: 18

Does your company use vehicles in the provision of cleaning services? : Yes: 25 // No: 3

How often is the fleet renewed: Every year: 1 // Every 2 years: 4 // Every 3+ years: 20

Do you have a transport plan: Yes: 12 // No: 13

Does your company have an environmental policy: Yes: 22 // No: 6

Does your company have an action plan to enforce the environmental policy: Yes: 15 // No: 13

Does your company have an internal audit plan for the environmental policy: Yes: 11 // No: 17

Third party certification: None: 6 // ISO 14001: 18 // Both EMAS and ISO 14001: 4

Do you sort waste at your premises: Yes: 26 // No: 2

Do your clients provide ways to sort waste at the cleaning sites: Yes, always: 8 // Yes, most of the time: 15 // No, the majority do not: 4 // No, never: 1

Quality:

- There is a person in charge of overseeing quality management: 27
- Procedures have been put in place to monitor, assess and improve cleaning quality: 22
- Written instructions are provided to cleaning staff on all cleaning sites: 18
- ISO 9001 certification: 22

How often are your staff trained/retrained? More than once a year: 9 // Once a year: 11 // Once every two years: 4 // Less frequently: 4

How long does the initial training last: <1 day: 5 // 1 day: 9 // 2 days: 6 // >2 days: 8